



# **Rulemaking: Take-Off and Landing of Drones in State Parks**

Public comments received  
February 16, 2022 through April 4, 2022, 11:00 am

Corrected to include six omitted comments on pages 162,  
168, 269, 402, 414, and 502.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, April 4, 2022

**Commenter name (if provided):**

Walter Velasquez

**Commenter email (if provided):**

lobo976@gmail.com

**Public comment:**

Hi, my name is Walter, I just want to say that oregon should keep allowing drones to be flying in all oregon except in certain areas, I think this rule is reasonable, but pretending to restrict drones everywhere in oregon and use only in certain areas doesn't make sense for safety reasons, i bought my drone a couple months ago and I'm in the process to get my part 107 license, I'm doing that because I want to enjoy this hobby in a safe way, there is already a lot of rules which are fine for safety; all those who use a drone wrongly deserve to be fine, but those who follow rules shouldn't be punished by restrict the use of it, I really appreciate the attention to this email.

Walter Velasquez.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, April 4, 2022

**Commenter name (if provided):**

Steve Hylton

**Commenter email (if provided):**

shylton@audubon.org

**Public comment:**

Thank you for letting me comment on this issue.... I love our Oregon coast lines and the sea birds that are wonderful to watch but I am totally against drone use anywhere on the Oregon coast not just in state parks, the reason being is drone operators will not comply be the rules and I think you are going to have problems with these people harrassing seabirds because they think its funny so I am against this....But if we have to put regulations on drone landings and takeoffs here is what I would like to see: First I want to thank state parks for providing this opportunity to let the public comment. I have not had any personal experience or events with drones and I hope I never do. I recommend all state parks and beaches use of drones be prohibited unless otherwise indicated as allowable or designated take-off and landing areas  
And state parks should determine where to allow drones based on the best available science  
And have a permit system in place with a fee charge to fly drones in our state parks and up enforcement and ticket violators that break the rules



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, April 4, 2022

**Commenter name (if provided):**

Stephan Nance

**Commenter email (if provided):**

stenance@gmail.com

**Public comment:**

Hello,

I would like to thank the State Parks for providing this opportunity to submit comments.

As a birder, I have noticed the increase in drone use in natural areas over the past several years. This often occurs at times and in places where birds are nesting. In many cases, the people using the drones have no idea there are nesting birds present, because birds tend to be stealthy about where they choose to nest. In other cases, for example near large nesting colonies, it's obvious where the nests are, but people don't understand the impacts of their activity.

I'm writing to recommend that all state parks and beaches be closed to drone take-off and landings except where they can be safely allowed. State Parks should determine where to allow drones based on the best available science, and they should create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts.

While designated areas are being determined, status quo drone use would continue (i.e. this would not ban all drone use at any time during the process). State Parks should include a final map of designated drone take-off and landing locations on their website.

In areas that are approved for drone use, include in the rules:

- No drone take-offs or landing to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas.
- Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.

All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time. Furthermore, State Parks should include strong enforcement mechanisms in final rules, for the benefit of protected species as well as that of non-drone users (who will hopefully not be expected to be on duty to ensure the rules are followed).

Thank you,



Stephan Nance  
Leadership, PDX Feminist Bird Club

Stephan Nance  
they/them  
[www.sparkbirdmusic.com](http://www.sparkbirdmusic.com)



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, April 4, 2022

**Commenter name (if provided):**

Bill Kucha

**Commenter email (if provided):**

billkucha@gmail.com

**Public comment:**

Hello,

As a resident of the coast and founder and chair of 350 Central Oregon Coast I am asking you to do all you can to prohibit drones and fireworks from our coastal nesting areas.

Thank you

Bill Kucha



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, April 4, 2022

**Commenter name (if provided):**

Dan Webb Howard

**Commenter email (if provided):**

dhoward2@uoregon.edu

**Public comment:**

To Whom It May Concern:

I write in reference to the Draft Drone Take-Off and Landing Rules for Oregon State Parks. Thank you for providing this opportunity to submit my views.

Here is what I would like to see in the final rule:

- That all state parks and beaches be closed to drone take-off and landings, except where it is clear that they can be safely allowed
- That any permission to use drones in state parks be based on the best available science
- That State Parks create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts.
- That State Parks include a final map of designated drone take-off and landing locations on their website
- In areas that are approved for drone use, include in the rules:
- No drone take-offs or landing to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas.
- Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.
- That all areas be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science, as wildlife usage can change over time.
- That State Parks include strong enforcement mechanisms in final rules

Thank you for your consideration of my comments.

Sincerely,

Dan Webb Howard



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, April 4, 2022

**Commenter name (if provided):**

Randy Olson

**Commenter email (if provided):**

randyolson@mac.com

**Public comment:**

This is my public comment...

Please allow drones by operators who meet the FAA requirements and are licensed to use Oregon beaches to takeoff and land.

I've worked for National Geographic magazine for 30 years and without the ability to show the beauty of the land, we can't show what is worth saving when faced with logging, fracking, watershed issues etc.

Thank you,

Randy Olson



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, April 4, 2022

**Commenter name (if provided):**

M.A. Kruse

**Commenter email (if provided):**

junehog9@gmail.com

**Public comment:**

OPRD:

Please consider your decision to include wildlife when you decide drone take-offs & landings will occur in State Parks along the ocean shore.

With over a million seabirds & shorebirds nesting along Oregon's coast & beaches each year, including the endangered Western Snowy Plover, locations for take-offs & landings are imperative wildlife will have minimal disturbance.

Understandably, there will be disturbance with the influx of people, noise, companion pets & general drone noises overhead, concentrations of human activities @ take-off & landing locations will produce even greater disturbance.

Thanks for considering wildlife in your decisions. With the 6th greatest wildlife extinction currently underway, your decisions will be significant.

Thanks for the opportunity to comment.

M.A. Kruse  
junehog9@gmail.com

"Marvel at the ordinary." Earl Hightower



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, April 4, 2022

**Commenter name (if provided):**

April Atwood

**Commenter email (if provided):**

hissrattlesnap@gmail.com

**Public comment:**

I have been dismayed by the obnoxious noise and disruption created by drones in parks. Being forced to listen to the extreme noise and annoying behavior of drones buzzing around beaches or parks ruins the outdoor experience for everyone other than the drone flyer. I am sure that the noise and intrusive behavior is even more distressing for nesting birds and other wildlife. Because of this, I recommend that all state parks and beaches be closed to drone take-off and landing. If any areas are designated as approved for drone use, please include in the rules:

- no drone take-offs or landing to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas.
- drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.

All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science, as wildlife usage and other factors can change over time.

Finally, State Parks should include strong enforcement mechanisms in the final rules.

Thank you for the chance to comment on this issue.

- sincerely,  
April Atwood



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, April 4, 2022

**Commenter name (if provided):**

Melanie Jennings

**Commenter email (if provided):**

mjennings26@gmail.com

**Public comment:**

Hello,

I live in Lincoln City and am writing to voice my opposition to drones in state parks and beaches.

Sincerely,

Melanie Jennings



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, April 4, 2022

**Commenter name (if provided):**

Joan Sears

**Commenter email (if provided):**

queenjoan1@comcast.net

**Public comment:**

I am not an expert on bird nesting sites and seasons, nor on the impact of drones on other wildlife. Because disturbance of wildlife is probable and because disturbance of human life is a given, I think the default position on drone use in Oregon state parks should be that they are forbidden. It's bad enough that planes and helicopters ruin the peace with motor noise, and that the proliferation of satellites is spoiling the night skies. Drones are a very intrusive toy and the line should be drawn here.

This Oregonian goes to the state parks for a relaxing time in natural surroundings. Because drones by their nature cannot be confined to paths or fenced areas, just say no.

Joan Sears  
Portland, Or





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, April 4, 2022

**Commenter name (if provided):**

Ed Joyce

**Commenter email (if provided):**

edjoyce1590@gmail.com

**Public comment:**

Greetings,

I surf the Oregon Coast and wish to tell you about an experience I had with drones.

Once I was surfing at the Cove in Seaside and enjoying myself when a drone appeared and it kept buzzing the surfers. At first it was a curiosity, but after about 15 minutes it became a distraction and nuisance to the other 7 or 8 surfers. And to make the situation worse the drone was only about 15 – 20' above our heads. Furthermore, drones disturb wildlife mostly birds but also marine wildlife.

Therefore, I strongly recommend drones only be allowed in areas where it's been agreed upon they won't impact wildlife and somehow keep people from flying them so close to others enjoying the beach.

Thanks,

Ed Joyce  
Astoria



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, April 4, 2022

**Commenter name (if provided):**

Pat Himes

**Commenter email (if provided):**

ferrisp@teleport.com

**Public comment:**

Thanks for taking comments regarding the use of drones in Oregon parks/beaches. I have seen several incidents of people using drones on the beaches in unsafe manners (high winds) that addressing possible risks to wildlife is certainly appropriate.

- Recommend all state parks and beaches be closed to drone take-off and landings except where they can be safely allowed .
- State Parks should determine where to allow drones based on the best available science.
- State Parks should create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts.
- State Parks should include final maps of designated drone take-off and landing locations on their website.
- In areas that are approved for drone use, include in the rules the following: No drone take-offs or landing are to occur within 100 meters of any observed birds and/or known nesting locations, or within 100 meters of seal haul out and pupping areas; drone take-off and landing approval for an area should be discontinued if repeated wildlife disturbance events occur in the same location.
- All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time.
- State Parks should include strong enforcement mechanisms in final rules.

Thanks for allowing me to comment.

Pat Himes

Oceanside, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, April 4, 2022

**Commenter name (if provided):**

Janis Haldeman

**Commenter email (if provided):**

jmhaldeman@gmail.com

**Public comment:**

I read the news the other day - oh boy - how in less than a few months, we humans have managed to get "back to normal" as indicated by the pre-pandemic pollution of our world.

All animals deserve privacy and protection in their homes. They deserve more than we have provided.

Please stop all drones from being brought into all parks. Dogs too.

Janis Haldeman



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, April 4, 2022

**Commenter name (if provided):**

Kyenne Williams

**Commenter email (if provided):**

kyennew@yahoo.com

**Public comment:**

I grew up in Newport, on the Oregon coast, and had the first-hand opportunity to see up close the hundreds of thousands of sea and shorebirds that nest up and down the coast. We owe it to these creatures, who not so incidentally attract tens of thousands of visitors and tourists who support those who live there year-round, to provide a safe and relatively peaceful coexistence. This goes triple for threatened species like the Tufted Puffin, Western Snowy Plover, and Black Oystercatcher. I know from direct observation as well as the reports from family and friends that drones are being used, and are a source of disturbances. This use should be regulated and enforced in locations where public use can be minimized to protect wildlife. Specifically, please consider the following recommendations:

- Close all State Parks and beaches to drone take-off and landings except where they can be safely allowed
- State Parks should determine where to allow drones based on the best available science
- State Parks should create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriately designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts.
- While designated areas are being determined, status quo drone use would continue (i.e. this would not ban all drone use at any time during the process)
- State Parks should include a final map(s) of designated drone take-off and landing locations on their website
- In areas that are approved for drone use, including in the rules:
  - o No drone take-offs or landings to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas.
  - o Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.
  - o All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time.
  - o Finally, State Parks should include strong enforcement mechanisms in the final rules
- Thank you for providing this opportunity and for comment.

Kyenne Williams  
Portland OR

"I learned silence from the talkative, tolerance from the intolerant, and kindness from the unkind." -  
Khalil Gibran



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Monday, April 4, 2022

## Commenter name (if provided):

Maria Wieselmann

## Commenter email (if provided):

mewieselmann@gmail.com

## Public comment:

Dear State Parks, I just became aware through my Portland Audubon newsletter that you are accepting public comments regarding the regulation of drone use in Oregon State Parks. Thank you for providing this opportunity. As an active birder and hiker, I can attest to the fact that drones have spoiled several personal wildlife viewing opportunities over the past couple of years. Please do not allow the take-off and landing of drones in any state parks or beaches. It is already difficult enough to find solitude in our beautiful nature areas and drones have no place in them. The impact they have on wildlife and recreation are enormous and should not be taken lightly! Portland Audubon suggests that there be strict guidelines surrounding drone use regarding how far drones can be from nesting birds, breeding areas for seals, etc. But honestly, I think you should not allow it all! People already fly their drones in national parks where it isn't allowed! I have seen this repeatedly over the past couple of years...allowing it would only cause further chaos. It is so hard to find peace in nature anymore, please do not allow this! Thank you for your time.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Sunday, April 3, 2022

**Commenter name (if provided):**

James Krier

**Commenter email (if provided):**

jmkrier@gmail.com

**Public comment:**

Dear Oregon State Parks,

Thank you for your commitment to public service and your dedication to make Oregon better every year.

My family hikes pretty often but we do not see drones with much regularity on our trips out. I went to Waikiki beach in January and saw a DJI Mavic thirty feet up as I waded through the crowded beach. Two years ago, there was a small 1 pound drone flying off from the pier in La Jolla 100 yards from where we stood. What may have been strange ten years ago is now part of the fabric in a connected, creative society. What appears as a conflict may be a temporary failure to adapt to modest changes.

As a drone photography enthusiast, I am concerned about your proposed action which would allow your parks to establish 'no fly zones.' For years folks have been using drones in Oregon with relatively few issues. How did we arrive at the point where we need to go against FAA guidance and ban an entire activity across thousands of acres of public land? In terms of accidents, drones are not even in the top ten or twenty, yet we are now compelled to take action? (We won't take it anymore)!? How did we get here? How do we justify the notion that the boater, the camper van, the domestic dog and the rock climber have 'the right' to be there, but apparently, the drone photographer has no rights at all?

Local reactionary rules create an unsafe, fragmented and confusing airspace system which does not respect the rights of photographers. Imagine what it may be like when a State Park shares land with National Forests, i.e., a place where drones are permitted. I guess it's up to the user to know exactly where the invisible line is.

The FAA has released a fact sheet which was critical of local control of airspace:

[https://www.faa.gov/uas/resources/policy\\_library/media/UAS\\_Fact\\_Sheet\\_Final.pdf](https://www.faa.gov/uas/resources/policy_library/media/UAS_Fact_Sheet_Final.pdf) The FAA advises against local no fly zones for any aircraft and also notes local governments cannot add additional registration requirements. Based on these concerns Oregon also created a law that prevents any new rules not passed by the State Legislature (ORS 837.385).

Before making burdensome restrictions with questionable legal backing, please consider the

following factors:

1.) Drone footage is protected by the first amendment unlike most outdoor activities. Mainstream and freelance photographers, including the NYTimes, use flying cameras to tell a story. The Ansel Adams of this generation will use drones to do creative and productive things. Idaho State University has even started a degree program in unmanned systems. Please watch a video produced by the National Forest Service:

<https://www.youtube.com/watch?v=HeOI2N6iLy0> Some folks may say drones are intrusive but cameras of all kinds, like on phones, are everywhere in public places. For a story to be adequately told, the fly zone must be far and wide -- it is just not the same as a model airplane hobby.

2.) Did you know that in the entire world, not one person has died in a multirotor drone incident? In contrast there are 500,000 bicyclists that end up in the ER every year. There are 3 million dog bite victims and 600 people who die in recreational boating incidents. There are millions of recreational drones in use, and very little evidence to suggest they are inherently dangerous. DJI has documented over 50 incidents where lives were SAVED in short notice. Most modern camera drones consumers buy weigh about a pound or less (i.e., about the same as a basketball). (What will be Oregon State Parks' policy on tossing basketballs in the air)?

Often, a moving camera removes a human body from risky climbs to take a picture. It's hard to find a safer recreational activity, yet the rule makers do not want to acknowledge the statistics. The next time there is a user conflict with horses will the superintendents ban trail rides in all parks? Drones need to be evaluated fairly and objectively like other activities which all have some risk. With the exception of National Forests, few stakeholders in government have delivered mature level-headed leadership -- it is just too easy to ban any new activity.

3.) It is often claimed that drones are clearly bad for wildlife. In reality, they are being used by researchers because they are less obtrusive than traditional field methods, even hiking. Please check out the following articles published in peer-reviewed science journals.

Title: Using drones to monitor bird nests

<http://www.avianbiology.org/blog/using-drones-monitor-bird-nests> Summary: After the first few trial flights it was clear that this technology poses a huge advantage compared to climbing...

Title: Precision wildlife monitoring using unmanned aerial vehicles

<http://www.nature.com/articles/srep22574> Summary: The authors found that counts using images captured by drones did not startle the birds and were consistently more similar than those taken from the ground

Title: Bears habituate to the repeated exposure of a novel stimulus, unmanned aircraft systems  
Bears habituate to the repeated exposure of a novel stimulus, unmanned aircraft systems | Conservation Physiology | Oxford Academic (oup.com) -

<https://academic.oup.com/conphys/article/7/1/coy067/5248551?login=false> Summary: This research group previously wrote an article showing bear heart beat accelerates when a drone flew over. In this work, they show that the bear acclimates after repeated exposure. (Side note: now many other human activities in parks may cause a bear's pulse to increase)?

Many of us in this community know this is a legitimate and safe recreational activity which allows people around the world to visit your parks virtually when they cannot go physically. It does not deserve to be condemned and criminalized but rather, sensibly reinforced and expanded. Leaders need to create policies that are reasonable -- not reactionary -- as they have for biking, boating and horse riding (to name a few), instead of trying to eliminate an entire activity. How about focusing rules around specific irresponsible behaviors or prohibition in very small high-conflict locations? How about using your voice to emphasize existing FAA rules/registration, best practices, personal



responsibility and common sense?

Thank you for taking time to consider this issue. As the process moves forward, Oregon State Parks will be up to the task.

Regards,

James Krier



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Saturday, April 2, 2022

**Commenter name (if provided):**

Gokhan Altinay

**Commenter email (if provided):**

altinayg@yahoo.com

**Public comment:**

To whom it may concern,

Oregon State Parks should allow responsible drone use and adopt existing FAA rules. There are many activities which are far more hazardous in parks and do not create incredible content for the world to see. Drones get smaller / safer / quieter every year and by limiting photography, the parks are curtailing the first amendment. Flying cameras are literally vehicles used to tell a story. Even if 51% would ban use, free speech is not something that can be eliminated by a simple majority.

If the drone debate in parks has taught us anything it is that the park superintendent/manager model is in need of a major overall in Oregon and across the country. I immigrated from a place that does not have the democratic protections taken for granted here. I can tell you the park superintendent at the state / regional / local level is as close to a dictatorship as one can find in the United States. Through a posted order, we see many cases where drones are totally prohibited at the drop of the hat in every foot of land. There is no public discourse. There are no checks and balances. There is no scientific study. And there is no room for exceptions for journalists who follow the rules and passed the FAA knowledge test. In California, drones are allowed in state parks, but they are nonetheless penalized by the antiquated superintendent management system. In the Great Basin district, a person can literally ride an off road motorcycle or Jeep, yet drone photography is labeled an unsafe activity with too many environmental impacts. In Pennsylvania, a small number of DNR managers suggested a total ban was needed because the reason someone would fly a drone would be to intimidate hunters. It had never actually happened, but why take any chances? Pet dogs, horses, camp fires and motorized boats cause more wildlife disruptions and safety issues than drones ever will. Park superintendents are not so concerned with free speech, safety or consistency. At the discretion of one person, the posted orders make administration as simple as possible and reinforce the social norms of a bygone era. Park managers need to be taught what a reasonable drone policy looks like and how rules can be adequately enforced.

The superintendent/manager model may have been OK in the previous century, but today we need real leadership. I strongly encourage you to simply adopt existing FAA rules. Why does this have to be so complicated? If a person violates an FAA rule, they violate an Oregon State Park rule and action can be taken. This is what the National Forests have done and it has worked well -- many people enjoyed flight responsibly and folks who committed major violations were held accountable. In Oregon policy does not need to be black and white like a posted order. The task ahead for the rules committee is not to make park managers' job as simple as possible.

Regards,

Gokhan Altinay  
Hillsboro, Oregon



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Saturday, April 2, 2022

**Commenter name (if provided):**

Paul Emus

**Commenter email (if provided):**

paulemus@sbcglobal.net

**Public comment:**

It grieves me that ignorant droneistists (like racists) are spoiling peoples rights. I have hanging in my living room large prints of Oregon State Parks coastline shot with my drone. Drones do NO HARM! Unlike California, please keep Oregon beautiful and open minded. Thank you.

Paul Emus  
San Diego, CA



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Saturday, April 2, 2022

**Commenter name (if provided):**

Mark Chipman

**Commenter email (if provided):**

MKC357@GMAIL.COM

**Public comment:**

Why the knee jerk reaction to drones? Rules made without having notable incidences are just made to quiet the public chatter. You do not ban dogs, Kites, bikes { not only a nuisance but a safety hazard } Because so many people enjoy them. Drone operators are no more a nuisance than others. We do not hog the trails or make people move out of the way like bikes. Drone fliers INCLUDING major movie makers just want to enjoy the nature from a different perspective. Making rules to get ahead of a non existent problem have never been in the publics best interest. WE pay taxes and have just as much right to use this land as any others.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, April 1, 2022

**Commenter name (if provided):**

AJ McKenna

**Commenter email (if provided):**

rhythmmama@yahoo.com

**Public comment:**

Drones are annoying, noisy nuisances that should have NO PLACE in our beloved state parks. They disturb wildlife, especially birds, and the peace and serenity natural spaces provide for our mental health. They also are an invasion of privacy. Please DO NOT allow them here!



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Friday, April 1, 2022

**Commenter name (if provided):**

Stephen Bachhuber

**Commenter email (if provided):**

srbachhuber1@gmail.com

**Public comment:**

I thank State Parks for providing this opportunity to comment on drone usage in State Parks. I have witnessed drones at Ecola State Park, Cape Perpetua, and Beverly Beach. None were dangerous to us, but annoying and distracting from the experience.

- I recommend that all state parks and beaches be closed to drone take-off and landings except where they can be safely allowed. The safety of wildlife as well as the safety of humans must be paramount. The quality of the park experience must also be maintained.
  - State Parks should determine where to allow drones based on the best available science
  - State Parks should create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts.
  - While designated areas are being determined, status quo drone use could continue (i.e. this would not ban all drone use at any time during the process)
  - State Parks should include a final map(s) of designated drone take-off and landing locations on their website
  - In areas that are approved for drone use, include in the rules:
  - No drone take-offs or landing to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas.
  - Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.
  - All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time.
  - State Parks should include strong enforcement mechanisms in final rules
- Thanks for this opportunity to comment,

Sincerely,  
Stephen Bachhuber  
Portland, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Friday, April 1, 2022

**Commenter name (if provided):**

Erin K

**Commenter email (if provided):**

bike.ski.yoga@gmail.com

**Public comment:**

Dear OPRD,

As an avid beach user with my family here in Port Orford, I enjoy quiet recreation which has been interrupted more than once by visitors flying drones right over our heads, filming us without our permission, and chasing birds and wildlife. I sit at the beach to watch the wildlife, enjoy the sea breeze, meditate, stretch, and find some privacy from an all too technologically connected world. The intrusion of my privacy and my desire for quiet recreation at my local beach at Hubabrds Creek (part of Humbug State Park) by Drone Users has been a huge point of anger and frustration while living here over the last 7 years. I know my family is not the only local family that absolutely hates when people fly drones around Battle Rock Wayside and Hubbards Creek Beach in Port Orford. Additionally, we enjoy the fact that the area isn't highly "advertised" on social media, keeping our beaches wild and scenic and not overrun by visitors, garbage, and fecal matter like what has happened in California and more specifically places along Samuel Boardman Corridor like "no-so-secret-beach".

Lastly, as a avid local surfer, and protector of our empty waves, the use of drones will only increase negative interactions with locals and visitors, not to mention "blow-up" the area via geo-tagging. Please DO NOT allow drone use at Oregon State Parks, especially Battle Rock and Hubbards Creek/Humbug SP. I can not stress enough that you will really anger a lot of locals who enjoy our quiet area. Attempt to make partnerships with local communities not divisions in favor of "social-media influencing" tourists.

Thank you for your time,

Erin K

Resident of Port Orford





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, April 1, 2022

**Commenter name (if provided):**

C. Coleman

**Commenter email (if provided):**

emmitsma@gmail.com

**Public comment:**

Thank you for taking comments on this issue.

I am not in favor of drones. I am in favor of your strict regulation of their use, with science as the basis for that.

Drones are another 'entertainment' for humans, noisy and potentially dangerous to wildlife. Please protect the wildlife. Humans can surely pull back on such 'entertainment' in order to do a greater good.

C. Coleman



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, April 1, 2022

**Commenter name (if provided):**

Sherry Salomon

**Commenter email (if provided):**

sherrysalomon@comcast.net

**Public comment:**

I am apposed to allowing drones ANYWHERE in parks. The drones frighten wildlife, especially birds. All of our birds are in serious decline, many threatened or endangered.

Protect our birds and wildlife for generations to come!

Sherry Salomon



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, April 1, 2022

**Commenter name (if provided):**

Amie Riley

**Commenter email (if provided):**

amieriley@gmail.com

**Public comment:**

Thank you for considering this call to action regarding drones in state parks. As a longtime Oregonian and avid state park user, with my students and family and friends, I encourage you to:

- Recommend all state parks and beaches be closed to drone take-off and landings except where they can be safely allowed
- State Parks should determine where to allow drones based on the best available science
- State Parks should create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts.

Let's support a future for all Oregonians, including our feathered kin, that is abundant, verdant and safe.

With care,

Amie Riley



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, April 1, 2022

**Commenter name (if provided):**

Randall Hledik

**Commenter email (if provided):**

beaver73@comcast.net

**Public comment:**

Ladies and Gentlemen:

As you consider rules to regulate the use of drones in state parks, please include the following comments in the public record and during your deliberations.

- State Parks should close all parks and beaches to drone take-off and landings except where they can be safely allowed - in regard to both people and wildlife
- State Parks should determine where to allow drones based on the best available science to avoid disruption of wildlife habitat and interference with personal privacy and recreational pursuits
- State Parks should create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts.
- While designated areas are being determined, status quo drone use would continue (i.e. this would not ban all drone use at any time during the process)
- State Parks should include a final map(s) of designated drone take-off and landing locations on their website
- In areas that are approved for drone use, include in the rules:
- No drone take-offs or landing to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas.
- Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.
- All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time.
- State Parks should include strong enforcement mechanisms in final rules

Thank you for your consideration.

Randall Hledik  
Tualatin, Oregon



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Friday, April 1, 2022

## Commenter name (if provided):

Deb Whitcomb

## Commenter email (if provided):

1debwhit@gmail.com

## Public comment:

1st meeting of the UAS Rules Advisory Committee:

I watched the video of the 1st meeting of the UAS Rules Advisory Committee (RAC) and was dismayed to see that the RAC lacked any members representing stakeholders from these crucial areas:

- Wildlife Biology
- Conservation
- (non-drone) Recreational Users

The proposed Draft Rule as originally presented at this meeting was to PROHIBIT all take-offs or landings except in areas specifically designated for drone use.

A member of the committee who is a drone lobbyist suggested to "tweak" the language "a bit", but his suggestion was a complete 180-degree turn, which flipped it to PERMIT all take-offs or landings except in areas specifically prohibited for drone use. This was a huge language change, which undoubtedly would have met with immediate opposition if there had been committee members representing the missing stakeholders.

NOTE: There was no decision on language choice (Prohibited vs Permitted) by the end of this meeting.

---

2nd meeting of the UAS Rules Advisory Committee:

Despite there having been no decision on Prohibited vs Permitted language at the 1st RAC meeting, at the beginning of 2nd RAC meeting, the drone lobbyist's permissive language had become the proposed language.

New members representing Wildlife Biology and Conservation interests had been added for this meeting and they supported flipping the language back to Prohibited except where expressly permitted.

In addition, two of the Oregon Parks employees on the committee made these statements:

- "So often drone use does cause a conflict."
- "There are more parks where drones are going to cause a conflict than not."

These statements from OR Parks professionals presuming that drones will be causing conflicts would seem to further support a default rule of Prohibiting except where expressly allowed.

Despite this disagreement not being resolved in the 2nd RAC meeting, the proposed language put up for public comment was the permissive version.

I will leave it to other Comments to argue the actual merits of the Prohibited language.

My question is WHY?

How (and by who) was this decision to switch to permissive language reached?

And can you make public any communications about this language change between RAC committee members, OPRD, and any other relevant parties during the time between the 1st and 2nd RAC meetings?

Thank you



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, April 1, 2022

**Commenter name (if provided):**

Susan Barthel

**Commenter email (if provided):**

sbarthelpdx@gmail.com

**Public comment:**

Thank you for this opportunity to comment on proposed drone use in State Parks. I myself am opposed to the invasion of privacy that drone use precludes. However, I am even more concerned about wildlife that scatters, hides and suffers from drone noise, shadow, and presence. Therefore I ask Oregon State Parks to implement the following:

- All state parks and beaches be closed to drone take-off and landings except where they can be safely allowed and only where the best available science they can possibly be allowed
- Develop an independent technical working group should be formed to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts.
- In areas that are approved for drone use the rules should include:
- No drone take-offs or landing to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas.
- Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.
- All areas should be periodically reviewed as wildlife and human use changes over time.
- State Parks should develop and include strong enforcement mechanisms in final rules.

Thank you for your response,  
Susan Barthel  
Portland, Oregon



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, April 1, 2022

**Commenter name (if provided):**

Blaine Ackley

**Commenter email (if provided):**

blaineackley@me.com

**Public comment:**

Dear Oregon State Parks,  
I urge you to severely restrict drone usage in sensitive habitat areas so the no drones will interrupt the park ecosystem that you have worked so hard to develop.

Sincerely yours,  
;)Blaine Ackley  
Hillsboro, OR





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, April 1, 2022

**Commenter name (if provided):**

Laura Donohue

**Commenter email (if provided):**

laurajennie@yahoo.com

**Public comment:**

To whom it may concern,

PLEASE ensure protection for our precious avian species and other cliffs dwellers from drones. Is jeopardizing their health and welfare really worth social media images? I have personally witnessed nesting babies encroached by an onslaught of dangerous and intrusive drones. It isn't fair to the birds or the local bird watchers.

Thank you,  
Laura Donohue  
Voting citizen



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Friday, April 1, 2022

**Commenter name (if provided):**

Austin Joseph

**Commenter email (if provided):**

austinjosephbw@hotmail.com

**Public comment:**

To whom it may concern,

I'm a small drone enthusiast and I work for an avionics company that designs and builds DAA (detect and avoid) and situational awareness solutions for small aircraft. We specialize in miniaturized components most suitable for both military and civilian UAVs (drones).

In addition to changes proposed by the Portland Audubon Society adding licensure requirements and adding wildlife disturbance knowledge to the license requirements will provide an effective method of risk mitigation for drone pilots and wildlife.

Requiring drone pilots to acquire an FAA Part 107 drone pilot license would provide a minimal assumed knowledge and safety training that would keep both park visitors and wildlife better protected from untrained pilots.

Further lobbying the FAA to include specifics about wildlife habitats and how to fly safely in conjunction with animals would go a very long way to protect animals from being disturbed by otherwise unknowing pilots.

Thanks for your time and consideration.

Kind regards,

Austin Joseph  
Lead Software Engineer  
Sagotech Avionics Inc.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, April 1, 2022

**Commenter name (if provided):**

Catherine Rutledge

**Commenter email (if provided):**

rutledge5573@comcast.net

**Public comment:**

Hi

Please protect bird nesting areas in our parks from people who use drones.  
I hope you will set rules, provide maps of protected areas and enforce any rules regarding drone usage in parks.

I have neighbors who fly drones over our backyard and it feels very invasive and completely disrupts any solitude.

Thank you,  
Catherine Rutledge



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, April 1, 2022

**Commenter name (if provided):**

Pollu Kreisberg

**Commenter email (if provided):**

pkreisberg@gmail.com

**Public comment:**

Please protect nesting birds from Drone disturbances. It is urgent we prioritize the health of these animals over recreational use of drones. Polly Kreisberg



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, April 1, 2022

**Commenter name (if provided):**

Devon Ashbridge

**Commenter email (if provided):**

devon.ashbridge@gmail.com

**Public comment:**

I support the creation of 'no drone zones' throughout the Oregon State Parks system. Certainly proposals to limit or ban drone use near campgrounds, nesting wildlife, areas with heavy recreation use or around historic buildings makes sense.

My hope is that officials will also consider applying those bans as widely as possible, including along hiking trails and in undeveloped areas. As someone who pursues outdoor activities for mental health benefits as well as physical, the presence of drones - and the nuisance behavior that often accompanies them - would greatly reduce the benefits I and others find in Oregon parks.

Additionally, people are dumb. While many operators may use drones responsibly, enough people will not manage to do so and they will create opportunities for injuries, wildlife issues or fires.

Thank you for your time,

Devon Ashbridge



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Friday, April 1, 2022

**Commenter name (if provided):**

Fran Recht

**Commenter email (if provided):**

franrecht@gmail.com

**Public comment:**

Testimony from Fran Recht, Depoe Bay, Oregon  
Drone Use -Oregon State Parks—March 31, 2022 hearing

Hello. My name is Fran Recht and I'm a long-term resident of Depoe Bay on the coast.

I'd like to testify against any drone use take off and landings from Oregon State Parks except when specifically authorized with a special use permit, for example for special events and research. The use permits would be able to specify appropriate provisions to avoid natural resource and visitor disruption. Additionally, if such special use permits would be required to be visibly displayed (such as is required for wilderness permits), then enforcement would be easy.

I have lived on the coast for 34 years and I have observed the amount of use of our state parks steadily increasing and our parks becoming overwhelmed by visitors. Few new parks have been created in this time period to keep up with the population growth and use.

My observations were recently confirmed with data on visitor use that Oregon State Parks and Recreation compiled and which were reported on in the Oregonian. In a February 18 article, it was reported that the numbers for 2021 showed a general return to pre-pandemic visitor numbers and that this has been a long-term trajectory that has seen state parks getting more and more popular over the last decade. State parks throughout the state saw about 53.7 million visitors, surpassing the previous record of 51.7 in 2016. The Oregon coast was especially impacted by swelling crowd numbers. On the coast 31.4 million visitors showed up surpassing by 2m the previous record set in 2017. In fact, concerned about the usage and impacts on park resources, the spokesman was encouraging people to use other outdoor public spaces to reduce state park crowding!

Simply put there are too many people already coming to the State Parks to add a use that is in conflict with the very values most people report seeking out in State Parks.

In fact in an OPRD survey of over 10,000 Valley Region visitors between 2011 and 2014 , the most popular activities were hiking or walking (54%), sightseeing (40%), picnicking or barbecuing (43%), swimming/ wading (24%), and bird or wildlife watching (17%). A similar study was done in 2019 for coastal parks, but I could not find that online. I'm sure bird and wildlife watching would be even higher in ranking due to the presence of whales, seals and sea lions and many nesting birds, including ones particularly sensitive to disruption such as colonies of common murre and

cormorants, nesting black oyster catchers, iconic ones such as tufted puffins, and threatened ones such as the snowy plover or marbled murrelets. With climate change continuing to put stress on the ocean environment, prey, and the natural resources these species depend on, any drones use that result in disruption of resources would further exacerbate the stresses. There have already been plenty of examples of drones disrupting nesting birds on the coast. OPRD's climate change strategy adopted in 2021 acknowledges that climate change is a "stress multiplier" that exacerbates existing political, economic, social, and environmental tensions throughout Oregon. It also says that OPRD will: Support robust functioning of Oregon's terrestrial, aquatic, coastal, and marine ecosystems as the climate changes. We will not be able to support these systems and species with further disruptions from drones.

State Park's own policies about sustainability found in the 2013-2017 Oregon Statewide Comprehensive Outdoor Recreation Plan note the following relevant goals for enhancing visitor's Social Interaction with the Natural Environment, most which would be contrary to having drones in the parks:

- Provide outdoor spaces designed and operated to encourage social interaction. Enhance the public's physical, mental, and social well-being by providing opportunities to interact with nature.
- Create volunteer opportunities for the public to be directly involved in the protection, maintenance, and enhancement of natural and open space areas.
- Provide public access to parks, recreational facilities and open space areas for all members of the community.
- Promote ecological values among Oregon residents through public education and interpretation of park and open space features.

Drone pilots have plenty of other places they can launch and retrieve their drones, without disruption the millions of visitors who come to the parks for other reasons and the natural resources these parks protect. Unless there is a special reason that a drone is necessary to be launched and retrieved within a State Park, it simply shouldn't be. Special use permits would be sufficient to take care of those needs.

Thanks for your attention.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Friday, April 1, 2022

**Commenter name (if provided):**

Florence Prescott

**Commenter email (if provided):**

foncyprescott@frontier.com

**Public comment:**

To whom it may concern:

Thank you so much for the opportunity to comment on drone use in Oregon's State Parks. As someone who visits at least three of our state parks several times a month here on the south coast looking for high quality natural experiences such as bird and sea animal watching and enjoying the peace and quiet in these beautiful natural areas, I wish to state that I am opposed to the use of drones at state parks.

The loud buzz and startling, irritating presence of these machines is an unwanted invasion for anyone attempting to privately and peacefully enjoy the splendor of our wild places. The risk to wildlife, especially nesting birds is tremendous in a time when we are seeing massive reductions in wildlife populations and must not be tolerated. I know that the Black Oystercatcher nesting population, for one, was disrupted many times last year by drone activity.

Please outlaw the use of drones in state parks and beaches.

Sincerely,

Florence Prescott

Port Orford, Oregon





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, April 1, 2022

**Commenter name (if provided):**

Pat Chewning

**Commenter email (if provided):**

pchewn@comcast.net

**Public comment:**

The attached PDF file is for my presentation for the public comments Zoom meeting of 3/30/22 for "Drones".

[Note: Your attachment was received and will be included in the public comments posted later this afternoon. Thanks!]

# Oregon State Park Rules for Takeoff & Landing Of Drones

## Proposal to add "[motorized](#)" to Drone Definition

- Submitted for Public Comments 2/15/2022 thru 4/7/2022
- Submitted for Public Hearings of 3/30/2022 and 3/31/2022
- by Pat Chewning ([pchewn@comcast.net](mailto:pchewn@comcast.net))

# Introduction and History

- Tradition of flying unmanned objects on Oregon Ocean Shores and State Parks
  - Kite Festivals, Frisbee Golf, Frisbee on the beach
  - Model gliders from dunes, cliffs, and flatlands.
- Complaints and problems started with the recent introduction of Drones (motorized).
- Recent OSP rule-making meetings (11NOV21, 24JAN22) included the word "motorized".
- 2/15/22 Rule wording removed the word "motorized" to avoid "specifying Drone Technology".
- "Noise, Buzzed, Loud" appear 190 times in comments thru 3/25/22. (Motorized noise)

# Drone Definition Is Too Inclusive

- Referenced Definition:

*ORS 837.300(4) “Unmanned aircraft system” means an unmanned flying machine, commonly known as a drone, and its associated elements, including communication links and the components that control the machine.*

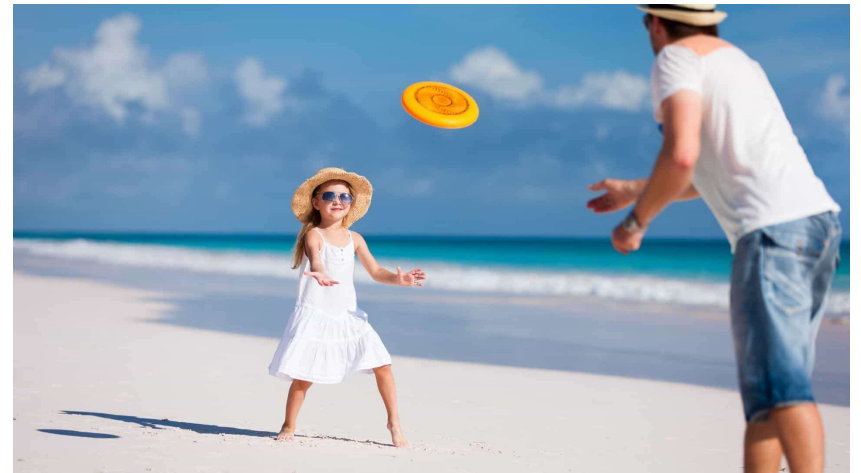
- Unmanned (kites, balloons, model gliders, frisbees are not manned)
- Flying (kites, balloons, model gliders, frisbees do fly)
- Neither the Parks Dept nor the Legislature intends to regulate these non-drone devices.
- These devices are not drones, are not problems

# Drone Definition Should Include



- Drones
  - Motorized (Noisy, ability to hover, ability for sustained long-distance flying, often flown out of sight of operator. Often includes camera)

# Drone Definition Should Not Include



- Non-motorized (Silent flight, cannot fly long distances from operator, flown in sight of operator. Seldomly includes camera)

# Proposed Drone Definition Language

## 736-010-0015 Definitions

(26) “Unmanned Aircraft System” means  
motorized device defined under ORS 837.300(4).

## 736-021-0015 Definitions

(26) “Unmanned Aircraft System” means  
motorized device defined under ORS 837.300(4).



# Consistent with Existing Park Rules Language

## Oregon Administrative Rules

### Rule Text Search Results

Your search for motorized (exact match) OR motor (exact match) returned 30 results.

[New Search](#) | [Modify Search](#)

Rows per page: 25   Page 2 of 2  

Rule Number	Rule Title	Chapter Name
<a href="#">736-010-0015</a>	Definitions	Parks and Recreation Department
<a href="#">736-015-0040</a>	Miscellaneous Rentals and Products	Parks and Recreation Department
<a href="#">736-040-0048</a>	Wallowa River Scenic Waterway	Parks and Recreation Department
<a href="#">736-015-0006</a>	Definitions	Parks and Recreation Department
<a href="#">736-015-0020</a>	Overnight Rentals	Parks and Recreation Department

- "Motorized" or "Motor" already appears 30 times in the OAR rules for State Parks



# Proposal Does not Impose an Undue Burden to Discern "Drone Technology"

- Park personnel can already distinguish between cars and bicycles, surfboards and motorboats, etc... (motorized and non-motorized vehicles and watercraft)
- Park personnel should be able to easily distinguish between motorized Drones, and non-motorized flying devices. (Noisy vs silent, propeller-driven vs no propellor, etc.)

# Summary

- The existing definition of a drone in the proposed rule language is too inclusive.
  - It would include non-motorized unmanned flying devices such as kites, frisbees, model gliders, balloons, etc.
- The correct definition of a drone adding the word "**motorized**" would exclude the devices that are not drones and not causing problems.
- The use of the word "**motorized**" is consistent with existing park rules and does not create a burden to distinguish drone technology.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 31, 2022

**Commenter name (if provided):**

Phil McLaughlin

**Commenter email (if provided):**

skyelight728@gmail.com

**Public comment:**

Do height and length of hovering restrictions outside the parks in private property apply to drone uses in state parks? I can see the flying and noise would be just as much a problem as where they land and take off. Your proposed and existing rules are pretty vague, I assume, for flexibility in administering restrictions and uses. Bottom line: keep in mind that in places of natural beauty and quiet drones are obtrusive just by their nature, even with courteous operators. Probably need to revisit this regularly after more experience.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, March 31, 2022

**Commenter name (if provided):**

Jan Hodder

**Public comment:**

I am a marine scientist who has lived on the Oregon coast for the past 40 years. I am writing to say that I am strongly against allowing unregulated use of drones in the coastal State Parks and on our beaches and seashore. It is unacceptable that the agency entrusted with parks and beaches says that these drones can go anywhere that they are not explicitly prohibited.

I have seen what unregulated drone use on the Oregon coast can do. Nesting birds are disturbed; this allows gulls, crows and ravens to eat the unattended eggs or nestlings. Sleeping seals and sea lions are awakened; a violation of the Marine Mammal Protection Act. I have been "surveilled" by a drone while just walking along the Coos County beaches which makes the experience less than enjoyable. It is in essence an invasion of my privacy, as I have no idea if I am being photographed, and if I am where those images will be shared.

I urge you not to sacrifice the quality of the park and shore experience for the vast majority of people. I suggest that State Parks convene an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts.

I am also concerned about State Parks ability to enforce the any rules regarding drone use. In my experience with the Cape Arago State Parks there is barely enough park personnel to keep the bathrooms open, or the cliff side trails safe for walking due to landslides. If State Parks allows drone use it is imperative that they include a strong enforcement mechanisms in final rules.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 31, 2022

**Commenter name (if provided):**

Kathy Butterfield

**Commenter email (if provided):**

kathy.butterfield7@gmail.com

**Public comment:**

Many coastal drone owners do not seem to understand the impact their coveted photos cost our bird populations. (I have seen herds of elk running from drones on Facebook too.)

Please strongly regulate drone usage here on the coast. Our birds have a hard enough time as it is.

Kathy Butterfield  
Gleneden Beach



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, March 31, 2022

**Commenter name (if provided):**

Joanne Cornelius

**Commenter email (if provided):**

jkcornelius@charter.net

**Public comment:**

I live next to the Falcon Cove Marine Reserve in a small community and have experienced drones flown along our shore and in front of my house which is annoying because of the invasion of privacy. This community has many shore birds, eagles, pelicans, etc. that are disturbed by drones. It is a very small community and yet with the increased tourism advertising many more come to this secluded beach area. Drones in this area should not be allowed over the beach. I am in favor of State Parks passing rules regarding Drones.

Joanne Cornelius  
Arch Cape, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, March 31, 2022

**Commenter name (if provided):**

Susan Nunnery

**Commenter email (if provided):**

dowvjon@gmail.com

**Public comment:**

Hello,

My wife and I have stayed at five or more Oregon state parks in the past five months. We enjoy the serenity, quiet and beauty of nature unfettered by human activities, other than camping. We believe that permitting drones in public parks would be a terrible intrusion and a violation of the parks intention and purpose. There is also, of course, substantial risk to the animal inhabitants.

On a visit last year to battle Ground Lake State Park in Washington, we witnessed a person operating a high-speed remote controlled speedboat on the small lake scaring animals and creating a tremendous nuisance. I would hope that kind of activity never happens in Oregon.

Thank you,

Downer Johnson

Susan Nunnery



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 31, 2022

**Commenter name (if provided):**

Kate Saunders

**Commenter email (if provided):**

katefsaunders@gmail.com

**Public comment:**

I support all restrictions on using state beaches for taking off and landing of drones. These activities should be researched carefully by qualified scientific experts, and if drone activity in sensitive areas is disturbing to any birds all drone activity should be restricted. Please take this matter into serious consideration.

Thank you,  
Kate Saunders  
Neskowin, Or.





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 31, 2022

**Commenter name (if provided):**

Donovan Burns

**Commenter email (if provided):**

dfburns2002@gmail.com

**Public comment:**

I have been visiting the marine gardens and parks for years now. And most times I go there is somebody with there drone, and with it, I see drones get stuck, crash, and disturb the delicate ecosystems around them. Each time it is truly disheartening. It is my belief that these parks and marine gardens should have ample clearance from drones. Not just a rule of not disturbing the wildlife, but not letting drones take off or land close enough for them to disturb the birds.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Thursday, March 31, 2022

## Commenter name (if provided):

Paula Gordinier

## Commenter email (if provided):

pgordi2@gmail.com

## Public comment:

My comments on proposed drone rules are based on the Oregon Parks and Recreation Department mission statement: to provide and protect outstanding natural, scenic, cultural, historic and recreational sites for the enjoyment and education of present and future generations.

The draft rules as proposed are in direct conflict with this mission.

I would prefer recreational drones be banned from all public areas but realize this is not likely to happen and would not be enforceable even if they were. Obviously drone users with non-recreational, health, safety, search and rescue, fire surveillance, or scientific research can work directly with appropriate park personnel as needed to operate safely with minimum damage to the park or diminishing the experience of other park users.

Please revise OAR 736-010-004 (9) OAR 726-021-0100 to reflect the values state in your mission statement. At a minimum

- 1.Re-revise OAR 736-010-004 (9) to prohibit drone use except in specified areas—the opposite of what you are proposing at this point: (9) taking-off or landing an unmanned recreational aerial vehicle, drone or similar device is prohibited except for those areas of any park property or portion of a park property specified on the “UAS operation zone” map published on the state park website.
- 2.Require registering for use in designated areas.
3. Require damage deposits from all drone users.
4. Clearly post where drone use is not permitted with reporting information where all park users can see both a definition of abuse including harassing birds and animals as well as humans, and noise pollution, and the process for reporting.
5. Impose meaningful fines that can be collected and will act as incentive to discourage bad behavior.

Regarding (10), there is no park in the state big enough to accommodate 50 drones without disturbing natural, scenic, recreational resources or adjacent areas that parks are designed to protect. Any group of 50 drones cannot not disturb natural, scenic, recreational resources. Let drone users rent a more suitable venue that can accommodate their activities. Maybe appropriate drone zones are those that have already been so compromised that they will not be noticed—motocross courses, near ATV and snowmobile trail areas where the wildlife has already been run off.

For many people state parks are the only places large enough to actually get away from the relentless motor noises and hear running water, breezes in trees, bird calls, frogs-- all the things that are totally drowned out in most of our daily lives. Please continue to support those places where this is still possible and accessible



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, March 31, 2022

**Commenter name (if provided):**

Christine Hall

**Commenter email (if provided):**

seethelight979@gmail.com

**Public comment:**

To Public Officials and State Park Personnel:

Visitors from all over the world and US visit our pristine Oregon Coast. I know, I live across from the Face Rock State Park in Bandon, Oregon. License plates abound from all over US and Canada. Tour buses bring international travelers. Groups of bicyclists travel down the coast to California.

People don't come to our Coast to hear drones. I can hear the sound of drones from Face Rock. People want to hear the sounds of the ocean waves, not the sound of a drone overhead. Who wants to be filmed when walking on the beach? Some things need to be kept off-limits in our world of noise and chaos and that is our Oregon beaches.

Please no drones on our beaches or State Parks. My husband and I have hiked many trails in our State parks where we were the solo hikers. It is a thrill to hear the silence interrupted by the simple sound of branches rustling or a bird singing.

We don't need drones in any of Oregon Parks.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, March 31, 2022

**Commenter name (if provided):**

Beverly Peterson

**Commenter email (if provided):**

bevpeterson14@yahoo.com

**Public comment:**

Hello,

Thank you for this opportunity to comment on this rule.

I would strongly suggest that all drone takeoffs and landings be banned at state parks and beaches, most especially in areas where there are nesting birds. Many populations are declining and the parents can be scared from their nests by drones, and abandon their eggs or offspring. The snowy plovers at South Beach are also disturbed by people walking the beach. I would also like to see paragliders banned at headlands during nesting season (if they aren't already) as they appear to be large predators.

In addition, visitor experience is negatively impacted by the buzz and sight of drones overhead.

I agree with the suggestions as laid out by the Portland Audubon Society and urge you to adopt them.

Thank you,  
Beverly Peterson

Attached, my photo of the (new) resident male Peregrine Falcon at Yaquina Head, 3/16/22.

[Note: Your image was received and it will be included with your public comment when we publish it on the OPRD rulemaking page: <https://www-auth.oregon.gov/oprd/PRP/Pages/PRP-rulemaking.aspx> ]









# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, March 31, 2022

**Commenter name (if provided):**

Jim McKinnell

**Commenter email (if provided):**

jimtrudy@comcast.net

**Public comment:**

Dear Oregon Parks and Recreation,

After learning more about the proposed regulations, I support the no drone zones provided they are areas consistent with where drones already shouldn't be flying. Such as sensitive wildlife habitat and over people.

Sincerely,

Jim McKinnell

> On Mar 2, 2022, at 8:05 PM, jimtrudy wrote:

>

> Dear Oregon Parks and Recreation,

>

> As a relatively new drone pilot, I am concerned when read about the move toward "no drone zones." The FAA already has a comprehensive set of regulations which if followed by all recreational and commercial drone pilots would likely minimize the need for further restrictions of drones.

> I have read OPRD plans to post maps of no launch zones on the OPRD website. One concern with this approach, is how will I know I am currently in a restricted space? Does OPRD plan to create an App similar to B4Ufly or Aloft which shows restricted zones, using my phone's location services? I have also read there may be a way to apply for a "special permit" to take off or land within the closed zones. I hope that any special permit either allows for live approval or the permit is in effect for a span of at least several days to accommodate bad weather conditions on the planned flight date.

> This year, I have visited two Oregon state parks with disc golf courses. In the areas where disc golf is played, I have seen signs which read "Caution you are entering a disc golf course watch for flying discs." Rather than creating "no drone launching zones", would it be more effective to create areas of the parks where model aircraft are encouraged and put up caution signs similar to the ones for disc golf?

>

> Sincerely,

>

> Jim McKinnell

> 2512 Daisy Lane NW  
> Salem, OR 97304



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 31, 2022

**Commenter name (if provided):**

kris woolpert

**Commenter email (if provided):**

kriswoolpert@gmail.com

**Public comment:**

Here in Oceanside we enjoy the flights of the eagles and all the comings and goings off the 3 Arch Rocks National Wildlife Refuge. People live and come to hear the waves, to fly a kite, to take refuge from city noises. Please leave this area in peace. Thank you, Kris Woolpert, resident





# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Thursday, March 31, 2022

## Commenter name (if provided):

Daniel Tucker

## Commenter email (if provided):

tucker.dan@comcast.net

## Public comment:

Will this rule be added to the current OAR 736-010-0440(9) or will it replace that section. The current rule reads: "(9) A person may only distribute circulars, notices, leaflets, pamphlets or written or printed information of any kind within a park property after they have first obtained permission from the park manager and reported their name, address and number of leaflets to be distributed."

The current section (9) would not read well.. "cannot distribute leaflets or fly drones" ???

Have any studies been done on the noise levels of drones and comparing them to other human activates? What is an acceptable decibel level? Would this level only apply to drones? Why is this not defined in the proposed rule?

How many drone related instances were reported to the State? I am sure there are records of complaints. If there is a problem there should be documentation to back it up.

We should be seeing a detailed risk assessment of drone use.

Rules should not be created based off of perceptions, emotions, or isolated instances. Hard data needs to be collected and rules need to be based on that data.

The proposed rule does state the 'restricted' zones will be published to the state park website, but it does not state who has authority to restrict those zones or how those zones are determined.

I welcome common sense rules and guidelines, they need to be clearly defined and not unfairly single out a group of park visitors.

- \* Drones leave no footprints,
- \* Drones do not litter,
- \* Their 'noise pollution' is minimal and brief.
- \* The fact that many have cameras has ZERO impact on our natural world. Every park goer carries a camera.

I propose requiring a permit to take-off and land in any state park, that the permit process be automated on the state website, and that restriction parameters be defines in the system. Even permitted drone operators would have to follow all other park rules.

This would allow:

- \* An additional tool for enforcement "Can I see your permit"
- \* A tool for state parks to gather data on where drones are being used.
- \* Signs would need to be limited to 'Drone permit required' with QR code to the website.
- \* It would allow more detailed restrictions and the ability to limit the number of permits to an area.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, March 31, 2022

**Commenter name (if provided):**

Michael Edwards

**Commenter email (if provided):**

medwardsnewportbeach@gmail.com

**Public comment:**

Hello, I live in Lincoln City, near several productive tide pools which are near state parks and parking areas. The off shore rocks, if I understand it right, are part of the Oregon Islands Wilderness. The rocks are breeding grounds for a variety of seabirds to include but not exclusively murre, oystercatchers and cormorants. When these seabirds are frightened, say by drones, they abandon their eggs and those eggs are often eaten by gulls. Seabirds are already increasingly impacted by acidification in the ocean, garbage and dwindling bait fish stocks, increased drone traffic on the beach will increase this stress on seabirds. Please protect Oregon's seabirds by strictly regulating the use of personal drones. Thank you.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Wednesday, March 30, 2022

**Commenter name (if provided):**

David Demmner

**Commenter email (if provided):**

badgers3432@gmail.com

**Public comment:**

Please keep open the parks for drones flights. I love the things even though I don't fly.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Wednesday, March 30, 2022

**Commenter name (if provided):**

Dave Grall

**Commenter email (if provided):**

gralldave@gmail.com

**Public comment:**

Drones are a great mechanism to get people outside, enjoying and photographing nature. The videography can be amazing to see. The reality of drone flight time is only 15 - 20 minutes depending on the type of drone.

My argument would be if you are to ban drones, audible music should be banned, photography shouldn't be allowed and the number of people allowed at a state park should be considered.

Drones are just an evolution of technology and a different way for some people to access and enjoy the outdoors.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Wednesday, March 30, 2022

**Commenter name (if provided):**

Linda Fink

**Commenter email (if provided):**

[linda@fink.com](mailto:linda@fink.com)

**Public comment:**

Thank you for providing an opportunity for those of us who use Oregon beaches to comment on drone use.

I have been monitoring nesting success of Black Oystercatchers, that nest on the close tidal rocks along the coast, since 2007, first for USGS and now for Portland Audubon. It has only been the last few years when drones have appeared and their flight over Black Oystercatcher (BLOY) nests has been a disaster.

BLOY come off the nest at any disturbance in the air above them to chase off the "predator" or escape themselves. Drones to them are no different than an eagle or Peregrine Falcon or any other predatory bird. When the eggs are exposed, gulls often move in to eat the eggs. If the parents are off long enough, the eggs get chilled and do not hatch.

BLOY are listed as "birds of concern". Although their population is holding steady on the south coast, up where I monitor it has dropped precipitously.

Please keep drones away from offshore rocks where Black Oystercatchers nest. My survey areas are Road's End and Cascade Head, which are all part of a Marine Reserve area. At the very least, outlaw drones in Marine Reserve areas.

Thank you,

Linda Fink



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Wednesday, March 30, 2022

**Commenter name (if provided):**

Betsy Bredau

**Commenter email (if provided):**

bbredau@gmail.com

**Public comment:**

I absolutely oppose the use of drones by private parties in any public lands or air space. They are a menace to all and a life-threatening danger to wildlife.

Thank you for the opportunity to submit my comment.

Sincerely,

Betsy Bredau

Newport, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Wednesday, March 30, 2022

**Commenter name (if provided):**

Richard Emery

**Commenter email (if provided):**

rsemery1@mac.com

**Public comment:**

My wife and I are Portland, OR residents. Thank you for providing this opportunity to comment. On occasion, the tranquility of our visits to Oregon's most beautiful parks has been disrupted by drones. We recommend all state parks and beaches prohibit the use of drones.





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Wednesday, March 30, 2022

**Commenter name (if provided):**

Leonard Cassidy

**Commenter email (if provided):**

lmcjr.fun@gmail.com

**Public comment:**

Thank you for this proposed rule. As a FAA Part 107 certified UAS pilot I believe this rule to be a fair compromise that addresses concerns and continues to support freedom and fair use.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Wednesday, March 30, 2022

**Commenter name (if provided):**

Scott Sperley

**Commenter email (if provided):**

sperley@hotmail.com

**Public comment:**

I would like to say as a native oregonian I am in favor of Regulation of UAV 's to protect our wildlife, and public safety. While there has never been a fatality from quadcopter in the United States there was one from a UAV helicopter in which the operator killed himself about 6 years ago in the Midwest I believe. I understand that there are certain areas which should never should never allow operation due to sensitive wildlife situations. There are also areas which change throughout the year due to nesting birds. There should be rules similar to that of the ODFW and the rules for fishing that change depending upon the time of year. The federal migratory bird act protects all migratory birds throughout the year but is seldom if ever enforced. Just as leash laws for dogs in parks are seldom enforced even though it is a state law anywhere in the state not just parks. Places like Smith Rock I think should have signage stating drone operators must comply with part 107 of the FAA or face confiscation of equipment, fine and imprisonment. This should be enough to protect climbers from is from dangerous drone operators. I have friends that climb and would love to have drone footage from a safe distance. I am afraid of heights but would love to see my friends climbing from a safe distance away, not above and in accordance to part 107.

I do not envy your position and it will be difficult to find a balance to protect wildlife while still allowing Drone operators and those with handicaps to appreciate the beauty of Oregon parks that they might not otherwise be able to see. I think signage, and training for both park staff and law enforcement is critical to the overall objective.

Thank you for your consideration and time.

Scott Sperley



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Wednesday, March 30, 2022

**Commenter name (if provided):**

Mark Dierbeck

**Commenter email (if provided):**

mldierbeck@gmail.com

**Public comment:**

Just say no to drones in State Parks....The world is noisy and busy already. Adding drones is just obnoxious.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Wednesday, March 30, 2022

## Commenter name (if provided):

Alex Derr

## Commenter email (if provided):

alex1derr@gmail.com

## Public comment:

Drones are stressful to wildlife and annoying to humans. Enforcing no-fly or permit-only drone zones is very difficult, so we need a policy that is easy to understand and comply with. Our National Parks, for example, have a very simple policy: No Drones. If someone is flying a drone in a National Park, they are flying illegally and everyone knows it. Reporting and enforcement can be made swiftly and with confidence.

Drones are fun for the individuals flying them. Others may enjoy the aerial views later on YouTube. But while it's flying, the drone annoys other visitors and stresses wildlife. Drones are obtrusive. They do not belong in our State Parks.

There are plenty of other places to fly drones. Please prohibit the use of drones in our State Parks.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Wednesday, March 30, 2022

## Commenter name (if provided):

Tim Halloran

## Commenter email (if provided):

timhalloran@live.com

## Public comment:

I am starting my 11th year monitoring the tufted puffin colony at Haystack rock Cannon Beach Oregon. I often see drones near the colony and they have the potential to cause havoc resulting in breeding failure. This is especially true during the summer breeding season. But it is also a problem throughout the year because some of these birds will be exploring potential breeding territory in late winter and throughout the spring.

For example black oystercatchers spend time in their breeding territories during the winter. If they are harassed, they will not likely stick around to breed. The two species I've mentioned has been in decline for years for a variety of reasons.

For example black oystercatchers spend time in their breeding territories during the winter. If they are harassed, they will not likely stick around to breed. The two species I've mentioned have been in decline for years for a variety of reasons. They don't need drones to make the situation worse.

Drone operators have always been cooperative when I have talked to them. They would appreciate clearly communicated guidelines.

Please keep drones off our beaches.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Wednesday, March 30, 2022

## Commenter name (if provided):

Stewart Holmes

## Commenter email (if provided):

sholmes714@gmail.com

## Public comment:

I am an active hiker, mountain biker, kayaker and beach walker. I spend many months a year in Oregon state and local parks, beaches, mountains, etc. One of the reasons I spend so much time in these places outdoors is because they are the only places in Oregon where there's even the slightest chance I'll find some peace and quiet. Even there the presence of airplanes is always an unwelcome intrusion let alone other hikers with loudspeakers on their backpacks playing their (not my) favorite tunes.

Allowing drones to enter the airspace in any of the places covered by this "code" would be an anatema for the simple reason that there is no way that drone users will abide by the rules, regardless of the potential fines and other penalties, including jail time. No way!!! It seems like no matter where my wife and I spend time outdoors – state and local and national and other recreation areas – we encounter drones being flown illegally. We went to several National Parks over the last couple of years in the Moab area and even there, where there are signs posted everywhere about "No drones, no where, no how" there were still drones. It's sort of like telling mountain bikers no mountain biking in these sensitive areas. The rule is "catch me if you can and I know there aren't enough of you to do that!"

If the state legislature would pass a funding bill simultaneously, along with this rule change to allow drone take off and landing, that would provide enough funding for another 1000 rangers and a REALLY still mandatory fine, loss of drone and loss and permit to fly for at least five years, and mandatory jail time for offenders AND the requirement that all drones broadcast their location on a "ranger" frequency then I might vote OK. Give that that's not no feasible I vote NO DRONES, NO WHERE, NO HOW!



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Wednesday, March 30, 2022

## Commenter name (if provided):

Amy Williams

## Commenter email (if provided):

oregonamyk@gmail.com

## Public comment:

I believe drone flying should be tightly limited in all state parks and beaches to individuals holding commercial federal FAA drone licenses. Licensees have made the efforts necessary to educate themselves to be responsible drone operators.

Even with that limitation, no one is going to pay attention to no-fly zones.

As a coastal resident, I regularly witness drone operators crawl over coastal fences, disrupt seabirds and walk across nesting grounds. Small children are hoisted over coastal fences to run around on unsafe basalt cliffs.

And don't get me started to the littering issues.

When I remind people they are in areas they aren't supposed to be (they climb over clearly marked barriers), they usually ignore me or glare at me.

We live in a time when "bad" behavior is tolerated, and personal entitlement remains extreme. Regrettably, that makes governmental entities' jobs much harder. While you cannot police individual inappropriate behavior, you can lessen the cavalier human damage to nature by enacting restrictive drone regulations.

Wildlife, waterfowl and tree-dwelling animals are more important than capturing a shaky drone shot, or chasing a seabird with your drone.

And please- increase patrol presence at coastal turnouts, especially on the weekends. They are filthy.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Wednesday, March 30, 2022

**Commenter name (if provided):**

Ronald Sonnevil

**Commenter email (if provided):**

rsonnevil@gmail.com

**Public comment:**

I believe that drone use should be banned from Oregon State Parks unless permitted for a specific instance. I am a drone owner and enjoy using mine but drones are extremely annoying to me when I hear and see them in public natural areas such as state parks. I strongly believe that drone usage in Oregon State Parks is highly disruptive to park visitors and wildlife. If drones are prohibited from National Parks, wilderness areas and other popular federal lands why can't they be prohibited from Oregon State Parks too? Limiting taking off and landing to a specific portion of a park will not restrict drone useage outside of that area and will be very disruptive to park users and wildlife. It will also result in an increase in lost drones or drone crashes within state parks because drone flyers launching from a specific area will push and exceed the limits of the drones' capabilities by flying into popular areas where they are not allowed to launch from.





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Wednesday, March 30, 2022

**Commenter name (if provided):**

Teri Spencer

**Commenter email (if provided):**

tbspencer8@gmail.com

**Public comment:**

Thank you for this opportunity to submit a comment on the evolving issue of drone impacts on Oregon coast wildlife. I am an 8 years resident of Bandon, and spend many hours on our beaches each week. I am personally witnessing a significant increase in adverse impacts unregulated drone use has on local shorebirds and seabirds every year.

I am especially concerned with the very frequent drone flying during the shorebird and seabird breeding/nesting season, when avian "species of concern" such as Tufted Puffins and Black Oystercatchers nest on our offshore rocks. During the months of April through August, while incubating their eggs and rearing their nestlings, these bird parents do not distinguish a drone from a predator bird, and will leave their nest to chase the presumed predator, leaving their eggs/nestlings completely vulnerable to predation. While monitoring Black Oystercatchers for the Oregon Black Oystercatcher Project, I see this happen numerous times every year, as Black Oystercatcher parents both aggressively chase after drones as far as 1/2 mile, staying away from their nests for up to 15 minutes. Knowing that I am only monitoring the Black Oystercatcher nests a minimal fraction of the time the parents are incubating and rearing there, makes one fear just how frequently drone disturbances actually occur, and how much such events contribute to the nest "fail" rate.

I also want to state that, although the proposed legislation seems to focus primarily on the drone take off and landing locations within the state parks and beaches, serious consideration should be given to restricting the flight paths over all wildlife locations. I am in favor of banning all drones flown over beaches and offshore rocks that are known seabird and shorebird nesting grounds during a specific time period of active nesting. I frequently see drones flown from private oceanfront homes that fly over the length of the beach and offshore rocks, forcing the nesting birds off their nests. Once a drone is in the air, the damage is done, so to speak. Chasing down the operator to land it does absolutely nothing to protect the vulnerable wildlife.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Wednesday, March 30, 2022

**Commenter name (if provided):**

Karen Sweigert

**Commenter email (if provided):**

dalkms@gmail.com

**Public comment:**

I think drones should be prohibited from flying over campgrounds and community gathering areas in state parks. Too much invasion of privacy. I would like to see them banned altogether though I doubt that will happen.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Wednesday, March 30, 2022

**Commenter name (if provided):**

Doug Jeffries

**Commenter email (if provided):**

seirffejd@gmail.com

**Public comment:**

I am opposed to the take off, landing and use of drones in Federal and State Parks. This is a situation where the rights of many need to be considered against the rights of a few. Drones are loud, intrusive, and a safety hazard when improperly operated (and remember there is no training certification or licensing requirement to purchase or operate a drone). I have personally witnessed a drone operator fly his drone very close to an osprey nest, causing both parent birds to leave the nest. People go into national and state parks for quiet relaxation, to see beautiful scenery in it's natural setting - and a noisy, high pitched drone ruins that experience.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Wednesday, March 30, 2022

**Commenter name (if provided):**

Todd Dunkirk

**Commenter email (if provided):**

todd.dunkirk@gmail.com

**Public comment:**

Allowing drones in parks at all is problematic for me, in that the technology already in peoples hands - primarily smart phones - keeps them focused on their own experience, rather than being considerate of the experience of others nearby. Adding a remote device to further disrupt experiences potentially well away from the pilot, seems ludicrous. What's next? RC cars are allowed on trails and in parks for people that can't learn how to fly a drone?

How are any of these rules being enforced?



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Wednesday, March 30, 2022

**Commenter name (if provided):**

Michael Eisele

**Commenter email (if provided):**

lameisele@hotmail.com

**Public comment:**

treat drones like dogs.

1. must be 'leashed', ie in sight and direct control.
2. use only in designated areas.
3. only in designated hours.
4. prohibited in areas that require permits for other recreational activities, eg climbing.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Tuesday, March 29, 2022

**Commenter name (if provided):**

Lloyd Vivola

**Commenter email (if provided):**

nouveladam@hotmail.com

**Public comment:**

I am writing to voice my support for the formation of an independent working group, one that comprises diverse expertise and perspectives, to address the need for an ecologically sound and fair way to best manage the use of drones at Oregon State Parks and Beaches.

As someone who regularly visits federal lands to conduct wildlife surveys with Cascadia Wild - in partnership with ODFW and the U.S. Forest Service - I know how important the restricted use of ATVs can be for enhancing the well-being of natural systems and resident species.

Areas where ATV use is prohibited or firmly regulated also assures the enjoyment of nature-enthusiasts who pursue a tranquil outdoor experience. A case in point: the ATV-prohibited sections of the Oregon Dunes National Recreational Area.

Accordingly, a conscientious management plan for drone use at Oregon State Parks and Beaches is imperative toward enhancing the protection and good health of avian populations in particular. The plan should also consider the needs of amateur birders and the economic value intrinsic to birding tourism as it applies to local communities.

In general, any finalized plan would be wise to assert that drone use at Oregon State Parks and Beaches be prohibited except where explicitly allowed. Accurate mapping of permitted drone-flying areas should be part of a public relations campaign that informs and educates the public on the rules and benefits of no-fly zones as well as the penalties for non-compliance.

Most critical, the need for sufficient no-drone take-off and landing buffers at bird-nesting sites and seal-pupping areas must be regularly reviewed, assigned, and integrated into a master plan in accordance with the latest scientific data.

Oregonians do best when they come together to share knowledge and experience in the cause of effective policy-making. Sincere thanks for receiving public comments on this important issue.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Tuesday, March 29, 2022

## Commenter name (if provided):

Diane and David Bilderback

## Commenter email (if provided):

ddbilderback@gmail.com

## Public comment:

Thank you for the opportunity to comment on the draft rules for drone take off and landings on State Parks and Ocean Shores. We are retired biologists and avid birders who have been volunteer monitors for various agencies and a conservation organization (USGS, USFW as well as Portland Audubon) that have been monitoring Black Oystercatcher reproduction from 2006 to present. Besides watching Black Oystercatchers, these years of monitoring have given us lots of observational experience with many of the marine colony nesting birds (Common Murre, Tufted Puffins, Brandt's Cormorants, Pelagic Cormorants, Double Crested Cormorants, Western Gulls and Pigeon Guillemots) along our south coast Oregon rocky shores.

In the early years of our monitoring, we never saw any human interactions that would cause these nesting birds to fly off their nests. However, once drones became available to the public, we started to witness bird harassment by drones. Three years ago, it was only every few weeks during the summer, and now it has become rare that a week will go by without seeing this type of harassment during the bird nesting season. We have witnessed the devastating impacts of drones as they trigger the protective and territorial behavior of these nesting seabirds. Black Oystercatchers will leave their nests and chase drones just as they would a Peregrine Falcon, but unlike the falcons, drones persist in the area, and so, the birds can be off the nests for a long time (over 30 minutes) leaving either the eggs or young chicks open to predation by Ravens, Western Gulls, and Peregrine Falcons. Also, we have witnessed Black Oystercatchers fly 300 to 400 feet high chasing drones. Normally, these birds only chase raptors up to about 200 feet. Chasing drones at that higher elevation causes them to expend a lot more energy. Drone harassment certainly costs Black Oystercatcher parents a lot of energy that should instead be devoted to raising healthy chicks to fledging. It is not just Black Oystercatchers that are being affected as we frequently observe drones being flown over Elephant Rock and other bird colony rocks off Coquille Point and in the Bandon area, causing all the birds in the colony to come up off their nests and again, subjecting all the nests or fledglings on these rocks to predation.

Often, we can't determine where the drone operator is and can only witness the bird disturbance. If we can locate the operator, we and other monitors have been diligent in approaching drone operators when we witness harassment of birds to let them know that they need to take their drone down as it is illegal to harass birds. Many of them do not understand that it is their responsibility to avoid bird harassment. In fact, one drone operator whose drone was being chased by four Black Oystercatchers told me that it is the Black Oystercatchers that are harassing their drone. Another concern when we have talked with drone operators is that they have checked the FAA website and see that there is nothing that will restrict them flying a drone in our area. They think that they are free to fly. Which by rights is correct, but not to harass birds! From our perspective,

while the FAA governs the flying of drones, opening areas of beaches to drone takeoff and landing close to nesting seabirds will just leave the drone operator open to charges of bird harassment. To stop bird harassment, there must be no drone take off or landings both in State Parks located near the ocean as well as areas of the Ocean Shores that is close to rocky intertidal areas that have nesting colonies of birds. In addition, all areas that have nesting Snowy Plovers must also be closed to drone take off and landings. For these reasons, we request that there be no drone landing and take-off in both Ocean Shores and State Parks from March 1 to September 30. This would enable people to fly drones outside of the critical bird nesting season.

Because we have talked with many drone operators who only rely on what they read on the FAA site, we strongly advise that instead of all drone take-off and landings on State Parks being allowed to be changed so it is closed unless otherwise indicated as allowable. If this language is not changed, we do not think this rule will be enforceable and that bird harassment will continue. We have been very concerned about the process of this rule making. State law requires the advisory committee for the rule making to include all people or agencies that will be impacted by this rule. However, in the first meeting, we were really concerned that there were no representatives from the Oregon Coast National Wildlife Refuge Complex or BLM that manage wildlife that are impacted by drone use. We also were quite concerned that there was no outside conservation organization such as Portland Audubon or American Bird Conservancy, nor was there any cultural or tribal organization. We wrote an email to request that the committee follow the rules and include these groups. While we were delighted to see Portland Audubon and Oregon Shores Conservation Coalition in the second meeting, we were again appalled that it did not include Oregon Coast National Wildlife Refuge complex, BLM or any tribal groups! Oregon Coast National Wildlife Refuge Complex has had years of experience in managing the bird colonies off the Oregon shoreline and will certainly be impacted by this new drone rule. They would have been a vital member of this advisory group! We are quite concerned that the large bird colonies along our coast will be damaged if the drone harassment continues to grow as it will without adequate enforcement! For this reason, we are very disappointed to see the committee not including vital members on their advisory committee during the second meeting.

If the language does not change and all drones are allowed, individual State Park managers need to seek advice from Oregon Coast National Wildlife Refuge Complex, BLM, any affected tribal groups and conservation groups before they make decisions about when and where drones can be used before public review of these decisions.

Careful crafting of a great State Park website that will inform drone users where they can and can not take off or land drones is of the utmost urgency when the rule is being enforced. Signage about an area being closed to drone take off or landings needs to be done with reasons why this is being prohibited such as the need prevent harassment of bird nesting and breeding colonies or for public safety.





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Tuesday, March 29, 2022

**Commenter name (if provided):**

Ken Poisson

**Commenter email (if provided):**

kpoisson@gmail.com

**Public comment:**

Hello Oregon Parks and Recreation group.

Hi, in hearing about the new Oregon parks regulation, I mostly agree that it is a good idea as it stands now.

While some groups want to tighten restrictions, as have been done in some states, I am hopeful that you will not be restricting all drone flying. Most drone pilots are familiar with all the FAA rules for flying and follow these rules as much as possible.

Doing so keeps everyone safe and really does not infringe on other's ability to enjoy nature. Rules in place say you should not fly over others. Pilots familiar with safety procedures will avoid flying low over property or bothering wildlife.

It would really be a shame if the beautiful scenery of Oregon was cut off from those who fly drones, do videography with it or just post their photos and videos to social media. These things only serve to promote Oregon and other areas when people see the results of responsibly drone flying and even many naysayers change their minds when they actually see such results.

Based on my experience with and observation of other drone pilots, we all love seeing and sharing the natural beauty of Oregon and other states and remain dedicated to caring for such places and for the privilege of being able to fly and share experiences of them.

The "Proposed Park Area Rules - DRAFT OPRD Drone Take-off and landing rules." and the current language of letting drones fly everywhere except where identified is a reasonable and acceptable compromise.

Feel free to contact me if needed.

I thank you for your time and I look forward to reading the final ruling!

With Respect

Ken Poisson



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Tuesday, March 29, 2022

**Commenter name (if provided):**

Jeremy Helms

**Commenter email (if provided):**

jdhelms@gmail.com

**Public comment:**

Hello,

As an Oregonian that spends a lot of time camping, hiking, biking and kayaking in our natural areas I'm asking you to please consider keeping Drone Regulations as currently proposed in our State Parks.

Do not limit us to flying in specific areas. Hold UAV pilots accountable for their actions. Use software tools available for authority to monitor and take action accordingly when necessary.

Personally, I see more damage to our state parks caused by cars/trucks, "off grid camping litter", snowmobiles, ATV's, etc. Gas vehicles in general are disgustingly loud and obnoxious but we still allow them everywhere.

Please don't let the loud voices and/or bad offenders cancel us folks who fly for family fun.

I'm interested in observing the way our natural areas look during our lifetime to be able to share with my future generations.

If you've been here long enough to remember the Eagle Creek fires and all the other fires from the past few years that have erased our forests in no time you'll understand the importance of this request.

Let's find a solution through education and accountability vs creating more restrictions.

Kind regards,  
Jeremy Helms  
Milwaukie, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Tuesday, March 29, 2022

**Commenter name (if provided):**

Johanna Dumas

**Public comment:**

Please, consider passing a rule to oppose the use of drones in Oregon State Parks and Oregon ocean shores.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Tuesday, March 29, 2022

**Commenter name (if provided):**

Robert Crump

**Commenter email (if provided):**

bob.crump@yahoo.com

**Public comment:**

On behalf of the Dusters R/C Club we encourage the implementation of this proposed rule. We suggest that model aircraft should be specifically included with drone operation as well. Currently it very difficult to tell where operation of model aircraft is allowed or not allowed. Thank you for the opportunity to provide comment.

Bob Crump, President Dusters R/C Club



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Tuesday, March 29, 2022

**Commenter name (if provided):**

Ryan Holman

**Commenter email (if provided):**

ryan@ryanolman.com

**Public comment:**

Hi,

I would like to ask that state parks are for all and should be open to fly as long as they are FAA pilots either hobbies or commercial. All the Park Ranger has to do is ask for their TRUST Certificate. It makes it easy for the park ranger. Then they aren't expected to know all the FAA rules on flying. If there are areas that need protection, it's not usually all year, have a flight restriction placed or Notices posted just like when beaches are limited or closed to horses or pedestrians during those times. I think we should have learned something from how we treated skate boarders. In my opinion skate boarding might have done more physical damage than most drones will ever, we shouldn't say no to something new just because we aren't interested in it.

Thank You for taking the time to read my email and please be considerate of all the things a legal drone pilot, Hobbist or Commercial has to go through daily even if they cross all the "T's" with the FAA.

Sincerely,

Ryan Holman  
Portland, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Tuesday, March 29, 2022

**Commenter name (if provided):**

Gabrielle Karras

**Commenter email (if provided):**

gk2829@hotmail.com

**Public comment:**

I would like the Oregon State Park for providing an opportunity to describe my personal experience with drones. This is not an experience in Oregon but an experience in Iceland. I was at a public park when someone was using a drone. I was in one of the most beautiful areas in Iceland and someone was using drone and the beauty was gone because of the horrible noise. I ruined my experience of the place. I recommend all state parks and beaches be closed to drone take-off and landings except where they can be safely allowed. And State Parks should determine where to allow drones based on the best available science. They should create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts.

While designated areas are being determined, status quo drone use would continue (i.e. this would not ban all drone use at any time during the process. State Parks should include a final map(s) of designated drone take-off and landing locations on their website In areas that are approved for drone use, include in the rules: No drone take-offs or landing to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas. Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location. All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time. State Parks should include strong enforcement mechanisms in final rules.

Thanks Gabrielle Karras

Eugene Oregon



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, March 28, 2022

**Commenter name (if provided):**

David Harrison

**Commenter email (if provided):**

harrirad@yahoo.com

**Public comment:**

On behalf of the Salem Audubon Society, I am writing to urge you to protect wildlife by regulating drone use in state parks. To protect nesting and migrating seabirds and marine wildlife state parks should be closed to all drone take-offs and landings except where they can be safely permitted. Locations where drones would be allowed should be determined by the best available science. Appropriate locations for drone take-offs and landings should be decided by a working group consisting of agency, academic, nongovernmental, and tribal members in a way that minimizes impacts to wildlife and other recreational users. In areas approved for drone use it should not occur within 100 meters of observed birds and/or known nesting locations as well as seal haul out areas. Reviews of approved drone take-off and landing sites should be done periodically as new information about wildlife distribution and adverse impacts become available. Finally, there needs to be a strong enforcement mechanism to ensure that the rules are followed. Thank you for considering my input.

David Harrison  
Conservation Chair  
Salem Audubon Society



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 28, 2022

**Commenter name (if provided):**

Lisa Brice

**Commenter email (if provided):**

lbhikes@msn.com

**Public comment:**

Please do not allow drones to disturb nesting, feeding or migrating birds on our parks & beaches & BLM land. Of course drones are used in research so that is a different case than harassment.

Thank you.

Lisa Brice





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Sunday, March 27, 2022

**Commenter name (if provided):**

Ed Rutledge

**Commenter email (if provided):**

ebrutledge@gmail.com

**Public comment:**

Comments for OPRD Proposed Rule re: UAS devices ("drones")

The Draft Rule is the product of thoughtful consideration, the balancing of interests and concerns and establishes a reasonable foundation for how best to further regulate certain activities associated with drone piloting/remote aerial photography on properties administered by the OPRD. I support the adoption of the Draft Rule.

I am a semi-professional photographer. My content has been used by the Oregon Department of Human Resources, the Cascades Volcano Observatory (CVO), the Civita Institute (Italy), the Omey Group of Churches (Ireland), the Vashon Nature Center and other government or non-profit organizations. I live about 300 yards east of the shoreline in Tierra Del Mar, Oregon on a stretch of the coast located between Cape Kiwanda State Park and Sitka Sedge State Natural Area. So, I have measurable experience with photography, including "drone photography," within and above the parks and beaches to which the Draft Rule would apply. I am also a Part 107 certified "Remote Pilot" that has incorporated drone aerial content into my photographic portfolio for the past six years.

Oregon and Hawaii are unique in protecting the right of access to the shoreline. In Oregon the beach is essential a public right of way within the jurisdiction of the OPRD. Further, this Draft Rule has garnered national attention within the "drone community" and other government entities, including states, counties and municipalities. We have an opportunity to provide balanced guidance to others interested in this matter.

The Draft Rule starts with the fundamental premise that the state cannot assume jurisdiction of what is the national airspace. While this seems simple, the fact is that multiple state and local jurisdictions have squandered their public's resources trying to defend laws and rules which attempted to usurp the FAA's sole oversight on airspace regulation. The Draft Rule prudently avoids trying to regulate that which the state has no authority. The Draft Rule also eschews overreach. Rather than starting with a broadcast ban on an activity, the Draft Rule permits the activity, subject to designated prohibited "take-off and landing zones" which are determined on the basis of relevant criteria. This approach reflects Jefferson's thoughts when he stated, "That government is best which governs least."

OPRD's mission is complicated. It is "... to provide and protect outstanding natural, scenic, cultural, historic and recreational sites for the enjoyment and education of present and future generations."

There will be times when these responsibilities feel internally competing. There will be circumstances when one citizen's recreational interests potentially interfere with another's. OPRD must balance the myriad of interests and concerns for all using valid criteria and thoughtful consideration. The Draft Rule reflects OPRD's mission statement.

The stewardship of Oregon's state parks and beaches also has a commercial impact. Parks like Smith Rock State Park or Cape Kiwanda State Park have established recreational hubs supporting accommodations, dining venues, climbing schools and a hang gliding school. This ancillary commercial activity provides income to small and relatively remote communities and resources for state and local tax/fee revenues which underwrite public services. There are commercial aspects to the piloting of drones or fixed wing RC aircraft as well. This could include commercial scenic photography, wedding photography, and beach front real estate photography.

A number of comments already submitted urge a complete ban of drones in our parks and shoreline. Some of these comments are well-intended – focusing on respect of habitat, etc. Others like, “drones are a public nuisance that disturb the tranquility of the park environment” are closer to angry rants. We need to consider the relative impact the presence of UAS aircraft actually have within our state parks and shoreline. For example, the footprint required for a UAV “take-off and landing zone” is about four square feet. Whereas adding additional parking areas for behemoth motor homes takes multiple acres. The noise emitted by an UAS is easily drowned out by any nearby motorcycles or ATV's. The UAS flying over the beach is far less intrusive than the wet dog jumping up on beach walker. The proposed criteria contained in OAR 736-010-0040 (9)(f) make sense for keeping focused on what is important and separating that from the “angry rants.”

Consideration of the Draft Rule should include a realistic assessment of what is enforceable. I reside near a portion of the beach where motor vehicle traffic is prohibited owing to the presence of a protected habitat. There is a large sign warning motorists the area is closed to vehicle traffic. The sign has had to be replaced and it has been vandalized on multiple occasions. A steel beam sign post had to be installed as the wooden post was sawed off. And, in the past 20 months I have posted nearly 400 photos documenting motor vehicle traffic on the beach where motor vehicle traffic is prohibited. OPRD is obviously challenged by trying to prohibit motor vehicle traffic immediately adjacent to a protected habitat. This suggests a complete ban on the take-off and landing of drones would be prohibitively expensive to patrol and/or constructively unenforceable.

The Draft Rule makes sense. If experience shows it is defective in some way, it can be amended. I urge OPRD to go forward with adoption of the Draft Rule.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Saturday, March 26, 2022

## Commenter name (if provided):

Mollie Anderson

## Commenter email (if provided):

mollie.anderson@bsigroup.com

## Public comment:

Thank you for providing this opportunity to comment. Being an outdoors enthusiast for 50+ years, it is most distressing and annoying to observe and often hear drones - they detract from the quiet nature and disturb the wildlife.

Drones are incredibly useful for many other business uses and recreation, but should be restricted from certain natural habitats.

I agree with the Audubon Society to:

- Recommend all state parks and beaches use of drones be prohibited unless otherwise indicated as allowable or designated take-off and landing areas.
- State Parks should determine where to allow drones based on the best available science
- State Parks should create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts
  - o While designated areas are being determined, status quo drone use would continue (i.e. this would not ban all drone use at any time during the process)
- State Parks should include a final map(s) of designated drone take-off and landing locations on their website
- In areas that are approved for drone use, include in the rules:
  - o No drone take-offs or landing to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas.
  - o Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.
- All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time.
- State Parks should include strong enforcement mechanisms in final rules



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Saturday, March 26, 2022

## Commenter name (if provided):

Nora Polk

## Commenter email (if provided):

nora.mattek@gmail.com

## Public comment:

Thank you for providing this opportunity to comment.

I recommend all state parks and beaches use of drones be prohibited unless otherwise indicated as allowable or designated take-off and landing areas.

State Parks should determine where to allow drones based on the best available science.

State Parks should create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts.

While designated areas are being determined, status quo drone use would continue (i.e. this would not ban all drone use at any time during the process)

State Parks should include a final map(s) of designated drone take-off and landing locations on their website.

In areas that are approved for drone use, include in the rules:

No drone take-offs or landing to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas.

Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.

All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time.

State Parks should include strong enforcement mechanisms in final rules.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Commenter name (if provided):**

Steve Davis

**Public comment:**

I support this proposed rule.

FAA Remote Pilot sUAS Part 107

**Date comment received:**

Saturday, March 26, 2022

**Commenter email (if provided):**

steve.davis@starperformer.org



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Saturday, March 26, 2022

**Commenter name (if provided):**

Tim Metz

**Commenter email (if provided):**

ztimenow@protonmail.com

**Public comment:**

Good Afternoon.

I would like to thank you very much for changing the drone rules to allow reasonable recreational drone use in Oregon State Parks. The parks have beautiful scenery, and just like people with ground cameras and cell phones, many people use drones to take those photos for their personal enjoyment and to capture memories. I have read many of the negative comments that have been previously submitted and it appears that many of those commenters have had no or limited experience with the many advantages that drones provide to park users.

If drones are restricted to approved areas, that opportunity is gone. That would be like prohibiting someone from using the phone to take photos except in designated areas. There would be many missed opportunities to show off the beauty of these areas and provide a positive economic benefit to the state.

By designating non-drone areas (as there should be), you've opened much more area for us to fly and take photos. Drone should not be used in crowded areas (parking lots, campgrounds, etc.) and should have seasonal closing for nesting and such. But by allowing to fly everywhere else (within FAA regulations of course), you've developed a very fair and equitable system for all to enjoy your parks.

I realize that you have a difficult job in balancing the wants and wishes of the diverse users of the park system. I believe that the regulations your agency has proposed are reasonable and balanced in your approach.

I may not be a citizen of Oregon, but I do travel extensively for business and pleasure and will be looking forward to bringing my drone on my next visit there.

Thank you again for crafting such reasonable rules. The photography and drone community truly appreciates your work in this.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Saturday, March 26, 2022

**Commenter name (if provided):**

Laska Golden

**Commenter email (if provided):**

whereslaska@gmail.com

**Public comment:**

I am a Part 107 licensed drone pilot, and I live in Vancouver WA. I visit Oregon often for recreation and photography, including drone photography.

I wish to offer my support of the law as it is written.

Drones are great technology and I want to support any/all responsible usage, making sure to respect both my neighbors as well as the environment.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 25, 2022

**Commenter name (if provided):**

Jeff Wood

**Commenter email (if provided):**

piton\_tunica\_0z@icloud.com

**Public comment:**

As a licensed Part 107 UAS pilot as well as professional photographer and videographer I implore vehemently to strike down any state park or coastline curtailment to quadcopter flight operations. As much as I dislike statutes that limit or hinder anyones personal right or freedoms perhaps a different approach may be in order. It may warrant that pilots who have completed the FAA testing and are licensed with either the Part 107 certificate or TRUST card be allowed unfettered access to the parks and beaches in which they fly.

I have witnessed first hand some of the hazardous and dangerous flying that unqualified people who have never read or completed even a rudimentary introduction on safe and diligent flight operations and they have given the industry a bad name due in part to this type of negligence.

In contrast, fellow pilots that have taken the time and money to complete the necessary courses and became certified as a UAS operator and follow the strict rules set forth, have as much disdain for these people who just bought an inexpensive toy and wreak havoc wherever they fly.

In closing, if the law proceeds forward, I would suggest that only those pilots with government issued certificates (FAA Pt.107 and TRUST) who have demonstrated their responsible and safe flight operations and can display upon request by park rangers, be granted permission to utilize their aircraft and operate within the expanses of our beautiful parks!





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 25, 2022

**Commenter name (if provided):**

Georgia Roelof

**Commenter email (if provided):**

gbroelof@gmail.com

**Public comment:**

Modern technology is a wonderful thing when examined for its FULL affect on our precious Earth. The drones that citizens use in public parks must be monitored for their take off & landing zones, so that they do not adversely affect the wildlife, especially the native birds who rely on specific nesting areas. Please make drone regulations strong enough so that this wonderful coast that we love so much will not be diminished by the invasive abuse of the drone controllers who sometimes do not consider anything but their own right to recreation.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Friday, March 25, 2022

**Commenter name (if provided):**

Nancy Brown

**Commenter email (if provided):**

brownnab@gmail.com

**Public comment:**

Thank you for providing this opportunity to comment on this issue. I support that all state parks and beaches use of drones be prohibited unless otherwise indicated as allowable or designated take-off and landing areas.

Further, State Parks should determine where to allow drones based on the best available science; State Parks should create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts.

While designated areas are being determined, status quo drone use would continue (i.e. this would not ban all drone use at any time during the process)

State Parks should also include a final map(s) of designated drone take-off and landing locations on their website

In areas that are approved for drone use, include in the rules:

No drone take-offs or landing to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas.

Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.

All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time.

State Parks should include strong enforcement mechanisms in final rules. I am a birdwatcher and a member of the Portland Audubon Society. I am distressed to read of the continual loss of habitat for bird populations on our coast and elsewhere in Oregon. Please pass this rule.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 25, 2022

**Commenter name (if provided):**

Andrew Barker

**Commenter email (if provided):**

abarker62@gmail.com

**Public comment:**

I am trained and certified by the State of Oregon and Portland Audubon Society to survey endangered Snowy Plovers and their nests on Oregon State beaches. It is critically important that all state parks and beaches be off limits for use of drones unless otherwise indicated as allowable or designated take-off and landing areas. Nesting species like the Snowy Plover are extremely sensitive to motorized and airborne disturbances in their habitat. The birds will abandon nests if they perceive a threat. This is why vehicles and kites are not permitted on Oregon beaches near nesting sites. For this reason, wildlife scientists recommend that drone take-offs or landing be prohibited within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas. Thank you.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 25, 2022

**Commenter name (if provided):**

Robert Rolen

**Commenter email (if provided):**

rdrolen3@gmail.com

**Public comment:**

As a registered Oregon voter and FAA Part 107 certified sUAS pilot, I would like to add my voice to others who believe that the current language of letting drones fly everywhere except where identified is a reasonable and acceptable compromise to prior proposed rule making. Please do not restrict our ability to fly our drones legally beyond what is reasonably established by the FAA for public safety. Our freedoms are being eroded far to fast, because a very few bad characters make poor decisions.

Thank you,

Robert Rolen  
Hermiston, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 25, 2022

**Commenter name (if provided):**

June Stevens

**Public comment:**

I support the effort to provide clarity in the rules about what is allowed and not allowed for drone users in state parks and along the ocean shore. I have been buzzed by drones on the beach and seen too many instances of reckless drone owners disturbing wildlife on the shore. I think the need to protect wildlife outweighs the needs to get the perfect video as we have more and more people enjoying our public Oregon coastline. Thank you for the opportunity to provide input.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Friday, March 25, 2022

## Commenter name (if provided):

David Rigg

## Commenter email (if provided):

newportcaptured@gmail.com

## Public comment:

Greetings,

I am writing to express my support for the proposed Drone Rules currently under consideration by OPRD.

As a hobbyist/ Cinematographer who resides and operates a drone on the Oregon Coast, I feel that the proposed rules are reasonable and that no further restrictions are justified.

We certainly don't want irresponsible individuals launching drones from inside campgrounds or other heavily congested areas. However, please keep in mind that current Federal regulations would already prohibit such activity. (Because they would be violating several existing regulations, BVLOS, Flying over people, etc.)

I encourage you to work with the FAA and it's Community Based Organizations rather than layering more regulations on top of well designed rules that ALL drone operators agree to follow when they register their drones. Those who choose to violate these rules will have to be dealt with individually. More regulation will not force compliance. Remote ID is coming and that will help with enforcement of the current rules.

As a former USFS Ranger at Cape Perpetua, I can honestly say that encounters with visitors violating the restrictions on Drones flown over the Marine Reserve were RARE.

Also, please keep in mind that you can also work directly with the FAA to "Geo-fence" designated "No-fly" zones such as the restrictions over Cummings Creek. You simply can't launch because the software won't allow it without FAA authorization.

The last thing you want to do is burden your hard working OPRD employees (Particularly Seasonal workers.) with enforcement of additional rules and regulations that they may not understand, nor do you want to spend the money to train them to make judgment calls regarding complex Federal regulations.

The FAA is working very hard to educate, regulate, and provide the tools for enforcement of drone regulations. I caution you to not "Over-react" to a perceived problem. The drone community gets it, some people just hate drones and want to regulate them out of existence. Perhaps their individual

experiences might justify how they feel, but my opinion is that the majority of drone operators are respectful of the regulations, and certainly don't want to endanger the safety of visitors to the Oregon Coast or anywhere else that they may fly.

Thank you for allowing input into this issue.

Respectfully,

David G. Rigg  
Nye Beach, Oregon



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 25, 2022

**Commenter name (if provided):**

Nora Sherwood

**Commenter email (if provided):**

nora@frii.com

**Public comment:**

To Whom It May Concern:

Snowy plovers and other birds that nest on the sand and the rocks along our coastline cannot distinguish drones (or kites, for that matter) from aerial predators. When they perceive something hovering over them, they will leave the nest and hide, leaving the eggs to cool, which reduces nesting success.

More needs to be done to minimize the damage to nesting birds, including close management of drones.

Sincerely,  
Nora Sherwood  
Science Illustration and Wildlife Art  
Lincoln City, OR





# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Friday, March 25, 2022

## Commenter name (if provided):

Pat Chewning

## Commenter email (if provided):

pchewn@comcast.net

## Public comment:

I want to comment on the proposed rules for restriction of drone takeoff/landing in Oregon State Parks and Shorelines. My comment is basically this:

- The rule as proposed allows drone takeoff/landing except where restricted/prohibited by signs or by online maps. This is good.
- The devil is in the details. Where will the signs/maps restrict drone usage? Is a map being proposed?
- I encourage you to develop the closed areas slowly and sparingly. The maps should be mostly Blue (allowed) and few RED (restricted areas)
- The map should not start mostly RED (restricted). Only add a restricted area if it is a known problem zone.

The attached file (PDF) shows what I am commenting on.

Pat Chewning

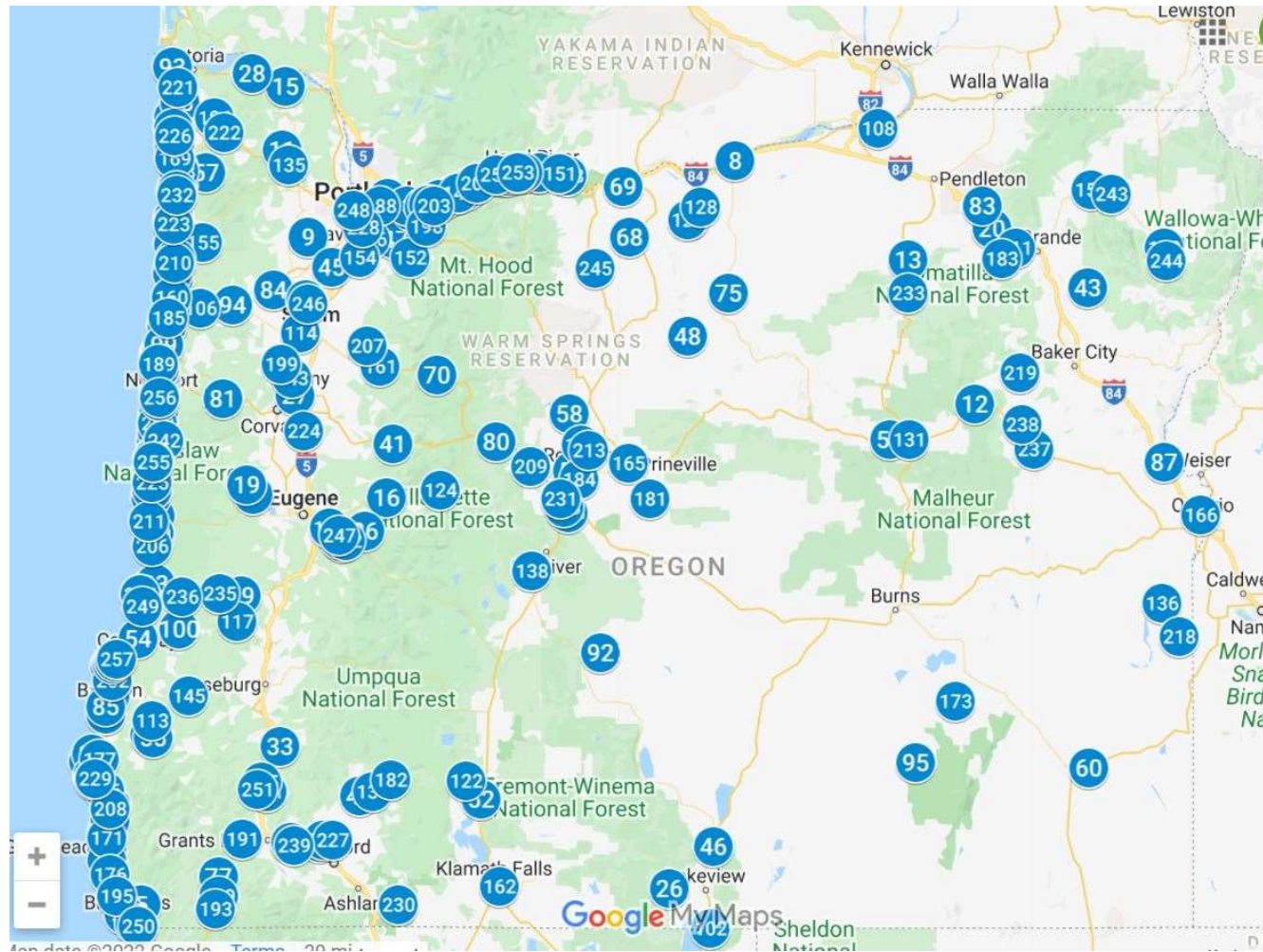
# Drone Rules : Devil is in Details

Drone Rules: Allowed except where prohibited.

What are the details? The maps showing allowed/prohibited areas?

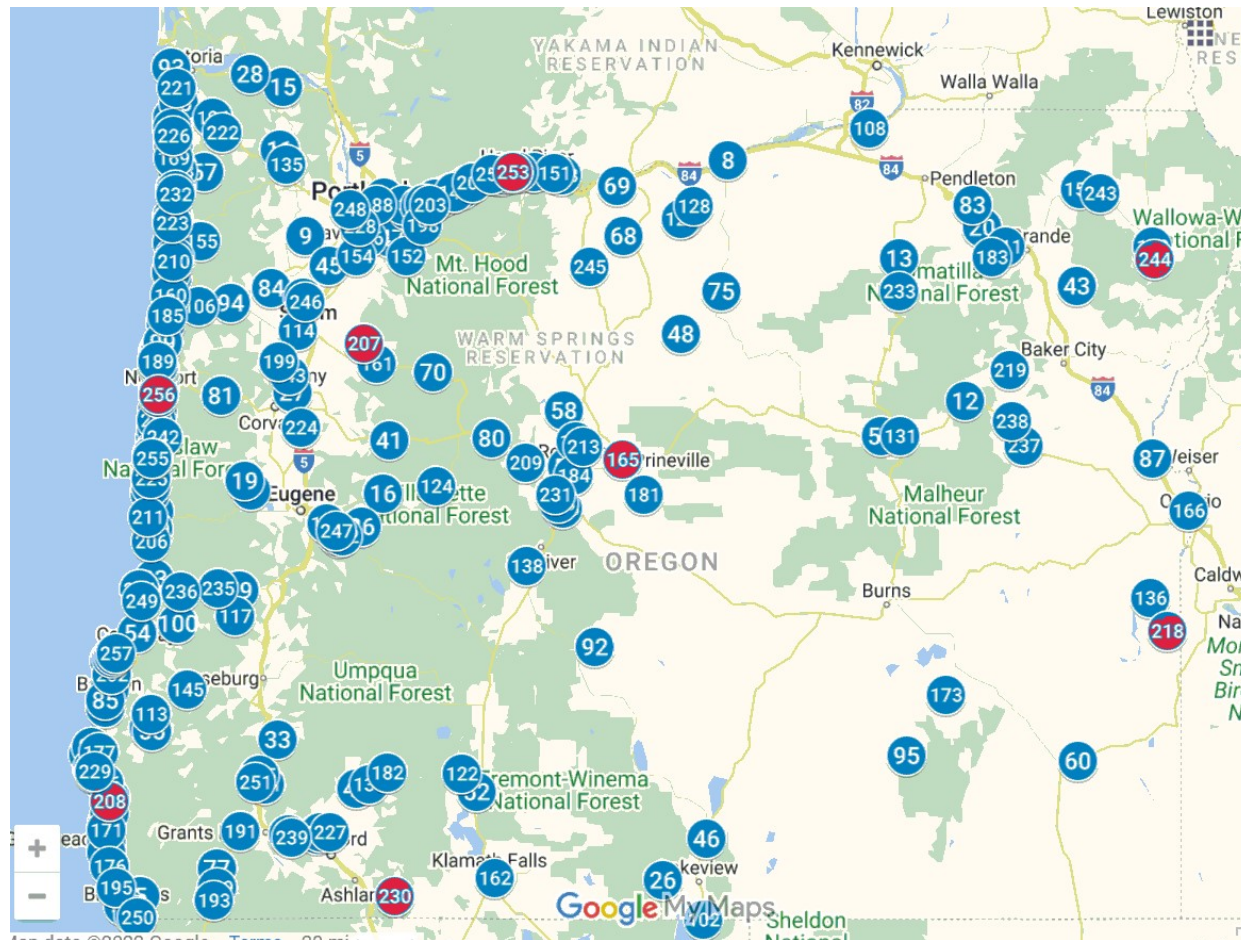
I encourage you to go slowly, only prohibiting in known problem areas.

# Start Here



- A map of state parks, all are “blue” meaning Drone takeoff/landings are allowed.

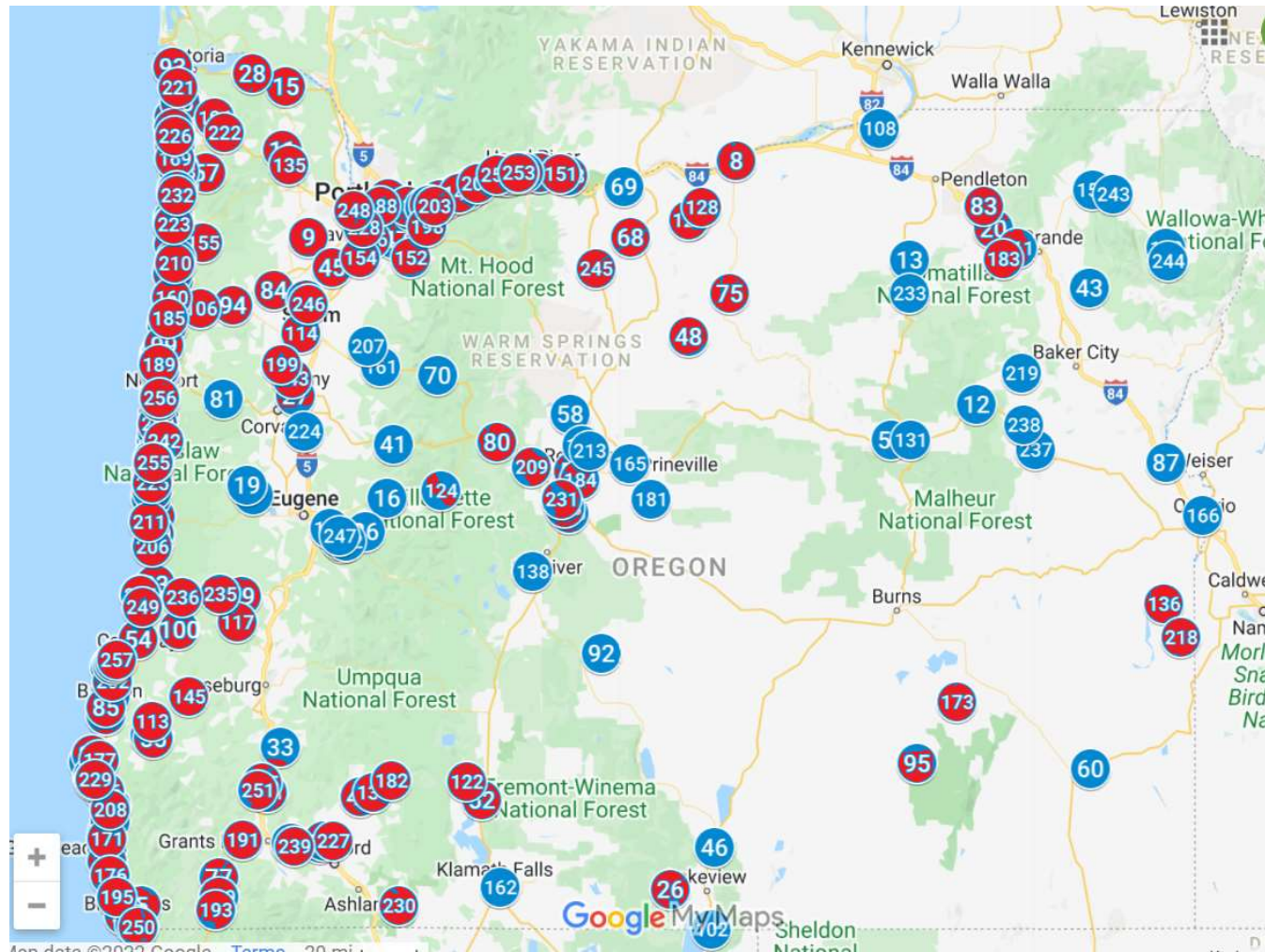
# Slowly add selective closures (Red)



- Selectively add a few closures in known problem areas. (e.g. Bird nests ; Smith Rock)



# Do not start with majority restricted



- Do not blanket the parks with closed areas (Red) with just a few open areas (Blue).



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 25, 2022

**Commenter name (if provided):**

Jean Polequaptewa

**Public comment:**

I appreciate this opportunity to comment on drone use in parks and on beaches. Oregon State Parks and beaches are some of the most beautiful and well cared for in America. Further, Oregon parks and beaches provide a tranquil refuge and offer educational experiences for visitors in a natural setting.

I reside in Bandon, Oregon, and walk the beaches daily. I have had numerous sightings of drones in multiple locations along the coast. On many occasions my attention has been drawn overhead because of the ruckus from upset Black Oystercatchers, a species of concern, because of a drone. This past year at the Face Rock Wayside in Bandon, where drones are prohibited, I asked four people to bring in their drones and fortunately they did oblige. I am sure this is just a small percentage of drone operators since I have friends who have had the same experience as myself.

Drones not only adversely affect wildlife but people as well. They are a visible and audible annoyance, an invasion of privacy, a threat to safety and an emotional trigger for some folks. Personally I feel that they should not be permitted in parks or on beaches whatsoever.

To be equitable to drone operators, I believe there should be a permitting process for particular uses for a set duration where the drone operator may have to pay a fee and understand designated rules in order to be allowed to operate. To facilitate cooperation of drone users there needs to also be the ability to enforce the permits. Parks and beaches will need highly visible signs with the rules simply outlined including fines or consequences for illegal drone use.

Thank you for your time reviewing and considering my comments.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 25, 2022

**Commenter email (if provided):**

dm99531@gmail.com

**Public comment:**

My opinion on drones is that they should only be allowed to land and takeoff in areas that are already open to motorized vehicles and offshore. Further, their elevation should be below that of the flight paths of low flying aircraft such as GG hel...

[Note: Cut off by email subject line character limit. Commenter is welcome to resubmit comment via body of email or via the public comment form here: <https://www.oregon.gov/oprd/PRP/Pages/PRP-rulemaking.aspx> ]



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 25, 2022

**Commenter name (if provided):**

Patricia Heron

**Commenter email (if provided):**

patblueheron@msn.com

**Public comment:**

Thank you State Parks for providing this opportunity and describe any personal experiences or events you have witnessed with drones in parks or on beaches. Please Recommend all state parks and beaches use of drones be prohibited unless otherwise indicated as allowable or designated take-off and landing areas.





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 25, 2022

**Commenter name (if provided):**

Ann Bakkensen

**Commenter email (if provided):**

dearmolly@aol.com

**Public comment:**

I oppose drone use in all Oregon state parks and beaches, unless specifically determined as allowable. Available science should determine where drones are allowed, in order to minimize wildlife, cultural and recreational impacts. I am concerned about drone use and impacts on wildlife, especially nesting birds. Furthermore, I don't want drones flying over me when I'm enjoying Oregon's natural areas.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Thursday, March 24, 2022

## Commenter name (if provided):

Liz Robertson

## Commenter email (if provided):

erobertson.sfca@gmail.com

## Public comment:

Thank you for providing this opportunity for public comment. I studied breeding waterbirds, including Snowy Plovers, in the San Francisco Bay Area for over three years and I highly recommend all state parks and beaches prohibit the use of drones unless otherwise indicated as allowable or designated take-off and landing areas.

State Parks should determine where to allow drones based on the best available science. State Parks should create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts.

While designated areas are being determined, status quo drone use would continue (i.e. this would not ban all drone use at any time during the process).

State Parks should include a final map(s) of designated drone take-off and landing locations on their website.

In areas that are approved for drone use, include in the rules:

- \* No drone take-offs or landing to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas.

- \* Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.

- \* All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time.

- \* State Parks should include strong enforcement mechanisms in final rules.

Thank you,  
Liz Robertson



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Thursday, March 24, 2022

## Commenter name (if provided):

Dean M

## Commenter email (if provided):

deanlm@frontier.com

## Public comment:

Please only restrict drone take off and landing where it places wildlife at risk in state parks. Restricting drones from all state parks except a few is overly restrictive (I pay taxes too and would like to fly drones in the parks).

Note that anywhere designated as a National Wildlife Refuge, National Park, or National Monument is already designated as a "no fly zone" by the FAA. This covers much of the coast including Haystack Rock and the Oregon Islands National Wildlife Refuge plus something like 25 other National Wildlife Refuges and parks in Oregon (it is currently OK to fly in National Forests). If people don't like drones they still have many options to avoid drones by going to national parks instead of state parks.

Wildlife protection laws and public education including signage and website updates should be the focus of the Oregon parks department, not global drone restrictions.

Note that the FAA has some standard "NO DRONE ZONE" signs (search on "FAA No Drone Zone Signs") that can be customized by the parks department to explain what local ordinances like wildlife protection and restricted takeoff and landing offenses would be violated and potential fines and/or jail time. State laws cannot control the air but they can have laws on wildlife protections and takeoff and landing restrictions.

People being annoyed by the sound of a drone is not justification for restricting them in all parks except where specifically allowed. I don't like the sound of kids making a lot of noise but I do not propose banning them from state parks.

From USA Today - "A new study shows that crashes with cars and trucks kill as many as 340 million birds on U.S. roads every year" - How about banning cars in State Parks!

A lot of anti-drone comments come from rock climbers. Seven climbers have died on Smith Rock between 2002 and 2017 (see BendBulletin website) - Why isn't rock climbing banned? Not one death from hobby drones has been documented that I can find. Rock climbers pound in hardware on the surface of Smith Rock damaging and defacing it ("There are several thousand climbs in the park. More than a thousand are bolted routes."). They also are bound to disturb wildlife (only a question of how much compared to drones). As a photographer I would like to be able to photograph Smith Rock without having rock climbers in the image polluting it with unnatural clutter.

Let's ban rock climbing! OK, since that is not going to happen please note that for those climbers that have complained about drones getting too close, that issue is probably already covered by "Reckless Endangerment" laws that would allow local police and/or the FAA to fine or jail reckless drone pilots (up to 1 yr. in jail and up to \$6250 fine). Reckless Endangerment could also be the basis for fines for the noise level when drones get so close to climbers that they cannot hear other climbers. Posting signs for drone pilots that state that getting within 1000 feet of rock climbers is considered to be reckless endangerment which can result in fines and/or jail time might help reduce conflicts. I like the idea of a set event maybe during the last week of August where drone pilots are invited to fly right on the face of Smith rock (dive the rock) and climbers are excluded or warned that the event is approved by the park during that week (posted on climbing websites and the park website ahead of time).

Lots of commenters have mentioned the noise from drones. Nobody has mentioned the noise from small airplanes, helicopters, or jets that are regularly going overhead even though these are usually louder than drones. Why are those people not concerned about that and trying to ban planes? Note that the ocean waves crashing on the beach are far noisier than a drone. My wife kids that they should shut the ocean off at night so she can sleep when at the coast.

There seem to be a bunch of comments about privacy issues with not wanting to be filmed by a drone but no mention of people filming from the ground which is much more invasive! Why are people not concerned with that? State Parks are a public space. There should be no expectation of privacy! Should we ban cell phones because someone might take a picture of you in the park without your permission?

On a more constructive note I think thoroughly posting signs about the penalties (fine and or jail time) for harassing wildlife (including by drone) might be the most effective deterrent to help protect wildlife. Rules such as knowingly getting closer than 400ft of nesting birds or chasing birds should be the basis of any fines, not flying a drone. A regulation requiring that you stop flying a drone when you discover there is a raptor in the area would also be appropriate (there are many YouTube videos of raptors and owls attacking drones which potentially endangers the birds).

Note that the FAA already restricts flying over people and moving vehicles. Besides local laws covering reckless endangerment, the FAA also has a catchall rule about not flying in a reckless manner.

Putting in marked official drone take-off areas might help reduce conflicts so drone operators can point out to someone complaining about people flying drones that the park says it is OK in this area. People that don't like drones can park further down to avoid them. It might also be useful for park officials to try and come up with a list of "Preferred Parks to Fly Drones" to try and direct drone pilots to those locations with minimal conflict for wildlife and other park attendees. If there are undeveloped state park owned lands these might be perfect spots for drones.

The FAA controls the sky down to the ground as to whether or not you can fly a drone. The parks department can control takeoff and landing locations but they can also have restrictions on noise that disturbs wildlife (from drones or any other source) and reckless endangerment for legitimate conflicts with people. Noise restrictions are probably difficult to enforce (what is "too noisy", how was it measured, etc.). Most people would consider a park ranger's statement that something is disturbing wildlife to be justified and not question it or fight it in court.

Drones are a risk to sightseeing planes and helicopters along the coast. Drones are required to fly below 400 feet above ground level. Planes are supposed to fly at higher altitudes after takeoff (greater than 500ft.) except over water where there is no lower limit. Helicopters have no lower limit. Over the ocean there is a high risk of conflict that should be accounted for and brought up with local manned aircraft pilots. Informational postings in the parks should mention this risk for drone pilots from out of the area that might not be aware of this risk (DRONE PILOTS PLEASE

WATCH OUT FOR SIGHTSEEING MANNED AIRCRAFT). That statement alone might stop some casual tourists from deciding to fly in that area. This risk should also be pointed out on the Oregon State Parks website. This is especially important for novice drone pilots. I think it would be very useful for the State Parks website to include a "Recommended Practices for Drone Pilots".



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, March 24, 2022

**Commenter name (if provided):**

Thomas Keffer

**Public comment:**

Thanks for the opportunity to comment.

I have worked as a volunteer for our national parks, leading birding trips for the public. I repeatedly witnessed drone operators overflying shorebirds. Large dark overhead objects are interpreted by the birds as a predator, causing them to take off and vacate the area. The proposed rules would prohibit "harassment, disturbance, pursuit, or injury," but sometimes just a simple overflight will cause them to panic. The rules should prohibit operation near, say 100 meters, of any birds, and especially nesting sites.

For this reason, the rules should be flipped around: operation should not be allowed \*unless\* specifically allowed. Otherwise, the average operator would have no idea if they were in an nesting area.

The proposed rule change is meaningless without seeing the maps. Are we talking about 90% of the parks accessible to drones, with only small exclusion areas around "overnight facilities"? Or, the opposite?

Parks are our last best hope for protecting many kinds of wildlife, particularly birds. The rules must include an scientific advisory group whose job it is to evaluate the impact of drones on wildlife.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Thursday, March 24, 2022

## Commenter name (if provided):

Phyllis T

## Commenter email (if provided):

peatea0@yahoo.com

## Public comment:

TO OPRD Committee:

Guardians of public spaces that include wildlife know that use of recreational drones is a privilege which includes responsibilities. Responsible use of recreational drones includes knowing that they often disrupt essential parts of the complex ecosystem which makes life on earth possible. So why should we allow recreational drones in State Parks and along ocean beaches at all?

### CAN DRONE REGULATIONS BE ENFORCED?

A fine of \$400 (Class A, right?) for misuse of drones sounds significant, but will it be levied? Park rangers and others who must deal with the public are helpful folks, not really law enforcement. Also, they are thin on the ground. People show up with drone toys whenever they feel like it. How many of these people will be caught if they use them improperly and frighten vulnerable wildlife? How many will be ticketed?

Is it better to make things clearer and easier by banning recreational drones in Oregon State Parks and on ocean shores?

My preferred option: BAN RECREATIONAL DRONES IN STATE PARKS, ON OCEAN BEACHES, AND IN WATERWAYS THAT CONNECT WITH THE OCEAN.

Drones are very frightening to birds and small mammals because they are noisy and their shadows look like hawks and eagles. All year around, birds and foxes and rabbits are frightened away from feeding, harried out of protective cover, spooked and stressed by both the sight and sound of drones.

People are irritated and inconvenienced by drones, as well, like those who fish or watch birds, engaging in quieter kinds of recreation.

Recreational drones are a luxury. Why should one recreational group be allowed to disturb so many others, especially when drone activity has a negative effect on wildlife that contributes to a balanced ecosystem for all?

My second choice: AT LEAST BAN RECREATIONAL DRONES NEAR THE OCEAN AND ALONG WATERWAYS DURING NESTING SEASON.

Snowy plovers nesting on beaches, cormorants and murrelets nesting on cliffs, herons and swallows nesting in trees are all stressed and sometimes frightened off their nests by the sight and sound of drones.

I have seen people launch drones over cliffs from car overlooks, right above nesting seabirds. The parent birds screech and sometimes fly away from their eggs. This sort of thing can happen

anywhere, from any dune, over any bay, in any woodland in Oregon public lands.

Unattractive final suggestion: IF FOR SOME REASON YOU CONCLUDE THAT RECREATIONAL DRONES MUST BE ALLOWED, TEACH PEOPLE WHY REGULATIONS ARE NECESSARY.

I'm not sure why careful study would conclude that recreational drone use in State Parks and along the ocean is desirable but, if it comes to that, the drone-public needs to learn why limits are placed on their toys. The following messages need to be very clear:

- Recreational drones are a luxury.
- Use of luxuries in public spaces is a privilege.
- Privileges are earned when they are used responsibly.
- Where drones might frighten or harm wild neighbors, they must be stopped.
- Include vivid drawings, e.g., showing a snowy plover running from its nest when the shadow of a drone crosses it.

Thank you so much for allowing the State-Park-loving public to comment on these proposed regulations. I have friends who enjoy flying drones, but they understand that it is a specialized interest. Drag racing and target shooting are legitimate interests, too, not necessarily appropriate for Oregon State Parks and ocean beaches.

Phyllis Thompson  
Manzanita, OR





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 24, 2022

**Commenter name (if provided):**

Kathi Lamm

**Commenter email (if provided):**

kathilamm@gmail.com

**Public comment:**

Please ban all drones in state parks! Drones disrupt wildlife and the enjoyment of nature in the state parks. I am an avid equestrian and the drones can scare the most seasoned and sensible trail horse. If a horse were to be spooked by drone activity and the horse and/or rider were hurt the state and the drone operator would be liable. Please don't turn our state parks into an amusement park.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 24, 2022

**Commenter name (if provided):**

Cathy Tronquet

**Commenter email (if provided):**

ctronquet@aol.com

**Public comment:**

Please restrict use of drones on South Beach south of Newport OR. We have a population of Snowy Plover that nest here every year. We had two successful nests in 2018 and 2019. At least 12 known and roped nests have failed the past two years. The population of people and dogs has increased here dramatically. Drones are one more threat to the Snowy Plover.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 24, 2022

**Commenter name (if provided):**

Chris Adams

**Commenter email (if provided):**

chris@wisgis.com

**Public comment:**

I just want to go on record that I fully support the proposed rule for "Take-off and landing of drones". As a 107 certified pilot, I consider this a reasonable balance and I thank you for all your efforts.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Thursday, March 24, 2022

## Commenter name (if provided):

Kat Balogh

## Commenter email (if provided):

kathnzz@yahoo.com

## Public comment:

Hello and thank you for accepting my comments for take-off and landing of drones. Last summer I was at Cannon Beach, OR at sunset watching the shorebirds feed when I saw a man set off his drone nearby. The drone flew right over the flock of shorebirds causing them to scatter repeatedly. As an avid birder, I am aware that this disturbance has deleterious effects on the birds feeding and energy input requirements. I asked the man to avoid flying near birds and he refused and told me to show him the law. This was not an isolated incident that I have witnessed on the Oregon coast. Drones disturb many bird species and mammals, not to mention the visitors to the beach.

All state parks and beaches should be closed to drone take-off and landings except where Parks deems safe based on wildlife use. However, this use should be determined by an independent committee to include government agencies, scientists, non-profits and tribal experts.

In areas that are approved for drone use, the following is essential:

1. No drone take-offs or landing to occur within 100m of any observed birds
2. No drone use near nesting locations or from seal haul out and pupping areas.
3. Drone take-off and landings should be prohibited if repeated wildlife disturbance events occur in the same location.
4. Drone use in all areas should be periodically reviewed for wildlife safety.

Please ensure State Parks has strong enforcement mechanisms in the final rules.

Thank you in advance for considering my comments.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Thursday, March 24, 2022

## Commenter name (if provided):

Tania Neubauer

## Commenter email (if provided):

tanianeu@yahoo.com

## Public comment:

Thank you to the State Parks system for this comment site.

On all state parks and beaches, use of drones should be banned unless clearly marked as take-off and landing spots.

State Parks should decide where to allow drones based on the best science.

State Parks should create a working group which includes State Park staff, academic, NGO, and tribal experts) to decide on the best drone take-off and landing spots that do not disrupt wildlife, practice of native culture, and personal use.

While these spots are being chosen, status quo drone use may occur (i.e. this would not ban all drone use at any time during the process).

State Parks should include a final map(s) of drone take-off and landing spots on their website.

In areas that are approved for drone use, include in the rules:

No drone take-offs or landing to occur within 100m of any observed birds and/or known nesting spots or from seal haul out and pupping areas.

Drone take-off and landings should be banned if repeated wildlife disturbance events occur in the same spot.

All chosen spots should often be reviewed to see if they should remain as drone take-off and landing spots based on the best science, as wildlife usage and other factors can change over time. State Parks should include strong means to enforce these usage rules in final rules.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, March 24, 2022

**Commenter name (if provided):**

Betsy Bamford Ayres

**Commenter email (if provided):**

Betsy.Ayres@hotmail.com

**Public comment:**

As a long time resident on the Oregon coast, and I am talking about more than 50 years, I am extremely concerned about the diminishing numbers of seabirds on our shores. Drones have become increasingly popular, and I do understand their appeal to people who wish to have a bird's eye view. My concern is that most people don't understand how detrimental to life and death cycles drones can be. If you were to ask people, they would tell you they love the natural world, and they love the Oregon coast. And many would not understand why drones flying around nesting birds, or birds eating at the shoreline, or birds flying over the ocean, would be a problem. My suggestion, although it would be draconian, would be to forbid all drone activity on the Oregon coast. Our natural world is in such trouble now, and I believe it is our responsibility to do everything we can to protect those without a voice. Thank you very much for your time.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 24, 2022

**Commenter name (if provided):**

Gail Overstreet

**Commenter email (if provided):**

gailodd@gmail.com

**Public comment:**

Thank you for this opportunity to comment on the take-off and landing of drones issue. In my experience on Oregon State Beaches, drones are interfering not only with birds and wildlife and their health and well-being, but causing a disturbance to the quiet enjoyment we human visitors wish to experience in these natural areas.

For the betterment of all, I highly urge Oregon state parks and beaches to ban - or significantly regulate - the use of drones. Drone activities need to be well-considered and regulated, to minimize negative aspects for wildlife and for people.

Finally, regular re-assessment of any allowed drone sites is highly encouraged, and perhaps most important: Enforcement for violating drone laws should be strong and swift.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, March 24, 2022

**Commenter name (if provided):**

Julie Redman

**Commenter email (if provided):**

julredman@gmail.com

**Public comment:**

Over a million seabirds and shorebirds nest along Oregon's coastline every year including the endangered Western Snowy Plover and species of concern like the Tufted Puffin and Black Oystercatcher.

Wildlife disturbances due to improper drone use are increasing on the Oregon coast.

Last year the Oregon Black Oystercatcher Project documented a rate of over 3 drone disturbances per week at active Black Oystercatcher nests. Oregon's iconic coast and state parks are popular visitor destinations. As visitation increases we need to be proactive to minimize wildlife disturbance balanced with appropriate drone use.

All state parks and beaches use of drones be prohibited unless otherwise indicated as allowable or designated take-off and landing areas.

In areas that are approved for drone use, include in the rules:

No drone take-offs or landing to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas.

Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.

All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time.

State Parks should include strong enforcement mechanisms in final rule

This opportunity will also help preserve peaceful experiences for those who want to explore Oregon's natural places and to recreate safely. My husband and I frequently go to the coast to camp, hike and bird. Drones are a hazard, can disrupt wildlife and are a nuisance to enjoying a relaxing, quiet time in nature.





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, March 24, 2022

**Commenter name (if provided):**

Patrick Slabe

**Commenter email (if provided):**

slabe@comcast.net

**Public comment:**

Done used for recreation, educational or scientific purposes, along the Oregon coast, should be highly regulated to protect wildlife species, along with protecting the enjoyment of other users.

There should be designated zones for take-off and landing that do not interfere with wildlife. The States rules, and the periodic review of drone use, should be supported by scientists, tribes and other experts.

Information explaining the use of drones should posted be on the State Parks website as well as appropriate signage at all park locations.

We know people will break the rules, so continuing education, and strict enforcement should be in the rules.

Thank you.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 24, 2022

**Commenter name (if provided):**

Leslie Recio

**Commenter email (if provided):**

leslierecio@live.com

**Public comment:**

Please consider birds and other wildlife. In areas that are approved for drone use, include in the rules:

No drone take-offs or landing to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas.

Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Commenter name (if provided):**

Michael Ashby

**Public comment:**

I support drones in state parks.

**Date comment received:**

Thursday, March 24, 2022

**Commenter email (if provided):**

michaelkashby@gmail.com



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Wednesday, March 23, 2022

**Commenter name (if provided):**

Lindsay Stoddard

**Commenter email (if provided):**

lindsaystoddard@comcast.net

**Public comment:**

Hello,

I currently live in Utah and love to visit the state of Oregon every chance I get. I am a photo and videographer and love the beauty of your state. I take many photos and video flying a drone. I want to keep being able to fly in the Oregon State Parks where there are no current restrictions. I understand that the current proposed rules are under scrutiny and, therefore, the reason for my email.

I am asking that the current proposed rules be left the way they are so as to preserve my ability to fly and capture the beauty of your state.

I am not a resident of your state but feel the need to let you know of my interest in your drone laws since I visit there so often. I consider myself a responsible pilot and try to follow all regulations under the FAA and State of Oregon laws and guidelines.

Please, Please, I am asking to leave the current proposed rules as is.

Thank you,

Lindsay Stoddard



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Tuesday, March 22, 2022

**Commenter name (if provided):**

Doug Brown

**Commenter email (if provided):**

altlknoty@gmail.com

**Public comment:**

Please leave the current rules regarding drones in state parks alone. As a member of the public using state parks and a drone flyer I don't want the rules changed to exclude drone flying.

There are many ways to use the parks and I think the state should be open to all kinds of uses.

You wouldn't let the cross country skiers outlaw the snowshoe users and this follows that same line of reasoning.

Thank you for your attention to this matter.

Doug Brown



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Tuesday, March 22, 2022

**Commenter name (if provided):**

Bill Keenan

**Commenter email (if provided):**

Crashmo22@gmail.com

**Public comment:**

As proposed in both the Park rules as well as FAA regulation, the term drone is misused. It seems to include anything that flies remotely. I belong to a community of radio controlled pilots who fly sailplanes. These are unpowered, mostly silent and graceful models that utilize the offshore wind to sustain flight along the shoreline.

Please adjust your language to more accurately define the term drone to mean "powered" model aircraft, as that seems to be the focus of the proposed rules in the first place.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 21, 2022

**Commenter name (if provided):**

Shane Dugger

**Commenter email (if provided):**

duggerinc@gmail.com

**Public comment:**

thank you for taking the initial steps to allow Uav's to be implemented into the recreational hobbies and interests of your patrons. I would like to suggest keeping an open table to the rule making for takeoff and landing zones. there are several varying factors to include in this rule making. safety zones should be considered first and foremost. thanks for giving me the chance to share my opinion as well!



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 21, 2022

**Commenter name (if provided):**

Shaun Winter

**Commenter email (if provided):**

shaunwinter@gmail.com

**Public comment:**

I see no reason to allow the take off or landing of drones in Oregon parks or public spaces. Drones are a public nuisance that disturb the tranquility of the park environment. Our citizens should not be forced to share space with these annoying toys.





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 21, 2022

**Commenter name (if provided):**

Paul Shampay

**Commenter email (if provided):**

peshampay@gmail.com

**Public comment:**

Just wanted to let you know that I like the currently proposed language of letting drones fly everywhere except in certain identified is a reasonable and acceptable compromise to drone regulations. As an RVer and drone pilot I have thoroughly enjoyed drone flights over the beaches and mountains of Oregon and look forward to more in the future.

Thank you again for your sensible approach to drone regulations.

Paul Shampay  
Part 107 Remote Pilot



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 21, 2022

**Commenter name (if provided):**

Nicole Scheidler

**Commenter email (if provided):**

nscheid88@gmail.com

**Public comment:**

I think it would be beneficial to have widespread communication and understanding on where drones and and can't be. How far away they can be from the owner in public. If I, a citizen, am standing in a drone takeoff and landing zone I want to know.

I would also love "no fly" zones, and to know where they were. Do we know how the noise is affecting local wildlife yet? Who do we call if there's a drone where there isn't supposed to be? Thank you.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Commenter name (if provided):**

Jean Fredrickson

**Public comment:**

Please no drones at all on public lands.

**Date comment received:**

Monday, March 21, 2022

**Commenter email (if provided):**

jeanconnect@aol.com



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, March 21, 2022

**Commenter name (if provided):**

Dulce Havill

**Commenter email (if provided):**

dulcehavill@yahoo.com

**Public comment:**

Drone Harassing Oystercatchers at Face Rock on September 7, 2021

To whom it may concern,

On Tuesday evening September 7, 2021 around 6:30 PM my husband Chuck and I decided to walk the beach at Face Rock. As soon as we got out of our car we could hear oystercatcher alarm calls coming from the beach. As I was going down the stairs I looked with binoculars and scanning the area saw the oystercatchers (BLOY) flying in large circles around one of the larger rocks just south of Cathedral Rock. Next to the rock was a woman dressed to look like a mermaid and a man in costume next to her. We hurried to the beach and, just as we suspected, saw the drone in the sky that the birds were chasing. It was located above and circling the man and woman. There were about 4 groups of people on the beach quite a distance from me. They were far enough away that I could not tell if any of them were the person who was operating the drone. I took photos with the long lens on my camera to look at later and after getting home did find a photo of the operator. (Photo attached).

Suddenly the drone landed and the birds left. Chuck and I continued our walk north on the beach. We returned about 15 minutes later and saw the 2 adult BLOY on one of their feeder rocks just south of the nest rock called Little Cathedral. The two birds were not foraging but standing there with a very alert posture. This is the BLOY pair that I have been monitoring for Audubon this summer. They have successfully fledged 2 chicks but neither chick was in sight at this time.

We then saw the man in costume pick up the mermaid and carry her on his back up to the top of the rock. The drone appeared in the air again with both BLOY in full chase. The drone and BLOY were circling the rock with the 2 costumed people on top. This continued for multiple minutes with the BLOY diving in at the drone making their piercing attack calls the whole time (photos attached). I was hoping the operator would get their photo and stop, but this kept going on and on. I started to get very stressed and walked towards the rock. There was a family near the rock with the costumed people on top. I asked them if they had the drone and they very passionately told me how illegal this drone was. This gave me more confidence to yell up at the costumed people on top that it is illegal to harass birds like this. He didn't seem to hear me but then Chuck yelled out in his loud male voice "Stop the drone! This is illegal!" This got the guy's attention and he got on the phone (with the operator I presume) and yelled back that they were bringing the drone down. Which they did. I now think that the operator was on the other side of the rock from us.

We hung out for awhile and then headed for the stairs looking back occasionally. We then were surprised to see a man walking quickly towards us and waving. Turns out it was the drone operator and he wanted to talk. He was here filming a music video. He told us that he had a drone pilot license from the FAA and that he had permission to film here. He told us that they told him he couldn't film just north of here and he pointed up the beach but he had permission to film in this location. I assumed, at the time, that he was talking about the FAA as giving the permission, but I wish I had asked him specifically. He also told me that the birds were harassing his drone not the drone harassing the birds. Anyway, he wanted to talk, so I told him about the BLOY and some background. He seemed interested in the point I made that if he filmed outside of nesting season it wouldn't be as much of a problem for the birds. He seemed to listen and understand and then we parted. When we got to the parking lot Chuck went to the edge and looked with the binoculars to see if he was going to use the drone again. Chuck said the guy had gone back to rock and was using a camera on the costumed folks. At this point it was beginning to get dark. I wonder how long the drone was bothering the birds before Chuck and I arrived on the beach.

The rules about drones seem vague and up for interpretation. Please come up with drone use regulations that protect birds, particularly during nesting season. It is important to have rules that are clear and easily available to the people who use drones. Also, please make sure that FAA knows the rules so they can share with drone operators who are getting permits.

Photos are attached.

Thanks-you for the opportunity for us to comment,  
Dulce Havill and Chuck Klemer  
Bandon, OR





























# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 21, 2022

**Commenter name (if provided):**

Steve Abrams

**Commenter email (if provided):**

sabramswa@gmail.com

**Public comment:**

To whom it may concern.

I am writing to comment on the new rules for drone in state parks.

I agree there are some area that should be limited especially seasonally.

But the vast majority of state parks do not need these protections and should be open to drone pilots.

It is not unusual for me to pull into a park and be the only one there.

Thank you,  
Steve Abrams



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, March 21, 2022

**Commenter name (if provided):**

John Rash

**Commenter email (if provided):**

jrash@clarknexsen.com

**Public comment:**

To whom it may concern:

I am a registered Part 107 drone pilot and it pains me to see this new regulation limiting the use of UAS anywhere. Within the FAA and Part 107 tests and "laws" there is an understanding that drones shall not disrupt any ecosystem in any way and are currently regulated to a point. I do not believe the regulation proposed, as written is fair to those drone users that follow the laws which most do. For those that do NOT follow the rules, I am all in on increasing fines, or harsher punishments but I do NOT agree that all drone pilots that follow the rules should be punished and I want it to be known that I believe the current regulations of letting drones fly everywhere except those sensitive areas is a fair and reasonable compromise.

Please consider this in your decision for those law abiding drone pilots.

Thank you for your consideration,  
John Rash PE, CDT, LEED Green Associate  
Electrical Engineer  
Raleigh, NC



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, March 21, 2022

**Commenter name (if provided):**

Karen Funk

**Commenter email (if provided):**

services@kernsfunk.net

**Public comment:**

Hi,

I am a frequent visitor to Oregon State Parks, especially on the Oregon Coast. Over the last 30 years, I have visited these parks many times up and down the whole coast. The fresh ocean air, the abundance of birds and other wildlife and the solitude and quiet of these experiences have been critical to me and my family's mental health.

Multiple times, I have been walking down the beach and then a drone buzzes above my head. It's actually very scary because at first you don't know what it is and where it is coming from. Then, you realize that some person in the distance has control of this machine and could really care less about others on the beach and their experience. Not to mention, the disturbance that it causes for nesting birds, sea lions and other animals in this habitat.

Like ATVs, drones should be limited to certain areas, especially the take-off and landing sites. These sites should be chosen so that they have minimal impact on wildlife and people, and posted on the Oregon State Parks website. As more and more hobbyists use their drones on the beach, this is becoming a big problem.

Thanks for taking public comment on drone use and I hope you will make a good decision protecting the beach for us all.

Thanks again,

Karen Funk  
Lake Oswego, OR

**Note: This public comment was accidentally omitted due to human error. We apologize for the mistake.**



## Submit a public comment on a rule

Oregon Parks and Recreation Department

### Proposed rule change:

Take-off and landing of drones

### Date comment received:

Monday, March 21, 2022

### Commenter name (if provided):

James Krier

### Commenter email (if provided):

james.krier@gmail.com

### Public comment:

Dear Oregon State Parks,

Thank you for your commitment to public service and your dedication to make Oregon better every year.

My family hikes pretty often but we do not see drones with much regularity on our trips out. I went to Waikiki beach in January and saw a DJI Mavic thirty feet up as I waded through the crowded beach. Two years ago, there was a small 1 pound drone flying off from the pier in La Jolla 100 yards from where we stood. What may have been strange ten years ago is now part of the fabric in a connected, creative society. What appears as a conflict may be a temporary failure to adapt to modest changes.

As a drone photography enthusiast, I am concerned about your proposed action which would allow your parks to establish 'no fly zones.' For years folks have been using drones in Oregon with relatively few issues. How did we arrive at the point where we need to go against FAA guidance and ban an entire activity across thousands of acres of public land? In terms of accidents, drones are not even in the top ten or twenty, yet we are now compelled to take action? (We won't take it anymore)!? How did we get here? How do we justify the notion that the boater, the camper van, the domestic dog and the rock climber have 'the right' to be there, but apparently, the drone photographer has no rights at all?

Local reactionary rules create an unsafe, fragmented and confusing airspace system which does not respect the rights of photographers. Imagine what it may be like when a State Park shares land with National Forests, i.e., a place where drones are permitted. I guess it's up to the user to know exactly where the invisible line is.

The FAA has released a fact sheet which was critical of local control of airspace:

[https://www.faa.gov/uas/resources/policy\\_library/media/UAS\\_Fact\\_Sheet\\_Final.pdf](https://www.faa.gov/uas/resources/policy_library/media/UAS_Fact_Sheet_Final.pdf) The FAA advises against local no fly zones for any aircraft and also notes local governments cannot add additional registration requirements. Based on these concerns Oregon also created a law that prevents any new rules not passed by the State Legislature (ORS 837.385).

Before making burdensome restrictions with questionable legal backing, please consider the following factors:

1.) Drone footage is protected by the first amendment unlike most outdoor activities. Mainstream and freelance photographers, including the NYTimes, use flying cameras to tell a story. The Ansel Adams of this generation will use drones to do creative and productive things. Idaho State University has even started a degree program in unmanned systems. Please watch a video produced by the National Forest Service:

<https://www.youtube.com/watch?v=HeOI2N6iLy0> Some folks may say drones are intrusive but cameras of all kinds, like on phones, are everywhere in public places. For a story to be adequately told, the fly zone must be far and wide -- it is just not the same as a model airplane hobby.

2.) Did you know that in the entire world, not one person has died in a multirotor drone incident? In contrast there are 500,000 bicyclists that end up in the ER every year. There are 3 million dog bite victims and 600 people who die in recreational boating incidents. There are millions of recreational drones in use, and very little evidence to suggest they are inherently dangerous. DJI has documented over 50 incidents where lives were SAVED in short notice. Most modern camera drones consumers buy weigh about a pound or less (i.e., about the same as a basketball). (What will be Oregon State Parks' policy on tossing basketballs in the air)?

Often, a moving camera removes a human body from risky climbs to take a picture. It's hard to find a safer recreational activity, yet the rule makers do not want to acknowledge the statistics. The next time there is a user conflict with horses will the superintendents ban trail rides in all parks? Drones need to be evaluated fairly and objectively like other activities which all have some risk. With the exception of National Forests, few stakeholders in government have delivered mature level-headed leadership -- it is just too easy to ban any new activity.

3.) It is often claimed that drones are clearly bad for wildlife. In reality, they are being used by researchers because they are less obtrusive than traditional field methods, even hiking. Please check out the following articles published in peer-reviewed science journals.

Title: Using drones to monitor bird nests

<http://www.avianbiology.org/blog/using-drones-monitor-bird-nests> Summary: After the first few trial flights it was clear that this technology poses a huge advantage compared to climbing...

Title: Precision wildlife monitoring using unmanned aerial vehicles

<http://www.nature.com/articles/srep22574> Summary: The authors found that counts using images captured by drones did not startle the birds and were consistently more similar than those taken from the ground

Title: Bears habituate to the repeated exposure of a novel stimulus, unmanned aircraft systems  
Bears habituate to the repeated exposure of a novel stimulus, unmanned aircraft systems | Conservation Physiology | Oxford Academic (oup.com) -

<https://academic.oup.com/conphys/article/7/1/coy067/5248551?login=false> Summary: This research group previously wrote an article showing bear heart beat accelerates when a drone flew over. In this work, they show that the bear acclimates after repeated exposure. (Side note: now many other human activities in parks may cause a bear's pulse to increase)?

Many of us in this community know this is a legitimate and safe recreational activity which allows people around the world to visit your parks virtually when they cannot go physically. It does not deserve to be condemned and criminalized but rather, sensibly reinforced and expanded. Leaders need to create policies that are reasonable -- not reactionary -- as they have for biking, boating and horse riding (to name a few), instead of trying to eliminate an entire activity. How about focusing rules around specific irresponsible behaviors or prohibition in very small high-conflict locations?

2 How about using your voice to emphasize existing FAA rules/registration, best practices, personal responsibility and common sense?



Thank you for taking time to consider this issue. As the process moves forward, Oregon State Parks will be up to the task.

Regards,

James Krier



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, March 21, 2022

**Commenter name (if provided):**

Ingrid Hannan

**Commenter email (if provided):**

ivhannan@gmail.com

**Public comment:**

Greetings,

Thank you, Oregon State Parks, for providing this opportunity to comment about drone use. I deeply value the peace and quiet of being in our wild and natural spaces; and as someone who studied environmental science, I also hold the ecological perspective in mind when I say, I think it is VERY IMPORTANT that all state parks and beaches be closed to drone take-off and landings except where they can be safely allowed. I think drone allowance should be based on the best available science, and therefore, Oregon State Parks should create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts.

While designated areas are being determined, status quo drone use would continue (i.e. this would not ban all drone use at any time during the process, and State Parks should include a final map(s) of designated drone take-off and landing locations on their website.

In areas that are approved for drone use, include in the rules:

No drone take-offs or landing to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas.

Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.

All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time.

State Parks should include strong enforcement mechanisms in final rules.

I am in alignment with the views and perspectives of the Audubon Society, and believe that creating policies that protect and support our bird and wildlife species ABOVE the protection of drone use, to be of utmost importance. Once fragile ecosystems and wildlife are destroyed, they can not be rebuilt or replaced.

Thank you,

Ingrid Hannan

Portland, OR

B.S. Environmental Science, MSW



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, March 21, 2022

**Commenter name (if provided):**

Danny Kern

**Public comment:**

Dear Oregon Parks and Recreation Department,

I live in Coos Bay, Oregon, and I support the latest proposed changes to 736-010-0040 and 736-021-0100 allowing drones to take off from State Parks and state beaches unless specifically prohibited. As a Part 107 UAS pilot I have often consulted the Oregon State Parks websites and posted signage during pre-flight planning to see if I was allowed to take off from those locations, so I welcome the clarified restrictions at specific sensitive sites and near protected wildlife areas.

I believe the professional community around flying drones will continue to help educate the recreational flyers with the same goal of flying responsibly so that everyone can continue to enjoy the State Parks and beaches.

Best Regards,

Danny Kern



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 21, 2022

**Commenter name (if provided):**

John Bellville

**Commenter email (if provided):**

john.bellville@gmail.com

**Public comment:**

To whom it may concern,

I don't think that drone use should be allowed along scenic areas of the Oregon coast, making exception only for a limited amount of time sensitive special use permits issued to responsible parties.

The use of drones significantly depreciates the quality of recreational experience for the user groups that are not operating the drones. Additionally, drone use often proves a nuisance to wildlife and dangerous if inadequately operated.

Best, John

**Note: This public comment was accidentally omitted due to human error. We apologize for the mistake.**



## Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, March 21, 2022

**Commenter name (if provided):**

Gabe Genauer

**Commenter email (if provided):**

gabe@groundswelldevelopment.com

**Public comment:**

Dear State Parks:

I am writing to express support for creating regulations for drone activity in our state parks and public lands.

Please close all state parks and beaches to drone take-off and landings. If you fail initiate an all-out ban, then at a minimum, State Parks should determine where to allow drones based on the best available science; create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts; and include a final map(s) of designated drone take-off and landing locations on their website(s).

If any areas are approved for drone use, include in the final rules that:

- No drone take-offs or landings may occur within 100m of any observed birds and/or known nesting locations; from seal haul out and pupping areas or near any land based wildlife.
- Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.

All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors change over time.

Finally, rules are worthless without enforcement. Please include strong enforcement mechanisms in the final rules and fund the program by issuing fines. Thanks again for considering my comments.

Gabe Genauer



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Monday, March 21, 2022

## Commenter name (if provided):

Steve Garret

## Commenter email (if provided):

smgmkg@gmail.com

## Public comment:

My name is Steve Garrett and I am a board member of Shoreline Education for Awareness (SEA) in Bandon, Or. Our group is present on the local beaches and headlands during spring and summer months, providing interpretation and education to the public. Many of our volunteers have reported harassment from drones being too close to nesting seabirds and I have personally witnessed the wildlife disturbance from drones around Face Rock and Coquille Point. In particular, the Black OysterCatcher is vulnerable because their nesting sites are near heavy traffic areas. Also, Common Murres and cormorants have been seen taking flight from the nest due to close proximity of drones. Coquille Point is also a haul out and pupping area for harbor seals and the plethora of human activity, to include drone use, is very disruptive. All of these animals have a right to be protected from unnecessary human interference which can cause birds to take flight off the nest exposing their eggs/chicks or a mother seal to slip into the water leaving pups exposed to danger.

I support that all state parks be restrictive of personal drone take-off and landings. For clarity to the public, I support state parks having maps of designated drone take off and landing sites on their website. I also believe that approved drone sites should set parameters for take off and landing. If wildlife disturbances are reported in an approved drone area, the approval of drone use should be discontinued. I also support periodic reviews of approved drones areas.

Steve Garret



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 21, 2022

**Commenter name (if provided):**

Douglas Cherry

**Commenter email (if provided):**

kj4cmk@comcast.net

**Public comment:**

As a drone pilot living in New York we are encouraging you to keep the existing rules govern Drones over your state parks. We think they are protecting visitors and animals within the state park. Drone rules in NY and elsewhere are always derived by what is being done in different states.

Thanking you

Douglas Cherry

Geneva, NY



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, March 21, 2022

**Commenter name (if provided):**

Andrew Byrne

**Commenter email (if provided):**

abyrne.pdx.login@gmail.com

**Public comment:**

Hi,  
I'm a 30-year Oregon resident and retiree.  
And a responsible recreational drone flyer for photography and vacation travel purposes. My consumer drone is registered and I have the FAA hobby certification.  
And also I am an OR State Parks passholder.

I agree with the proposal to open up state park areas to recreational drone flying with restrictions to protect wildlife, and maintaining some peace and quiet zones.

Drone cameras provide an unequaled opportunity to capture Oregon's scenic beauty. And that should include as much as the Park system as possible.

For me as a retiree who loves tent camping and hiking and taking driving trips around the Pacific Northwest, drone photography is one of my favorite hobbies.

It seems common sense to me that since other reasonable "noise and intrusion" activities such as boating and running generators and diesel pickup trucks have widespread use in parts, that flying cameras can be fully allowed too, with appropriate restrictions.

Please enact the drone proposal as it is.

Thank you.

Andrew Byrne  
Beaverton, OR





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 21, 2022

**Commenter name (if provided):**

Phil Morales

**Commenter email (if provided):**

phil@le3aerial.com

**Public comment:**

Dear Oregon Parks

I heard through the Pilot Institute of the proposed rule changes for drone flight in state parks, and heartily approve. I have flown in Oregon a number of times, and to be able to fly in the state parks in some areas would be welcome. I would be looking forward to doing so.

Most drone pilots are responsible. If reasonable rules are made, this will encourage people to visit your great state and enjoy its beautiful terrain.

The last several years have shown there is a heightened risk of forest fires. Drones are an under utilized asset to early detect and stop fires. Civilian drone pilots should be educated, coached, and encouraged to report fires they see. They may be the first to see the fires in remote areas. And could help stop them before they grow.

Regards,

Phil Morales  
LE3 Aerial Photography



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, March 21, 2022

**Commenter name (if provided):**

Ken Theimer

**Commenter email (if provided):**

rubik@comcast.net

**Public comment:**

Greetings,

We are your neighbors in Washington State. We are retired and vacation often in Oregon. I fly a camera drone to collect aerial images of interesting places for recreation. I understand that the under your current law, responsible drone flights are allowed in state parks except in a few designated sensitive areas. This seems to be a reasonable compromise and I recommend that the law be retained in its present form. Now, if I could get Washington to follow your lead...

Ken Theimer  
Buckley, WA



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 21, 2022

**Commenter name (if provided):**

Tim Bass

**Commenter email (if provided):**

widelightltd@msn.com

**Public comment:**

I , as a drone pilot ,am all in favor of the proposed rule making effort by Oregon State Parks. As an Oregonian we all have a right to use our public beach's and parks. We all use them in various ways for our own personal enjoyment.

Compromise is good and in this case, hopefully, it will keep everyone happy.

Drone pilots have a slew of rules and regulations we all have to follow as set forth by the FAA.

Responsible drone flyers do understand this and follow the existing laws.

Are the new rules for Oregon State Parks perfect? No , but at the very minimum are a very good compromise.

Much better than a complete ban on flying.

Tim Bass

Bend, Oregon



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Saturday, March 19, 2022

**Commenter name (if provided):**

Bill Posner

**Commenter email (if provided):**

bill@bposner.com

**Public comment:**

As a wildlife and landscape photographer, the intrusion of drones to the natural environment should be restricted or banned. I've seen herds of Elk scattered, Eagles and other Raptors be harrassed as well as nests and other wildlife distrubed. As photographers we try keep our distances, speak in whispers and try not to disturb the natural flow of wildlife. Drones are intrusive, abusive and distruptive and should not be admitted into National Parks.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Saturday, March 19, 2022

**Commenter name (if provided):**

Erik Urdahl

**Commenter email (if provided):**

erik.urdahl@gmail.com

**Public comment:**

I work in photography and video and I don't believe that drones should be allowed in State Parks unless under a commercial permit. The majority of drone pilots ignore rules, follow unsafe protocols, and take little to no consideration for wildlife. Social media encourages people to replicate what they see or take it to the next level which leads to more crashes, more close calls with humans , and threats to wildlife.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Saturday, March 19, 2022

**Commenter name (if provided):**

Tim Laughlin

**Commenter email (if provided):**

tlaughlin@longrobinson.com

**Public comment:**

I am a commercial drone pilot certified by the FAA. Collaboration and full transparency are critical components to developing rules that will impact the public. Thank you for allowing the public to have a voice in the development of this proposed rule.

This proposed rule strikes the right balance between supporting a growing industry and doing so in a way that does not materially impact the environment. Designating non-drone areas, as opposed to implementing a moratorium with few exceptions for take-off and landing, provides flexibility for drone operators to capture the beautiful scenery of the state, and, in other likely circumstances, capture data that can be used to benefit the environment and Oregon State Parks in general.

The importance of the OPRD's proposed rule cannot be overstated. Once a final rule is codified and published--for better or for worse--many state parks and agencies across the U.S. will look to Oregon's rule as an example for what drone take-off and landing rules should look like. This is a reality given that there are relatively few state park rules governing drones. While this legislation will impact Oregon state parks directly, the effects of this final rule will be wide-spread and will influence future rules for state parks located across the U.S. For this reason alone, it is important for Oregon to strike the right balance (which it does here).

While I commend the OPRD for not implementing a moratorium on drone use in public parks, I have noticed that many commentators feel strongly about implementing a moratorium. Motivations for moratoriums are likely fueled by concerns regarding disruption of personal enjoyment and recreation and/or disruption of wildlife. From my experience as an environmental attorney, it is puzzling, and truly astonishing, that this bill has received many more comments suggesting a moratorium on drone use as compared to other bills I have seen which receive little public comment, but have a larger, more direct, and negative impacts on the environment and specific ecosystems across the U.S. This begs the question, why the outcry for drones? Unlike pollution and climate change--which are silent killers of the environment--drones are conspicuous and have little impact on the environment. I suppose it is easy to have a greater reaction and opinion about something that you can hear and see. While moratorium-seekers seem to care more about their experience today (enjoying a park without drones flying around), far less outcry is heard when proposed rules, regulations, and statutes pose substantiated threats to the environment and sensitive ecosystems that many commentators here wish to protect and enjoy.

What many people do not understand is that drones provide great value, both personally, and to

society as a whole. Drones are used by photographers and videographers to capture, among other things, exquisite landscapes. Drones help people tell stories. Drones are also used to collect data and remediate climate change. In fact, unlike traditional data collection efforts that utilize crewed aircraft (airplanes/helicopters), a large majority of drones are powered by electric batteries, which, in turn, means drones have less of an environmental footprint than traditional aircraft. Drones have, and will continue to, reduce society's carbon footprint. According to a study conducted by the Virginia Tech Office of Economic Development, drone delivery in a single metropolitan area could lessen the miles per year in road use by 249 million miles; the equivalent of planting 46,000 acres per year of new forest and reducing carbon emissions by up to 113,900 tons per year. (Virginia Tech Office of Economic Development "Measuring the Effects of Drone Delivery in the United States" p. vi (September 2020)). While folks will likely not be receiving their Amazon packages via drone at state parks across the U.S., this study goes to show that drones will continue to help address, analyze, and remediate the very thing people seem most concerned about with this rule—protecting the environment, its species, and the enjoyment thereof.

In closing, I'd like to thank you for giving the public an opportunity to comment on this proposed rule. To reiterate, this rule, if passed, will set a standard for other state parks to follow. Please consider this as you move forward with your decision. Thank you.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Friday, March 18, 2022

**Commenter name (if provided):**

Paul Howard

**Commenter email (if provided):**

bowsandskateboards@yahoo.com

**Public comment:**

Hi, all I have ever flown by Radio Control, i.e. - "RC" have been nonpowered gliders (or sailplanes). Also, I only fly RC model gliders that I have built myself from mostly balsa with some spruce airframes with a covering over the airframe.

These model gliders are very quiet, they carry no fuel (since there is no motor) and thus are not a fire hazard, and do not carry cameras since they are gliders and by necessity need to be light to fly and catch lift in thermals - like hawks, vultures, eagles, etc..

Again, they are gliders, they cannot hover over anyone for any kind of surveillance. My gliders also are very controllable since they are Radio Controlled so they are not flying randomly since I spend the time and money building them, I want to always land softly and retrieve them.

What I do as a hobby is pretty safe with a good safety record. I'm a member of the Academy of Model Aeronautics (AMA) which also covers me and others with \$2.5Million of insurance as a member (but as long as one is following guidelines - they don't insure "stupid" for good reasons) . I have been doing this hobby for 3 decades now.

I would greatly appreciate having places to fly since there seems to be an over-reaction in laws and ordinances against RC aircraft, including gliders.

The "tradition" of RC aircraft, especially flying smaller, safer aircraft and building them ourselves as hobbyists is over 80 years old. If anything, this activity has only become safer over time due to better batteries, servos, transmitters, and receivers.

Thank- Paul Howard





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 18, 2022

**Commenter name (if provided):**

james O'Dowd

**Commenter email (if provided):**

santa195170@gmail.com

**Public comment:**

I wish to express my support of the proposed rule change for the take-off and landing of drones in Oregon State Parks, as long as those doing so follow the AMA rules and standards



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 18, 2022

**Commenter name (if provided):**

Roxanne Hills

**Commenter email (if provided):**

hroxanne633@gmail.com

**Public comment:**

Allowing drones on Oregon beaches and in Oregon State parks defeats the purpose of setting land aside for nature and human enjoyment of natural areas.

The human population has doubled while animal populations have been reduced by 70%. Less land left undisturbed by humans means fewer species we have on this earth.

Specifically, to the Oregon Coast, the Tufted Puffin's populations in Oregon alone has dropped from a few thousand birds to only a few hundred. At this point every bird counts.

People flying drones, or drones without identification of the people flying them, have been recorded this past summer at Haystack Rock. Even though drones aren't allowed in this bird refuge.

In Oregon Tufted puffins can be seen at their nesting sites April through August-exactly the time drones have disturbed them.

Our beaches and state parks are meant to be enjoyed by humans, not destroyed by humans.

Drones are not natural to our environment. Drones are weapons of war used to discover enemy movements. That is their best use. And that is where they should stay,

We human beings need the opportunity to be in touch with nature in our parks and on our beaches. We need to experience the quiet of forests, the movements of trees in the wind, and use our eyes to see, be in awe of, and respect nature.

We do not deserve to be harassed, or have our animals harassed, by drones.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 18, 2022

**Commenter name (if provided):**

David Geyer

**Commenter email (if provided):**

dhgeyer18@gmail.com

**Public comment:**

Dear Sirs:

Please keep the proposed drone use rule change as is currently structured. Allowing this activity in most areas except where specifically restricted makes a great deal of sense. It's a good and reasonable compromise. Prohibiting drones from flying by default seems to me to be a less desirable model.

Thank you for your consideration.

Your truly,

David H. Geyer



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 18, 2022

**Commenter name (if provided):**

Michael Dodson

**Commenter email (if provided):**

dodsonm@aol.com

**Public comment:**

I wish to be able to fly my small drone (unmanned aircraft system) in our beautiful state parks. I am certified by the United States Federal Aviation Administration under 14 CFR Part 107 as an unmanned aircraft systems pilot. The protection of persons, wildlife, and the tranquility of our parks is uppermost in my mind when I fly my drone. I therefore commend the approach taken by the proposed rules amendments. They provide a good balance of the interests of drone pilots with protection of parks users. As proposed, the visitor conduct rule changes will provide clarity to drone pilots and parks administrators.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Friday, March 18, 2022

**Commenter name (if provided):**

Teri J

**Public comment:**

The biggest concern of mine regarding drones in the parks and along the coast is the privacy issue for humans as well as animals. I do not want to be tracked or stalked. It seems to me that the only way to address that issue is to completely dis-allow the use of drones except maybe for an emergency like finding a lost child for an example. I am also a person who goes to natural areas to find peace and tranquility, which the drones definitely disturb. I hate the fact that you almost always cannot see or find the owner of the drone, in case they are not acting responsibly and respectfully. How can there be accountability for their actions?



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 18, 2022

**Commenter name (if provided):**

Brett Martin

**Commenter email (if provided):**

brettm@winfieldcia.com

**Public comment:**

Dear Sir,

Please don't change the Oregon Drone Rules and Regulations. This could become a template for other state parks nationwide. We don't need this precedent.

Thanks  
Brett Martin





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Friday, March 18, 2022

**Commenter name (if provided):**

Marina Richie

**Commenter email (if provided):**

marinarichie1@gmail.com

**Public comment:**

I am the author of the Oregon Islands National Wildlife Refuge award-winning interpretive signs at some 24 locations mostly in state parks --our team project focused on teaching people to respect the nesting seabirds and not climb on the rocks. And we also educated in some places about drones disturbing birds from their nests--leading to predation of chicks and eggs. Drones also stress the other marine life like seal mothers hauled out to rest with their pups.

I've personally witnessed people launching drones out over nesting islands and have seen the birds react with stress--but those people had no idea they were going anything wrong.

I'm so glad State Parks can now enact regulations that work! I lobbied for passage of this bill in the Oregon legislature and am so glad now you can go to work and make it happen for the good of wildlife--and drone users too who will have clear direction that they lack now.

Please:

Close all state parks and beaches to drone take-off and landings--unless it's clear from the best science that there are some locations that will not cause marine bird and wildlife distress.

Create an independent technical working group--with agency, academic, NGO, and tribal experts--they can determine where drone take off and landing areas are okay and won't disturb wildlife--and ways in all place to cause the least amount of wildlife, cultural, and recreation impacts.

I would suggest that the high priority areas be immediately closed--where it's very clear that drones are flying over key nesting islands--and then use the technical group to act on the rest--but we should not delay where harm is being done--our seabird colonies are already in great distress from warming seas, overfishing, and other causes.

I support rules for areas that are approved for drone use that will assure no drone take-offs or landing occur within 100 m of any observed birds or wildlife; that drone use areas be discontinued if wildlife disturbance occurs there repeatedly or other factors change; and that state parks include strong enforcement.

Finally, as an educator, I think it's important to get the word out for the new rules in positive ways to drone users--website, social media, on site, etc---enlist people's concern for wildlife--to be their best selves. And to direct them to safe places for the activity.

Thank you!  
Marina Richie

Marina Richie, Nature Writer  
Bend, Oregon



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 18, 2022

**Commenter name (if provided):**

Jack Myers

**Commenter email (if provided):**

jack.myers@yesconsultinggroup.com

**Public comment:**

Current Proposed rules for Drone UAS in Oregon

We agree that there are a limited number of areas where drones should not be flown (Around wildlife and sensitive areas) but support the current rules as proposed to allow for takeoff in the majority of areas.

I am an FAA Part 107 trained and licensed pilot, and use drones for building inspections and photography

Please keep Oregons skies open to all Careful and trained UAV Pilots

Jack Myers  
Principle, Yes consulting group



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 18, 2022

**Commenter name (if provided):**

John Nell

**Commenter email (if provided):**

jdnell@charter.net

**Public comment:**

I, as a current FAA certified sUAS (drone) pilot and hobbyist support the current regulatory language of letting drones fly everywhere, except where identified, and believe it is a reasonable and acceptable compromise to current regulations.

I DO NOT support the idea of a comprehensive ban on ALL drone take-offs and landing within your state parks and ocean shorelines.

I, as a visitor and tourist of your great state, fell strongly you should not categorically restrict certain groups of people from enjoying their hobbies or interests within your state.

Respectfully,

John D. Nell



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 18, 2022

**Commenter name (if provided):**

Brian McInnis

**Commenter email (if provided):**

roodog22@icloud.com

**Public comment:**

Hello,

I just wanted to say thank you to the OPRD for thoroughly researching and implementing the rules and guidelines that not only benefit our wildlife and safety but also include the freedom to responsibly participate in flying UAS in our parks. I understand the steps you are taking may have a great influence on the direction that other states may take in implementing their own guidelines and I believe the ordinance and rules you have set forth are the correct ones and take into consideration the welfare and recreational enjoyment of all involved.

I am a small recreational UAS hobbyist. I love the hobby and have my small drone registered and have passed the Recreational UAS Safety Test. I do think it is important to encourage safe and responsible guidelines for the hobby while also allowing as much freedom as possible "everywhere it is safe to do so".

Feel free to contact me if I can help in any way to answer questions or provide any feedback from my perspective. Thank you!

Sincerely,

Brian McInnis



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 18, 2022

**Commenter name (if provided):**

Hung James Wasson

**Commenter email (if provided):**

hjjwasson@hotmail.com

**Public comment:**

Dear Oregon Parks and Recreation Department,

I have read with interest your "Draft OPRD Drone Take-off and landing rules" document (OAR 736-010-0015, 736-010-0040, 736-021-0030, 736-021-0100, and 736-021-0130). As a drone pilot, I applaud your intention of establishing clear rules for drone operators. I fully understand that there are sensitive areas where drone operations would adversely impact wildlife and/or guests to park areas. I applaud the new language as currently written in the Drone Take-off and landing rules document that you have posted on your website.

As a lifelong Oregonian who enjoys the great outdoors in all of its aspects, I fully understand the competing desires of the public that you serve. It has come to my attention that there are groups who are seeking to modify the language of the Drone Take-off and landing rules to ban all drone activity on lands managed by OPRD, except for small areas designated as permissible drone operation areas. I strongly urge you to stick with the current language and NOT adopt such a policy! The lands that OPRD manage are extensive, and there are huge areas where drone operators could fly their drones without adversely impacting wildlife or human guests to the parks. To be constrained to a tiny area that has to be designated and monitored by OPRD is an unnecessary burden both for you and for us drone operators.

I am perfectly content with the language as written, that allows OPRD to establish UAV/drone take-off and landing prohibited areas. Please do NOT reverse the language of the rules to prohibit UAV/drone operation from all OPRD areas not specifically designated as permissible for drone operations. Thank you.

Sincerely,  
Hung James Wasson





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 18, 2022

**Commenter name (if provided):**

Mark Faccone

**Commenter email (if provided):**

m\_faccone@hotmail.com

**Public comment:**

Please keep the rules as is...

Flying drones in or around people or wildlife should be restricted, but there should be more places inside state parks that could be allowed flying.

It should be common sense, but it's flyers that don't have any that make it bad for everyone else.

Drones can be monitored by FAA, so any infraction of these rules could be followed up with FAA. I get that some people want all drone flying banned everywhere. To me, that's like banning driving a car or visiting a state park and walking close to a cliff where wildlife may be habituating.

Keep in mind that everyone should have certain rights and privileges, and if we all follow the rules it's a win win for everyone,



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 18, 2022

**Commenter name (if provided):**

Mark Williams

**Commenter email (if provided):**

williamsfamily18@comcast.net

**Public comment:**

To whom it may concern.

I agree with the current proposed rules for drones in Oregon, to include flying in state parks with restrictions as needed. Thank you for considering my email as this proposal is being considered.

Sincerely,

Mark Williams



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 18, 2022

**Commenter name (if provided):**

William Walton

**Commenter email (if provided):**

walton.william@comcast.net

**Public comment:**

Ladies and gentlemen,

I would like to encourage you to enact this legislation in its current form, providing for the use of drones in all Oregon state parks with limited restrictions. I travel and like to take my drone with me in order to take pictures and enjoy the scenery. State parks provide an opportunity to accomplish that with a low risk of interference to other people or privacy issues. I would not like to see what happened in the state of Pennsylvania. In Pennsylvania's approximately 122 state parks, you can operate a drone in only seven(7) of them and in designated areas only. In one park, you must be a member of the local club to operate your drone. I can tell you that this approach does not sit well with me as a visitor to the state and I can't imagine that it sits well with drone operators who live in the state. Please enact the legislation that allows for the use of drones in all Oregon state parks with limitations where necessary.

Thank you,  
William Walton



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 18, 2022

**Commenter name (if provided):**

Jim Mundy

**Commenter email (if provided):**

jim@jimmundy.com

**Public comment:**

Good Afternoon.

After reviewing the currently proposed (as of 3/18/2022) rules regarding the flying of drones in Oregon State Parks I want to encourage park administrators to proceed as currently proposed.

As a recreational drone pilot I understand that certain areas in state parks must be designated as no-fly zones. I fully support this approach and as I travel through Oregon I would certainly research and abide by these rules.

I believe this approach is more favorable than a no fly in all parks with the exception of certain areas. I believe this approach to be unnecessarily restrictive and would result in recreational drone flyers not being able to capture the beauty of Oregon State Parks.

Thank you for your consideration of my input.

Respectfully,  
Jim Mundy



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 18, 2022

**Commenter name (if provided):**

Mark Chamberlin

**Commenter email (if provided):**

markhc2620@gmail.com

**Public comment:**

To whom it may concern:

I am a relatively new drone pilot and am studying for my Part 107 exam so I can be the safest pilot possible. I am writing in support of proposed regulations in Oregon state parks that allow drone pilot to operate in all but a few select areas. I applaud efforts to protect wildlife and people and the creation of no-fly zones in that regard. I am opposed to initiatives that would limit flying in Oregon state parks to just a few select areas. Such initiatives are unnecessary and would hamper efforts by drones enthusiasts to show the beauty of your state parks.

I appreciate your consideration and urge you to embrace the most open policies concerning drones.

Mark Chamberlin  
Recreational Drone Pilot  
Wichita KS



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 18, 2022

**Commenter name (if provided):**

Randy Passeno

**Commenter email (if provided):**

randy.passeno@gmail.com

**Public comment:**

Hello and greetings from Grand Rapids, Michigan

In short, on behalf of sUAS "drone" operators across the country, I wish to express my desire for your organization to maintain and approve/pass the current adopted proposals as it relates to sUAS "drone" flying within Oregon State Parks.

It is my belief that your passage of the current proposals can have a positive impact on not only the residents of Oregon but across the United States as well.

Respectfully,  
Randy Passeno  
Commercial Pilot/Flight Instructor and Part 107 drone operator.





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Friday, March 18, 2022

**Commenter name (if provided):**

Mary Garrett

**Commenter email (if provided):**

smgmkg@gmail.com

**Public comment:**

My name is Mary Garrett and I am a board member of Shoreline Education for Awareness (SEA) in Bandon, Or. Our group is present on the local beaches and headlands during spring and summer months, providing interpretation and education to the public. Many of our volunteers have reported harassment from drones being too close to nesting sea birds and I have personally witnessed the wildlife disturbance from drones around Face Rock and Coquille Point. In particular, the Black Oyster Catcher is vulnerable because their nesting sites are near heavy traffic areas. Also, Common Murres and cormorants have been seen taking flight from the nest due to close proximity of drones. Coquille Point is also a haul out and pupping area for harbor seals and the plethora of human activity, to include drone use, is very disruptive. All of these animals have a right to be protected from unnecessary human interference which can cause birds to take flight off the nest exposing their eggs/chicks or a mother seal to slip into the water leaving pups exposed to danger.

I support that all state parks be restrictive of personal drone take-off and landings. For clarity to the public, I support state parks having maps of designated drone take off and landing sites on their website. I also believe that approved drone sites should set parameters for take off and landing. If wildlife disturbances are reported in an approved drone area, the approval of drone use should be discontinued. I also support periodic reviews of approved drones areas.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 18, 2022

**Commenter name (if provided):**

Mike Bales

**Commenter email (if provided):**

mikeb368@comcast.net

**Public comment:**

I feel the new rule is a good compromise between UAS operators and the parks and public in general. I would also like to see an easier and cost effective rule(s) put in place for seeking a permit for areas where a permit is required. Specifically, being able to get short notice permission to fly.

I am a part 107 certified pilot and I am dedicated to responsible and courteous operation.

Thanks for the opportunity to comment.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 18, 2022

**Commenter name (if provided):**

Jess Walls

**Commenter email (if provided):**

jesswalls@ymail.com

**Public comment:**

Good for you for allowing drone use! IF they become a problem THEN deal with that PARTICULAR issue.

Some people are easily annoyed and are just plain grumpy. The only way to make those people happy would be to ban all human activity. Sad.

Parks are for the public, allow all members of the public to enjoy our parks. Some activities will conflict with other activities, provide specific times or locations for each.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 18, 2022

**Commenter name (if provided):**

Brent Baldwin

**Commenter email (if provided):**

Brent.Baldwin1960@gmail.com

**Public comment:**

I support this rule change. Having safe places to fly drones throughout the Oregon parks system will help protect the parks and those who use them.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Friday, March 18, 2022

**Commenter name (if provided):**

Robert Elgin

**Public comment:**

As an Oregon resident, I would be in favor of banning drones at state parks AFTER the following are also banned: Dogs, motorcycles, ATVs, boom boxes, a group of loud people including children, loud smelly vehicles like diesel cars/pickups, people walking around taking pictures with their phone, just to name a few. Based on a lot of the comments, they want "peace, privacy, and quiet", right? Interestingly I don't hear any objection about the foregoing disturbances which are exponentially more numerous and obnoxious, and totally disturb the wildlife in the vicinity.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 17, 2022

**Commenter name (if provided):**

Michael Lubrecht

**Commenter email (if provided):**

mlubrecht@frontier.com

**Public comment:**

The proposed rule making is fair and equitable, allowing the responsible operation of UAS while preserving and protecting habitat, wildlife and safeguarding the safety of other park users.





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, March 17, 2022

**Commenter name (if provided):**

Gregory Zorn

**Public comment:**

There are many State Parks and Recreational areas that are or have been used by RC modelers for flying. This new rule would legitimize the use of these properties. I fully support this rule and look forward to the expanded use of our State Parks. Thank you.

Greg Zorn



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 17, 2022

**Commenter name (if provided):**

David Tacal

**Commenter email (if provided):**

hangarace@gmail.com

**Public comment:**

I believe the OPRD should open up areas. Drone flyers have rules they all abide by. Thanks in advance for considering this option for park goers.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 17, 2022

**Commenter name (if provided):**

Donald Esch

**Commenter email (if provided):**

donesch@msn.com

**Public comment:**

Folks,

I have been flying drones for many years. Besides the enjoyment of doing so, I also use them for putting together presentations for others to enjoy our beautiful landscapes, and that many may not be able to do so. Having areas open us to film and share with others makes it a more enjoyable experience.

Thank you.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, March 17, 2022

**Commenter name (if provided):**

Rod Moorehead

**Public comment:**

Thank you for the opportunity to comment on proposed rule change for UAV's in state parks. I think the proposed rule is a step in the right direction. I like the concept of restricting drones only in sensitive areas. While I think it is VERY important to protect wildlife and people's enjoyment of natural experiences, it is not necessary to make blanket restrictions of UAV recreation in state parks.

I would also like to point out that UAVs, commonly referred to as "drones" also includes many other types of remotely controlled aircraft. One type of UAV is unpowered or electric powered gliders or sailplanes which are almost silent and much less threatening to wildlife. There are many area along the Oregon coast where prevailing winds provide opportunities for slope soaring along coastal bluffs.

Thanks again for taking a look at the enjoyment of UAVs in our beautiful state parks.

Rod Moorehead  
Sisters, Oregon



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 17, 2022

**Commenter name (if provided):**

George Bahrman

**Commenter email (if provided):**

george@bahrman.org

**Public comment:**

I believe drones should be able to fly in state parks with exclusion of specific conditions.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 17, 2022

**Commenter name (if provided):**

Ralph Maker

**Commenter email (if provided):**

mrralph60@hotmail.com

**Public comment:**

I think that drones should be generally free to fly with only a few exceptions where harm is demonstrably evident. The opportunities for drone and model aircraft recreational hobbyists to fly have increasingly been declining with often what appears to be outright hostility among some rule makers to the sport. An example of this is Portland, where the rule is "no flying in parks except where expressly designated". The same is true for Metro. I can not find ANY published designated fly zones in Portland or Metro parks. A general exclusion to fly except in designated areas seems to result in no permission to fly more often than not. I would expect no more than a token, inconvenient permission at best.

The RC air hobby craft is a great educational source of outdoor recreation and that is what parks are for.





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 17, 2022

**Commenter name (if provided):**

ROBERT PIPER

**Commenter email (if provided):**

robertgenepiperllc@gmail.com

**Public comment:**

It seems that the Parks and Recreation is being ran by "Grampa who yells at people to get off his grass." As a tax payer I should be able to enjoy the parks and recreation areas. I should be chased out or be threaten with a fine and being ban from ant parks. If it is a plant sanatory. That is understandable. But, if you are boating, playing ball, riding bicycles or just flying a drone in an open area with guidance of safety for the area. Should be the right of everyone. It really is discrimination against a party who fly's Drones. It is also a 1st amendment issue. the right to record in public. I am sure someone will take it to court.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Thursday, March 17, 2022

## Commenter name (if provided):

Raoul B. Salem

## Commenter email (if provided):

raoul\_b\_salem@Charter.NET

## Public comment:

I am a radio-controlled model aircraft flying enthusiast. My wife and I are both members of the Academy of Model Aeronautics, but what follows is my own (AMA 1143532) testimony, and I AM NOT testifying on behalf of my wife (AMA 1143532) or the AMA.

I fly mostly fixed-wing model aircraft. My wife flies mostly helicopter model aircraft, and what are commonly called “drones” (usually having approximately four propellers, each on a nominally-vertical axis of rotation, and which are capable of hovering motionless).

I am of the opinion that ALL of the above radio-controlled model aircraft (regardless of size) should only be flown in areas of Oregon parks and shorelines which are designated exclusively for the flying of radio-controlled model aircraft.

I believe that there is a basic difference between radio-controlled model aircraft flying enthusiasts and other patrons of Oregon parks and seashores as regards what each type seeks from a visit to an Oregon Park or seashore.

Inasmuch as I think that I qualify as “other patrons” (as well as “radio-controlled model aircraft flying enthusiast”), I seek natural scenic beauty, avoidance of the sights and sounds of developed areas and much of modern technology, and low-risk adventure (including hiking, camping, and photographic opportunities).

As a radio-controlled model aircraft flying enthusiast, I seek opportunities to fly my model aircraft in scenic areas (usually not convenient to the locations where I live and work), without interference from the “other patrons” (in particular, when my aircraft is taking off {i.e., becoming airborne} or landing). Flyers of “drones” are able to tolerate some presence of the general public, inasmuch as these kinds of model aircraft are able to hover motionless as they take off and land, and require very little area for these purposes. However, flyers of most fixed-wing model aircraft (which are not vertical take-off and land {VTOL} or short take-off and land {STOL} aircraft) require a significant minimum speed for taking off and landing, and consequently require a significant area of land from which the “other patrons” must be excluded—but beyond which these same “other patrons” may observe safely.

Surprisingly, the reliability of radio-controlled model aircraft technology at the present time is not as good as it ought to be, and seems unlikely to improve in the foreseeable future. If a radio-

controlled model aircraft flying enthusiast is honest, he or she will admit to having heard at least one (but more likely, more than one) story of a radio-controlled model aircraft which suddenly dived into the ground for no apparent reason. There is a number of possible equipment or maintenance faults or pilot errors which can cause this to happen.

I believe that safety comes first, and that (until the reliability of radio-controlled model aircraft technology improves significantly) no radio-controlled model aircraft should be flown over any area where the presence of “other patrons” may be expected.

There are large “drones” which include very high quality cameras. Many of these “drones” are owned by professional and amateur photographers who utilize them to obtain beautiful breath-taking images of the scenic areas of Oregon parks and seashores. I recognize that there is a need for these flyers to have access to these scenic areas. I believe that some risk abatement requirements are appropriate for these flyers and their radio-controlled model aircraft. There are already special licensing requirements for these flyers, but perhaps individual model aircraft type testing and approval may be appropriate.

In my opinion, the risk of serious injury or death to the “other patrons” from radio-controlled model aircraft in Oregon parks and seashores during any increment of time should be commensurate with the risk of serious injury or death to automobile drivers and passengers on public roads during that same increment of time. I do not know where to find the necessary data, nor do I have the statistical computational skills to perform the necessary computations, but I am confident that there are risk management specialists who can do so.

Model aircraft noise may be an issue as regards the usage of Oregon parks and seashores by model aircraft flying enthusiasts. Size is a factor in model aircraft noise. Model aircraft with internal combustion engines are inherently noisy, but most model aircraft internal combustion engines have mufflers to provide noise mitigation. Model aircraft with batteries and electric motors are very popular, and usually much quieter than model aircraft with internal combustion engines. Almost all “drones” have batteries and electric motors. There are a few specialized model aircraft which are designed for high speed, which have very high-speed motors or internal-combustion engines, very high-speed propellers, and which have a higher-than-normal noise level. There are also a few other specialized model aircraft which are designed for very high speed, which have pulse-jet or turbojet engines, and which have an even higher-than-normal noise level, but these are restricted and flown only in specially-designated areas by jet-certified flyers.

I hope that my testimony is helpful, and I thank you very much in advance for your consideration of my views regarding the flying of radio-controlled model aircraft in Oregon parks and seashores.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 17, 2022

**Commenter name (if provided):**

Tom Elliott

**Commenter email (if provided):**

tom\_elliott@msn.com

**Public comment:**

Allowing take-off and landing of drones in State Parks, particularly in isolated areas, creates an excellent benefit for hobbyists. Some of the scenic shots of Thor's well, in particular, are very calendar worthy, and benefit a wide audience. While drones should not be flown near people (see some of the other comments) they do have a place.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 17, 2022

**Commenter name (if provided):**

Robert Ingram

**Commenter email (if provided):**

bob.ingram.bend@gmail.com

**Public comment:**

First: Drones or any type of unmanned flying aircraft (i.e. planes) MUST by FAA regulations have been registered with FAA (number will be provided and put on the drone or flying aircraft) and have passed the TRUST test (as regulated by government). Second: I do not feel that it is safe to fly drones or unmanned flying aircraft (i.e. planes) in areas where there are people. If something goes wrong (and it will by the pilot or the flying object) then someone is likely to get hurt and that could be a defenseless child or a handicap person. I am an AMA member and belong to a club. There are FAA rules and regulations to allow flying as well as guidelines established by AMA. I understand the desire, however I do not want to put the general public at risk AND I feel that by allowing this it puts the general public at risk.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 17, 2022

**Commenter name (if provided):**

Richard Wilson

**Commenter email (if provided):**

PBRRUNNER69@GMAIL.COM

**Public comment:**

I am a member of AMA and follow all the laws and rules when flying drones and RC Planes, We need to be able to fly in open spaces , This is the same as flying kits on the beach and in the parks. What is the difference to that as to flying RC products.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 17, 2022

**Commenter name (if provided):**

Chris Deiss

**Commenter email (if provided):**

cdeiss@teleport.com

**Public comment:**

As an adult (52 yrs old) hobbyist who flies remote-control gliders (non-powered model aircraft), I fully support the proposal to allow drones and model aircraft to operate within Oregon parks and along the coast outside of "Drone Zones". In particular, the coast offers perfect conditions for "ridge lift" flying. Gliders are silent, non-nuisance, and no threat to other park and coast users.

Thanks for you consideration!





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 17, 2022

**Commenter name (if provided):**

Andrew Reischauer

**Commenter email (if provided):**

areischauer1@gmail.com

**Public comment:**

As a ATP rated pilot and part 107 licensed operator, I can appreciate and do respect the current drone operation regulations currently in place. I am not opposed to allowing drone operators from conducting flights in OR State Parks. However, I would suggest the following be implemented. Operators must have in possession either part 107 license if applicable to the operations conducted under that part, and/or for non part 107 operations a current AMA membership card, registered ID number on drone, and FAA TRUST course certificate of completion. Sadly there have been a large number of uneducated amateur drone operators who have caused serious injuries or property damage to others. Preventing this should be the focus



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 17, 2022

**Commenter name (if provided):**

Allen Wright

**Commenter email (if provided):**

allenjwright@hotmail.com

**Public comment:**

March 17: The rules are vague and can be subject to multiple interpretations. There are already rules regarding harassing of wildlife. That subject is not needed in this rule change. If noise is the intent of this rule change, then state that very clearly. Generators, motor vehicles, music systems and other items produce as much or more noise than drones. The rule needs to tie all noise making together. A potential rule change would state that drones may not be flown in parks outside of the hours of 10am to 6pm. Drones with cameras are intrusive. A rule to prohibit photographing park visitors without written permission would be acceptable. Stating that anyone flying a drone is financially responsible for any personal or property damage would be a good addition.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 17, 2022

**Commenter name (if provided):**

Michael Smith

**Commenter email (if provided):**

msmith@orumsolutions.com

**Public comment:**

Freedom to fly drones should be allowed anywhere and not just in designated areas. Many drones are used for photography and provide a unique perspective that even flying in a helicopter cannot provide. Many people base their lively hood on this.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, March 17, 2022

**Commenter name (if provided):**

Boyd Butler

**Commenter email (if provided):**

linbb1@msn.com

**Public comment:**

The last two times at the ocean between Tillamook and the Columbia river stopped several times and at several had drones, NOT model aircraft, flying back and forth in front of us. This is NOT what we want to view and have happen when we are there. By not stopping this before it gets any more out of hand you are going to have someone hurt. Its either going to be a person viewing the ocean and hit with one or the operator hurt by a person upset about it. Have been in RC model aircraft for most of my life. These drones have caused us problems doing things right. Now they are causing the public the same some one is going to shoot one down then its on you people.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Commenter name (if provided):**

Wayne Paulsen

**Public comment:**

Supportive of proposed rule changes.

**Date comment received:**

Thursday, March 17, 2022

**Commenter email (if provided):**

wa2paul@gmail.com



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 17, 2022

**Commenter name (if provided):**

Stein Bulgogi

**Commenter email (if provided):**

steinbulgogi@gmail.com

**Public comment:**

Yes please give us more allowances for drone flying in State Parks.  
Stein from Roseburg



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 17, 2022

**Commenter name (if provided):**

Carol Todd

**Commenter email (if provided):**

jasmineshuman@gmail.com

**Public comment:**

I have enjoyed seeing friends' images taken with drones. My only concern is the coastline with all the nesting places for birds and resting places for other sea creatures. I am concerned that they would be disturbed by drones with people flying too close to them. Carol Todd, Coos Bay





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, March 17, 2022

**Commenter name (if provided):**

Cosmic Lemur

**Commenter email (if provided):**

cosmiclemurdesign@gmail.com

**Public comment:**

Hello, I am a professional graphic designer, editor and drone enthusiast. I recently learned of some potential plans to severely limit drone use in Oregon state parks. As a licensed and well trained drone pilot, I have come to love the world of drones and the many beautiful opportunities they provide. My goal is to bolster the by-the-books, professional drone community as much as possible, and I'm concerned these changes may get in the way.

The FAA's goal with drones has always been integration, not limitation. There are always new ways for great partnerships to be created, and I think everyone needs to follow their example and dig into the details to figure out the most beneficial way to integrate new technology into long-standing institutions. State parks are one of the best places for drone photography, and short of disturbing wildlife, I think the goal should always be integration.

There is always concern with reckless drone use, and that's a concern that I share as someone who cares about piloting safely and according to the requirements of my license. But I'm concerned that hindering the "good" pilots only hurts the relationship, and leads to more and more reckless users.

I hope that in such a beautiful state worthy of endless beautiful photography, a better course of action can be taken toward integration moving forward. I personally have a heart for Oregon and would love nothing more than to be free to shoot its natural beauty when I visit!



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 17, 2022

**Commenter name (if provided):**

Steve Short

**Commenter email (if provided):**

steve@shortfamily.net

**Public comment:**

I fully support your efforts to create a map listing "UAS operation zones" that will allow limited flying zones within Oregon State parks. As everyone should be aware, UAS flights, operated under FAA and TRUST restrictions, are not a risk to people or properties, and with the added zone restrictions that your proposal should cover, wildlife will be protected as well. Opening up the areas will allow photographers, videographers, and recreational pilots to capture the beauty and stunning shots to others that are not as fortunate as others cannot behold.

Kudos Oregon for leading the way to a more progressive stance regarding the growing interest in UAS!!! If you need any help or opinions towards this matter, please allow me to help.

Steve Shor  
Victor, Montana



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, March 17, 2022

**Commenter name (if provided):**

Deborah Buitron

**Commenter email (if provided):**

grebes2@gmail.com

**Public comment:**

Thank you for the chance to comment on the use of drones in State Parks. Oregon is blessed with many fabulous state parks, and we regularly enjoy the ones near us for walking and watching wildlife. A few weeks ago, during a peaceful beach walk, a fast flying drone swooped by just a few feet above our heads. It was a very disturbing experience, and whoever was flying the drone was out of sight. The drone circled around several times before leaving, also disturbing a nearby raptor.

Much worse was our experience with a drone at a California State Beach. Many hundreds of shorebirds were peacefully feeding and loafing in the late afternoon light, to the delight of a handful of observers and photographers watching from a respectful distance. Suddenly the air was full of disturbed birds, and we saw a drone high above them. The flushed birds started to land but the drone circled over again and close to a thousand birds fled the area. This time we did see the couple flying the drone, and asked them if they realized they had just flushed all those birds- they were surprised that a drone would disturb them. They did call back their drone and leave, but the birds were long gone.

These incidents have made clear to us that the use of drones on public land, and especially where there is wildlife, needs to be carefully regulated. Those flying drones need to be clearly told where and when it is okay to fly them, and areas used regularly by wildlife should always be off-limits. State parks should determine where to allow drones that will minimize wildlife, cultural and recreational disturbance. Areas that allow or prohibit drones should be very clearly marked, both on the park website and at the actual locations.

Please consider the use of drones in our parks very carefully.

Thank you,  
Deborah Buitron  
Gary Nuechterlein  
Emily Nuechterlein



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Wednesday, March 16, 2022

**Commenter name (if provided):**

Tim Pfaffel

**Commenter email (if provided):**

nrgtim@hotmail.com

**Public comment:**

I am looking forward to fly my drones in Oregon State Parks with the proposed rules. I am a responsible recreational pilot and I'm studying for my Part 107 certificate. The public should be allow to enjoy the beauty of nature, whether it is be from the ground or safely from the air.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Wednesday, March 16, 2022

## Commenter name (if provided):

Anna Moritz

## Commenter email (if provided):

atmoritz@gmail.com

## Public comment:

To Whom It May Concern:

I am writing with regard to the draft rules regarding drone take-off and landings in state parks and on coastal areas managed by Oregon Parks and Recreation Department (OPRD).

I live in Cannon Beach and I have personally observed frequent drone use locally. Drone use is increasing not only here, but also nationwide and throughout Oregon. Specifically, drone use on beaches and rocky headlands has led to increasing disturbances of nesting seabirds/shorebirds/waterbirds, marine mammals, and other wildlife. Drone usage also can negatively impact the peaceful experiences visitors to State Parks and the Oregon Coast seek when exploring and enjoying Oregon's natural places. Finally, as an equestrian, drones upset our horses and disturb our ability to enjoy wild areas by horseback.

Drone take-off and landing rules should be informed by the best science and take a precautionary approach given that recreational drone use is relatively new and may have impacts that we are not yet aware of.

I appreciate the effort ORPD is putting into drafting these drone rules. I urge you, however, to consider making the following changes to the draft rules:

1. Instead of take-off and landings of UAS/drones on Parks property being allowed unless otherwise restricted, all areas should be closed unless otherwise indicated as allowable or designated take-off and landing areas.
2. An independent technical working group or committee which includes agency, academic, and NGO experts should be established to advise ORPD on developing criteria for allowable/designated drone take-off and landing areas in ORPD administered lands (state parks and ocean shore).
3. The language for OAR 736-021-0100(a) currently states that "Take-off and landing of an unmanned aircraft system must be done in a manner that is reasonable and prudent relative to terrain, prevailing conditions...". This statement is too vague and unenforceable. Instead, specific criteria should be included to address, for instance, how to handle the presence of wildlife; what to do if there is a disturbance, and seasonal closures.
4. In addition to the current prohibition on take-off and landing in rocky habitat management areas, take-off and landings should also be prohibited within 100m buffers of the boundaries from

these sites and other sites specifically designated for conservation purposes, such as marine reserves and marine protected areas.

5. Finally, rules are worthless without enforcement. Please include strong enforcement mechanisms in the final rules and consider partially funding the program by issuing fines.

Thank you again for your efforts and consideration of the suggestions above.

Sincerely,  
Anna Moritz



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Wednesday, March 16, 2022

**Commenter name (if provided):**

Nancy Thomas

**Commenter email (if provided):**

shipwreck5000@gmail.com

**Public comment:**

I do many bird surveys for coast watch and Audubon. I have experienced first hand how drones interfere with nesting Black Oystercatchers at Seal Rock. The birds see the drones as a predator. They waste energy chasing drones while real predators like eagles attack their nests and eggs. Drones should be banned from rocky shores where birds nest for the entire nesting seasons. Also some Drone owners Ignore signs to stay off the rocks. Thank you for taking my input.





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Wednesday, March 16, 2022

**Commenter name (if provided):**

Sharon Moy

**Commenter email (if provided):**

moy\_seaglass@msn.com

**Public comment:**

Comments re establishing rules/laws re drones, including take-off locations and landings:

I do believe there must be places and areas where the use of drones and drone photography should be allowed. This is a worthwhile sport and involves much creativity, logistics and skill. It's a wonderful sport for young people, in particular.

Cannot there be areas, however, that are off-limits, without too much compromise to the drone enthusiasts? We allow hot air balloons, model airplanes, small aircraft at low altitudes, water craft, surf boarding, and so forth. Keep in mind a kind and workable compromise.

Mrs. S. Moy  
Bandon, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Wednesday, March 16, 2022

**Commenter name (if provided):**

Desi Ekstein

**Commenter email (if provided):**

DroneDivaDesi@gmail.com

**Public comment:**

Thank you for considering the use of drones take-off and landing in the Oregon State Parks.

I use drones for commercial and recreational purposes. I am an educator in the drone industry workforce development and STEM. I have seen many lives and careers change due to the introduction of recreational drones.

Drones are an excellent pathway for youth and people with disabilities to find enjoyment and possible career opportunities. They provide creativity, ingenuity, and skill.

As a recreational flyer myself, I quite often enjoy flying my drone and getting the higher perspective that a drone offers. This is a perspective that can only be seen from the air. Some of the drone footage I am able to share with friends and family. They may never have an opportunity to see or experience the location or perspective.

I appreciate your approach to the drone regulations proposed. I agree they should not be permitted to fly in sensitive areas that would disturb wildlife. This should not prohibit drones from all areas. I believe the drone industry has come a long way in respect to public awareness. Yes, there are people that do not like them or want them around, but drones are a valuable part of our future. As younger generations come to visit your parks, drones will be recognized by their value and not as a threat.

Some concerns that people have is the safety and noise. There are drones that can be large and noisy, and some drones are small and annoying with buzzing. A large number of recreational flyers utilize much smaller drones (under .55 pounds) and are very quiet. They are compact with excellent telemetry and perfect for capturing aerial imaging. Technology has evolved and continues to evolve, and this has already proved improvements. The drones are smaller, lighter and some offer sound reduction propellers.

Oregon State Parks have beautiful locations to film and fly. Drones provide a higher perspective to capture the unique beauty that can not always be seen from the ground. Allowing the use of drones will provide safe recreational enjoyment and allow for a person's creativity expand.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Wednesday, March 16, 2022

**Commenter name (if provided):**

Mike McPhearson

**Public comment:**

The rules that are already in place are plenty good enough.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Wednesday, March 16, 2022

**Commenter name (if provided):**

Jeff Folger

**Commenter email (if provided):**

jeff.foliage@gmail.com

**Public comment:**

as a part 107 pilot, I'm a photographer first and foremost and when in or over public lands I know most drone operators try to be aware of their surroundings and fly safe.

Trying to tell us that we can only enjoy from a small corner and not to stray from there means we are marginalized and you don't want us there.

Many people are worried about drones spying on them, we could care less about people down below and I try to stay away from people for this reason. My drone is not very noticeable because I'm usually at 200 feet or higher and at this point there is little noise to hear or bother a person on the ground. I've yet to hear a good argument for keeping me from flying. Assuming I'm flying within regulations.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Wednesday, March 16, 2022

**Commenter name (if provided):**

Mark Muller

**Commenter email (if provided):**

markandca@sbcglobal.net

**Public comment:**

I am an avid landscape and bird photographer. I am opposed to allowing takeoff and landing in state parks and along the shore. For one, drones are noisy and disturb the otherwise natural sounds of the parks and ocean areas. Secondly, drones can too easily scare or frighten or just disturb birds, especially during nesting and the raising of young birds. Please keep Oregon's parks and beaches quiet as nature would have them be.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Wednesday, March 16, 2022

**Commenter name (if provided):**

Amy Carleton

**Commenter email (if provided):**

amykcarleton@gmail.com

**Public comment:**

Dear State Parks:

Thank you for providing me the opportunity to comment on the proposed Drone Take-Off and Landing Rules. I live in Cannon Beach and often see drones being flown by people without any regard for wildlife around Haystack Rock and all along the beach and parks. I often walk with my kids to Crescent Beach on the north end of Cannon and have observed an Eagle's nest with baby birds. It is a truly special area with no visible signs of human contact and very few people are generally down there. The presence of a drone there would ruin the pristine nature and bother the animals and people that enjoy it respectfully.

Please close all state parks and beaches to drone take-off and landings. If you fail initiate an all-out ban, then at a minimum, State Parks should determine where to allow drones based on the best available science; create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts; and include a final map(s) of designated drone take-off and landing locations on their website(s).

If any areas are approved for drone use, include in the final rules that:

- No drone take-offs or landings may occur within 100m of any observed birds and/or known nesting locations; from seal haul out and pupping areas or near any land based wildlife.
- Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.

All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors change over time.

Finally, rules are worthless without enforcement. Please include strong enforcement mechanisms in the final rules and fund the program by issuing fines.

Thanks again for considering my comments!

Amy



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Wednesday, March 16, 2022

**Commenter name (if provided):**

David Gerlach

**Commenter email (if provided):**

shepherd.warrior.king@gmail.com

**Public comment:**

Dear Oregon Parks,

As an Oregon resident and drone pilot, I ask you to refrain from limiting drone flights to just a few specific spots in our state parks. That kind of thinking would result in more drone collisions and people just choosing to fly anyway. Neither option is acceptable to law-abiding UAS pilots.

Rather, allow licensed drone pilots to enjoy our beautiful open spaces, and in the case of protecting wildlife or privacy, keep the restrictions as area-specific as possible. Most licensed drone pilots want to fly safely and legally.

Thank you for not allowing a few activists to keep the citizens of this state from enjoying its natural beauty.

Sincerely,

David S. Gerlach

Registered voter and citizen of Oregon





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Wednesday, March 16, 2022

**Commenter name (if provided):**

Aaron Matusick

**Commenter email (if provided):**

amatusick@affinityproperty.com

**Public comment:**

Dear State Parks:

Thank you for providing me the opportunity to comment on the proposed Drone Take-Off and Landing Rules. I live very close to Ecola State Park and often see drones being flown by people without any regard for wildlife. The disturbances to birds is seemingly well documented, but I want to point out the resident elk herd in Cannon Beach that I've personally seen disturbed by drones being flown next to their heads.

Please close all state parks and beaches to drone take-off and landings. If you fail initiate an all-out ban, then at a minimum, State Parks should determine where to allow drones based on the best available science; create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts; and include a final map(s) of designated drone take-off and landing locations on their website(s).

If any areas are approved for drone use, include in the final rules that:

- No drone take-offs or landings may occur within 100m of any observed birds and/or known nesting locations; from seal haul out and pupping areas or near any land based wildlife.
- Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.

All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors change over time.

Finally, rules are worthless without enforcement. Please include strong enforcement mechanisms in the final rules and fund the program by issuing fines. Thanks again for considering my comments.

Aaron Matusick, General Counsel  
Affinity Property Management, LLC  
Portland, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Wednesday, March 16, 2022

**Commenter name (if provided):**

Sean Dolan

**Commenter email (if provided):**

seandolanster@gmail.com

**Public comment:**

Full support of this rule. My hope is that other states will follow suit and implement similar rules. Currently, Wis. has a no drone flying in the state parks law and would love to see a similar bill passed here.

Thanks

Sean Dolan



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Tuesday, March 15, 2022

**Commenter name (if provided):**

Greg m

**Public comment:**

Please write rules for the use of drones that default to maintaining the prevailing low-impact and public-wide benefits of our state parks. This means writing rules and maps that limit drone use to indicated areas only vs. allowing their use in all areas, until later restricted.

It is obvious that the noise that drones create is distributed over a much larger area than the noise made by most other recreation/leisure activities that occur in the parks. This means that those guests recreating using drones are affecting more people and wildlife than the same number of fishermen, hikers, bird watchers, disc golfers, family reunions, etc. Because a drone users impact and speeds are larger, their allowable footprint needs to be smaller. Otherwise these park users 'crowd out' many other incompatible activities i.e those that benefit from quiet.

The frequency that drones emit is more disturbing than other noise at the same decibel level, do not discount this effect on other users either. Plenty of noise ordinances across the country account for these "nuisance" frequencies and "steady sounds" with more limited areas and hours of operation for such machines, for example air compressors and leaf blowers.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Tuesday, March 15, 2022

**Commenter name (if provided):**

Carrie Phillips

**Public comment:**

Recreational use of drones should be limited to areas where cultural, ecological, scenic, and natural (sound scapes, solitude) values have already been significantly impaired or destroyed, like parking lots and areas of active OHV use. Further, take-off should be restricted to locations farther than one drone flight from any area where such values are still extant to ensure irresponsible or unskilled drone pilots can't wreak ecological destruction like this:

<https://www.washingtonpost.com/science/2021/06/07/drone-crash-abandoned-eggs/> Non-recreational drone use in areas with any remaining cultural, ecological, scenic, or natural values should only be allowed in a true emergency, or when park resource experts have determined that the information to be gained has a net benefit to those values.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Tuesday, March 15, 2022

**Commenter name (if provided):**

Michael Manzulli

**Commenter email (if provided):**

manzulli@gmail.com

**Public comment:**

Dear OPRD:

I am fortunate to live sandwiched between Oswald West, Hug Point and the ocean shore. I spend alot of time on OPRD regulated land. I have personally been buzzed by drones, watched drones buzz children and more than I count, watched drones flush birds off nearshore rocks and harass resting marine mammals.

I urge you to greatly limit drone use in state parks, especially on Oregon's beaches and beachside parks. The current rules are not strict enough to protect sensitive wildlife and positive recreational experiences.

The drone users I've witnessed do not understand that "As provided in OAR 736-010-0055, park visitors may not harass, disturb, pursue, or injure wildlife" applies to their drone. OPRD needs more specific prohibitions which openly ban drones from operating on our beaches. It is easier to enforce simple no drones allowed areas than more complex rules. The bottom line is the only person or wild animal that likes a drone flying overhead is the person operating the drone.

Thank you.

Michael Manzulli  
Arch Cape, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Tuesday, March 15, 2022

**Commenter name (if provided):**

Jeanne C

**Commenter email (if provided):**

nani.aina@gmail.com

**Public comment:**

I support the effort of OPRD and the state legislature to develop rules regarding the take-off and landing of drones at State Parks.

Drone use is annoying to me when I visit parks, but more importantly, it can have devastating consequences to wildlife, particularly during nesting season. Sensitive species like black oyster catchers are particularly vulnerable. Their numbers along the Oregon coast are already low, and they are currently experiencing low reproductive success. Drone flights near their nest sites will only make that worse. We need to protect them - and other wildlife - from harm.

Currently drone use is prohibited in National Parks. I support their prohibition in Oregon State Parks as well. Having one rule makes it very easy to get the message out that drone use is not allowed, period. But at the very least, please prohibit the take-off and landing of drones in our state parks and other state lands of concern during nesting season.

Jeanne C



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Tuesday, March 15, 2022

**Commenter name (if provided):**

Nadia Gardner

**Commenter email (if provided):**

nadiaegardner@gmail.com

**Public comment:**

Dear OPRD:

As a north Oregon Coast resident, I urge you to greatly limit drone use in state parks, especially on Oregon's beaches and beachside parks. The current rules are not strict enough to protect sensitive wildlife and positive recreational experiences.

Limitations should be determined by sound science and diverse stakeholder input. I ask that you create an independent technical working group (including agency, university scientists, non-profit conservation, and tribal experts) to determine appropriate drone allowed areas that minimize wildlife, cultural and recreational impacts.

Nesting and foraging migratory seabirds, shorebirds, and raptors are greatly impacted by drones in these areas. Many of these species are in decline. Drones are also noisy and invasive, reducing positive recreation experiences. This hurts our tourism economy, so important to our local communities.

It is easier to enforce simple no drones allowed areas than more complex rules. So, since Parks has limited capacity, please err towards more conservative rules. But at minimum, drones should be not allowed within 100 meters of bird nesting areas and seal haul out and pupping areas.

This is too broad to be understood by drone users:

1. As provided in OAR 736-010-0055, park visitors may not harass, disturb, pursue, or injure wildlife.

OPRD needs more specific prohibitions with great and widely available maps and app data.

In addition to rocky habitat conservation areas (eg marine gardens), drones should also be prohibited along Oregon marine reserve sites.

Thank you.

Nadia Gardner  
Arch Cape, OR





# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Tuesday, March 15, 2022

## Commenter name (if provided):

Ethan Hibler

## Commenter email (if provided):

ethan.hibler@lanecountyor.gov

## Public comment:

"Dear OSPD leadership team, As proposed, I feel the regulation is smart and protectively efficient. I realize that there are some groups in Oregon that desire tighter constraints on where drone pilots may take-off and land, particularly along the beautiful Oregon coast. As an Oregon-based travel and documentary producer and FAA Part 107 Certified sUAS Remote Drone Pilot, our glorious seashores have become one of my most favorite aerial and ground film locations. As a devout Oregonian and humble outdoorsman, I take great care in doing my part to help keep Oregon beautiful by remaining proactive about protecting our unique wildlife and the abundance that flows from our many invaluable natural resources. This means that I plan each flight according to certain risk mitigation factors; one being that of how a proposed aerial mission will interact with the surrounding environment. Risk assessments are performed to determine if the flight could be hazardous to people, wildlife, the environment, and property. Based on my experience with and observation of other Oregon drone pilots, we all cherish the natural beauty that is Oregon and remain dedicated to appreciating and caring for her for many future generations to come. At this, I respectfully ask that you proceed as written with the "Proposed Park Area Rules - DRAFT OPRD Drone Take-off and landing rules." I adamantly agree that the current language of letting drones fly everywhere except where identified is a reasonable and acceptable compromise."

I also live and Work in Oregon and these words hold true to how I feel as a hobby drone pilot and commercial drone pilot who flies in and near parks for multiple reason, and your regulations would hinder my experiences flying in Parks.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Tuesday, March 15, 2022

**Commenter name (if provided):**

Elizabeth Fox

**Commenter email (if provided):**

keokuk1956@gmail.com

**Public comment:**

Please consider seasonally banning the use of drones around sensitive natural resource areas including colonies of seabirds during the nesting season, if not permanently. Quite often, the public doesn't understand that taking photos at close range with a drone is actually wildlife harassment. Having clearly established rules regarding drone deployment will help prevent this.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Tuesday, March 15, 2022

**Commenter name (if provided):**

Robin Murphy

**Commenter email (if provided):**

robin.r.murphy@gmail.com

**Public comment:**

This is certainly a difficult topic- many of the smaller drones can be launched (and caught) from a person's hand. They don't necessarily need the big area that a cinematographer rig does. Limiting areas seems unrealistic and even can interfere with line of sight.

To me the issue isn't specific areas but rather ensuring the pilot is being safe- launching and landing away from people, being prepared to handle any problems, etc.

Taking off and landing from the peak of a ridge with no one around is probably more safe than from a parking lot with people standing around in the way, gawking and distracting the pilot.

Another aspect is to consider that altitude, above the tree line is usually too high for anyone to hear or notice, so it won't interfere with everyone's enjoyment. And drone owners' enjoyment too.

Thank you for your consideration.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Tuesday, March 15, 2022

## Commenter name (if provided):

Goly Ostovar

## Commenter email (if provided):

golyostovar@jeffnet.org

## Public comment:

From: Goly Ostovar's comment regarding drones,

I think a complete ban is necessary for all drones take off, Landing, and flying around in all Oregon State Parks and all along the coast and beaches. Several reasons for this, safety, hazard to aircraft, noise pollution, security risk to privacy and damage to the wildlife and degradation of the environment.

There is already a lot of pressure on our public lands and they are some of the few places available for people who seek a bit of respite and some level of peace and quiet to be close to nature. Drones are noisy and invasive and they frighten and harass wildlife, and people. They are dangerous to aircraft and rescue helicopters. They interfere with firefighters work, who have had to ground their helicopters during fire season.

I understand that some people who fly them for pleasure feel like they have a right to be in public lands. But regulations are necessary to maintain safety and privacy and protecting the environment and not be a nuisance to others.

People with drones need a space like all other people with their toys, and pets. Something like a park set aside for drone flying with limited geographical area and elevation. Just like we have dog parks, skate parks, and area for dune buggies, there can be an area set aside for drone flying. They should not expect to fly their annoying toy hovering over people in public beaches or in state parks. There must be strict regulations and enforcement of rules.

I think drones should be banned from all beaches, state parks, and all wilderness areas, at Smith rocks, and many other areas. Drones should not harass nesting eagles and other raptors. And drones should not be allowed to fly over the bird sanctuary islands in the ocean particularly during nesting season.

We have regulations for roosters, chickens, loud music...etc. The same should apply to drones. They have become a danger and a nuisance to wildlife, aircrafts, environment, people's privacy and security.

Please ban them. Thank you



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Tuesday, March 15, 2022

**Commenter name (if provided):**

Ann Levine

**Commenter email (if provided):**

alevine51@gmail.com

**Public comment:**

The Oregon coast is a natural wonder that provides respite to our harried souls. This is where we go to get away from the hustle and bustle of modern life. The whining noise of drones would shatter the peace, and destroy the quality of the the experience for everyone. No drones in State Parks!



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

Deb Whitcomb

**Commenter email (if provided):**

1debwhit@gmail.com

**Public comment:**

Thank you for the opportunity for public comment on proposed restrictions of recreational drone use in Oregon State Parks.

Please see the attached email for my public comment.

**From:** [Deb Whitcomb](#)  
**To:** [PUBLICCOMMENT \\* OPRD](#)  
**Subject:** Comment on drone use in state parks  
**Date:** Wednesday, March 16, 2022 12:39:04 PM

---

Hi,

I submitted a comment online a couple of days ago, but the comment didn't seem to keep the photo and graph that were part of it, so I figured I'd send it again this way.

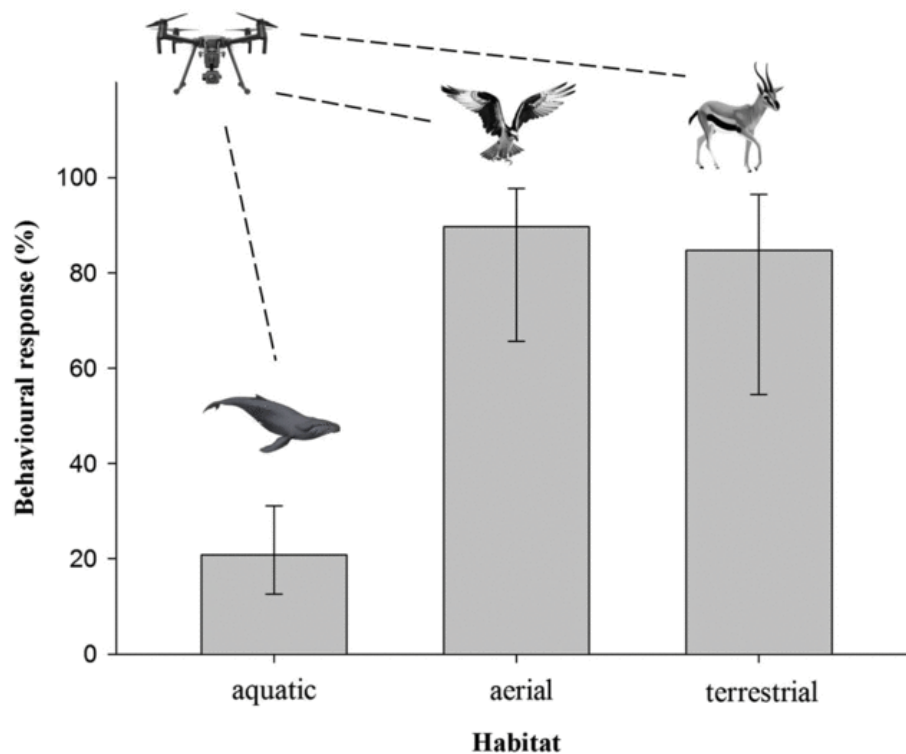
Thank you for the opportunity for public comment on proposed restrictions of recreational drone use in Oregon State Parks.

For the sake of wildlife, I believe that all recreational drone usage should be prohibited in State Parks. In addition to prohibiting launchings and landings, that would include prohibiting drones from entering the air space of the State Park.

People flying their drones in an area with wildlife are typically advised to remove their drone from the area if they see behavioral changes in the wildlife. Unfortunately all drone operators are not necessarily sensitive to this, or in a worst case scenario are actually getting a thrill out of engaging wildlife with their drone.

A study of YouTube videos reveals high behavioral response from birds and land animals when confronted with a drone.

[Drones as a Threat to Wildlife: YouTube Complements Science in Providing Evidence about Their Effect](#) (Cambridge University Press)





## Drones a Source of Disturbance for Wintering Water Birds

(British Trust for Ornithology)

In addition, sometimes stress is experienced by wildlife as physiological changes that aren't accompanied by obvious behavioral signs – see

<https://www.sciencedirect.com/science/article/pii/S0960982215008271>

The destructive possibilities of a single drone flight can be devastating for wildlife. In May 2021, 1500 tern nests were abandoned in Boca Chica Ecological Reserve in California because of a drone.



[A generation of seabirds was wiped out by a drone in O.C.](#)

I would encourage Oregon to follow the lead of the U.S. government and states like Washington and Colorado, which prohibit drones in their Parks.

(If air space is controlled by the FAA, then I would encourage Oregon to work with other states that restrict such drone usage to get the FAA to add these natural areas to their overflight restrictions. Drones are already prohibited in National Parks, so this should be legally doable.)

The protection of wildlife and wild habitats are a primary reason for the existence of State Parks. The already stressed State Parks should not be further burdened by the introduction of a motorized, intrusive and ineffectually regulated recreational activity (that cannot be effectively regulated in natural areas).

Default setting should be no drone activity allowed. At an absolute minimum, drone use should be prohibited during seasons when birds are nesting and before young have fledged, when marine mammals are giving birth and still taking care of young, when migrating birds are feeding and recuperating on long flights to their wintering or breeding grounds. This would effectively mean

most of the year.

Deb Whitcomb  
Portland, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

Matthew Beck

**Commenter email (if provided):**

matthewbeck77@hotmail.com

**Public comment:**

Thank you for proposing the rule, I saw some videos that lead me here. I'm looking forward to it in the future. Pretty much the whole reason I fly is to get epic video of beautiful places.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, March 14, 2022

**Public comment:**

I do not want drones to operate within range of coastal seabird colonies, particularly during breeding season. Drones can be mistaken for aerial predators and cause entire colonies to flush, exposing their eggs to secondary predators like gulls. Seabirds are already at risk from various threats, including those caused by humans, and they do not need to be stressed further.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

Goly Ostovar

**Public comment:**

I suggest complete ban on drones take off, landing, and flying around in all Oregon State Parks and all along the coast and beaches as well as Smith Rocks. Reasons are safety hazard to aircraft, noise pollution, security and privacy risks, and damage to the wildlife, harassing nesting wildlife, and general degradation of the environment and quality of life in public lands. Perhaps just like there are dog parks and areas for dune buggies, and area can be established for people to play with their drones. They should not impose that kind of annoyance on the public with their toys.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

Dale March

**Commenter email (if provided):**

dmarch80@gmail.com

**Public comment:**

As a commercial and recreational pilot of UAS I am for providing guidelines such as those proposed that default to open access for takeoff and landing.

Coastal and other restricted flight areas could be handled similarly to no fly zones available on sectional charts and similar online tools (Airmap.com for example) as is currently the case for marine sanctuaries. This would provide an easy online method for knowing the current restricted areas. Additional local posting would also help in some areas. Restricting UAS activity all together would hinder the recreation of a growing community who seek to enjoy the outdoors from an alternate perspective.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

Zebulon Leech

**Public comment:**

As a nature enthusiast, FPV pilot and law abiding citizen I'm thrilled to see the parks department stepping forward with a common sense approach to allowing drones to be flown from within state parks. I would love for someone more knowledgeable about local park ecosystems to decide where drone operations can take place safely, in unison with both wildlife and other park visitors. This would allow me to experience all of Oregon's state parks, engage in my chosen form of recreation, and share those breath taking aerial views with those that may not be able to experience them first hand. Please pass the rules as currently written so we can all enjoy the beauty of nature together responsibly.





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

Scott W

**Commenter email (if provided):**

eagleeyevideo62@gmail.com

**Public comment:**

I am writing to you as an FAA Licensed UAS (Drone) Pilot who likes to fly for both commercial and recreational purposes in Oregon. I have been hearing concerning news about their being severe limitations placed on flying drones in Oregon State Parks.

I would like to know more about this and where I can contribute my opinions to this ongoing discussion.

Please let me know how to get involved.

Thank you.

Scott W.  
Eagle Eye Productions



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

Karin Lamberson

**Commenter email (if provided):**

karin.lamberson@gmail.com

**Public comment:**

I am in favor of more clarification of rules for drones. I do want to make sure the rules include protections for wildlife, especially nesting seabirds along the coasts. Some birds perceive flying drones as a threat, and may abandon their eggs or nestlings, leaving them open to predation by other species. Please protect wildlife when guiding drone operators and enthusiasts. Thank you.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

Sheila Foraker

**Commenter email (if provided):**

irideabike2@gmail.com

**Public comment:**

Good day,

I have watched with great interest the proposal to restrict drones from flying within Oregon state park boundaries. As the proposal exists, it reads as a good compromise: protecting wildlife habitat but not being overly restrictive to prevent pilots from shooting photos and videos of the beautiful area. The concerns I have is that there are people who want to restrict drones from flying in state parks except for small defined areas. These opponents are often people who do not like drones and want them banned everywhere. That is not the answer. Restricting flight over sensitive habitat is reasonable and open communication with the drone pilot community would go a long way toward everyone being satisfied with the outcome.

Overly restrictive regulations can and have backfired. Restricting drones to a very small area increases risk of in-air collisions between drones. Overly restrictive regulations also encourage rogue flight from the "I'll do it anyway" group. Both of these potential outcomes are not what anyone wants.

I am an FAA certified part 107 drone pilot who uses drones for my photography/video business as well as recreational flight. I do my best to educate new pilots and discourage irresponsible flight. I live in Arizona where we have many state parks with stunning scenery. It is my concern that draconian regulations could be used as a template for other states to follow. Please reconsider and do not implement a sweeping restriction against drones in state parks. As stated earlier, the proposal as written is a good compromise: sensitive habitat areas would be protected without banning drones from the state parks as a whole. Communicate with the drone community. I am sure that both sides of the aisle can work together to ensure an equitable solution for all.

all the best,  
Sheila Foraker  
Professional Drone Pilot



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

Megan Yax

**Public comment:**

Going down the path of banning everywhere except where allowed inevitably ends in parks being closed to almost all people and activity unless they have the money to have evaluations and studies to show they are safe.

Parks should allow as much use by as many people as possible, it's public property for all of the public to enjoy.

If there is a demonstrable issue than that is what should be addressed and nothing else. As the rule is written it strives to minimize unnecessary impact. This is the approach we should all want.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

JOHN GARDYNECKI

**Commenter email (if provided):**

GARDO7998@GMAIL.COM

**Public comment:**

I firmly believe using uav UAS aka drones in state parks is good thing... Like anything, use of any object / substance in the hands of the wrong person is problematic. Wrong doers will be wrong doers...



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

Meg DesCamp

**Commenter email (if provided):**

megdescamp@gmail.com

**Public comment:**

Please keep Oregon's state parks drone-free. The invasion of natural areas by buzzing, diving hunks of metal (or plastic; I admit I don't know drone construction) goes against what most people are after in a state park: the chance to explore areas of natural beauty without intrusive reminders of the everyday world. I'm sure someone somewhere is mounting an argument for the commercially beneficial use of drones in our natural areas but I'd love for that argument to be shot down in flames--perhaps by a drone.

Thanks!



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

Stefan Karlic

**Commenter email (if provided):**

limeystefan@outlook.com

**Public comment:**

Please protect the wildlife. We as humans are responsible for the decimation of wildlife around the world and every little thing counts. Thank you for considering this.





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

Joshua Williams

**Commenter email (if provided):**

spova@hotmail.com

**Public comment:**

Its important for any law to only specifically restrict what is necessary rather than restrict everything and only allow specific things. If there is a problem that law should address that problem as narrowly and specifically as possible. These specific issues the law addresses should be data driven with real facts revealing what the issues are.

Someone else simply feeling they are noisy and annoying is not a valid reason to restrict anything in a public space or nothing would be allowed especially children and pets.

The danger of drones is far less than many others we accept like driving, walking or riding a bike and tracking down a drone pilot is no more difficult that a driver or bike rider who often hits and run in Oregon.

This is not an area where over regulation and blanket bans will have a positive impact on anyone. According to data available drones poss a very small safety issue and the annoyance they cause will be replaced by numerous other noisy things.

The parks are for all to enjoy and share together accepting others activities. There are plenty of wilderness places those wanting to avoid all other people can go to escape noise and perceived hazards.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

Sonja Grove

**Commenter email (if provided):**

sonja.grove@gmail.com

**Public comment:**

Who came up with the idea that drones in the parks or the beach is the same as a kite? Our parks are sacred and we do not need the noise of Drones or the danger to sully them. I am so opposed to this idea. I am shocked that anyone in the state park agency would ever think this was all right?

Thank you for registering my strong opposition.

--

Sonja Grove EdD



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

Steve Griffiths

**Commenter email (if provided):**

sgoregon@gmail.com

**Public comment:**

Thank you for giving the public an opportunity to comment on the proposed new drone regulations.

I recommend that all state parks and beaches be closed to drone take-off and landings entirely during bird nesting and marine mammal calving seasons. During the rest of the year drone take offs and landings should only be allowed in state parks and beaches where staff park staff deem it would be safe to use them, based on the best available science.

The term "harass" needs to be defined in the rule and examples provided so all drone users know and understand what constitutes harassment when the term is applied to drone use on the Oregon coast.

Individuals who apply for a drone license should be required to take and pass a test that would measure their knowledge of drone regulations, what constitutes harassment, and where drones can and cannot be used on the Oregon coast.

Lastly, the committee formed to revise the rules seems to be weighted in favor of drone users and proponents. I hope you will pay close attention to the comments you receive from scientists, experts, and the public when it comes to revising drone rules and regs.

Much thanks for your consideration,

Steve Griffiths  
Lincoln City, Oregon

**Note: This public comment was accidentally omitted due to human error. We apologize for the mistake.**



## Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

Adam Slippy

**Commenter email (if provided):**

trailboss73@gmail.com

**Public comment:**

the current language of letting drones fly everywhere except where identified is a reasonable and acceptable compromise.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

Robert Wilhite

**Commenter email (if provided):**

robert@allianceco.com

**Public comment:**

Good Morning,

I have been a commercial drone pilot going on 8 years, with the majority of the time, in the film/entertainment industry. Currently, I was sought out to create a new drone division within a survey/engineering firm, so my experience flying in different environments is quite extensive.

Regarding your proposed State Park regulations, I do agree that it is a more conducive scenario of establishing the premise of operating a drone across the wide spectrum of park areas, with the intent focus of selected areas to restrict activity. The opposite scenario of proposed restriction across the board, with only targeted areas for activity, would definitely lead to more 'rogue' activity, due to the limited areas to fly.

Too many state and local jurisdictions misconstrue their ability to regulate the airspace, as the only regulatory entity that has full control of our national airspace is the FAA. Some parks in my area have restrictive regulations in place that contradict those of the FAA. Though, some local jurisdictions limit the activity by prohibiting launching/landing on city, etc. property, without verbiage of trying to control the airspace. This is the approach that many of my colleagues (and I) believe verbiage should be drafted.

Again, I applaud you for taking the approach of targeting limited areas to prohibit flight and my hope is the final draft would stipulate the non use of launching/landing on state park property, which is what you have true jurisdiction over.

THANKS!!!

Robert Wilhite  
ALLIANCE, LLC  
Director of sUAS Services  
Buford, Georgia



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

Kenny Williams

**Commenter email (if provided):**

paperboy11780@yahoo.com

**Public comment:**

We or I, as drone users are currently outnumbered by anti-drone folks and we need your help to keep the rules as proposed. Please keep the current language of letting drones fly everywhere except where specifically identified as an area not reasonable and have an acceptable compromise. Its not fair that we be restricted in every part of the state. The FAA is doing an excellent job of having control over their airspace as defined in their regulations. Please keep our regulations the same as this would sounds unconstitutional in my opinion. Thank you for reading my email.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

Sandy Polishuk

**Commenter email (if provided):**

sandypolishuk@gmail.com

**Public comment:**

No, no, no. We go to State Parks and fthe beach for relaxation and fun, not to be spied on and to have to tolerate the noise and nuisance of drones! JUST SAY NO!!!!!!

I tried to comment online but was unable to navigate the site, or maybe it wasn't working correctly.

Sandy Polishuk  
Portland





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

B Peterson

**Commenter email (if provided):**

tinker121356@gmail.com

**Public comment:**

Hello,

Please limit the use of drones on the coastal shore and other Wildlife areas. These birds/wildlife don't understand what's going on. Yes, there are many drones users who are responsible but there are many who aren't. Whose egos are more interested in a good photograph than the safety of our wildlife and environment.

As a photographer, I see that lack of ethical responsibility often with fellow photographers and drone users. They trample on sensitive areas, invade areas that are closed off from the public, put themselves in precarious positions just to get that picture or video. Sad fact. It's unfortunate we have to punish the good people to control the bad ones. But it needs to be done and we need to err on the side of the vulnerable.

All the state needs to do is look at Instagram or Facebook groups postings to see the bad behavior.

Thank you for allowing us to give our opinions.

B. Peterson  
Newberg, Oregon



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

Megan Hoff

**Commenter email (if provided):**

meganhoff7@gmail.com

**Public comment:**

Hello,

Thank you for providing this opportunity to comment on the use of drones in State Parks. I have personally witnessed several people fly drones at Seal Rock State Park and disturb the Black Oystercatchers--a species of high conservation concern--and their chicks, agitating the adults, and, consequently, chase away the drone. This effort expends valuable energy and leaves the chicks vulnerable to predation.

As a result, I strongly recommend all state parks and beaches be closed to drone take-off and landings except where they can be safely allowed. I also think that State Parks should determine where to allow drones based on the best available science.

As such, State Parks should create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts. While designated areas are being determined, status quo drone use would continue (i.e. this would not ban all drone use at any time during the process).

In addition, State Parks should include a final map(s) of designated drone take-off and landing locations on their website. In areas that are approved for drone use, include in the rules:

- No drone take-offs or landing to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas.
- Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.

All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time. State Parks should include strong enforcement mechanisms in final rules.

Thank you for your consideration and the opportunity to comment.

Best regards,

Megan Hoff

Resident of Lincoln County, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

Scott Law

**Commenter email (if provided):**

bullrhino@gmail.com

**Public comment:**

Thank you for accepting public discussion on the proposed changes to drone use in the state parks. I would encourage you to keep the current wording and language of the rules which lets drones fly everywhere except where identified as opposed to language which would increase the regulatory burden of the parks officials and unfairly restrict drone use where it is otherwise safe and reasonable. I respect and support the protection of the delicate balance of wildlife, and would even advocate additional public education steps through signage, public service programs, etc. The overreaching restriction of safe and reasonable drone usage is counterproductive to both the state and the people who enjoy capturing the magnificence and beauty of Oregon with flying cameras.

I am not a resident of your state, but enjoy visiting two or three times most years during which time I appreciate the opportunity to gather beautiful video and still images of the coastal and inland land and seascapes.

Again, thank you for being open to discussion and please keep your beautiful state drone friendly while protecting the most delicate areas.

Respectfully yours,

Scott Law



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

David Freund

**Commenter email (if provided):**

david@sneakpeakinspection.com

**Public comment:**

To whom it may concern,

As a licensed drone pilot using my drone for mainly business purposes, I am happy with the current proposed regulation which allows drones to fly everywhere with some restrictions in certain areas.

This sounds like a great compromise and I thank you for your hard work on this matter as I understand it must be tricky to find regulation that works for everyone.

Best,

Sneak Peak Home Inspection LLC  
David Freund



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

Elaine Rees

**Commenter email (if provided):**

ereesiris@gmail.com

**Public comment:**

As someone who enjoys Oregon's natural beauty and as a state park visitor, I submit that there should be no use of drones in our state parks. Drones interfere with the enjoyment of the scenery and introduce yet another unnatural sound into the environment.

An outright ban would be unequivocal. No discussions about intentions or suitability could cloud enforcement.

Thank you for the opportunity to comment, and please do what is right to preserve the air viewshed in our state parks.

Elaine Rees  
Eugene, Oregon



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

Phyllis Oster

**Commenter email (if provided):**

poster@easystreet.net

**Public comment:**

Hello we are writing regarding Oregon Parks and Recreation Department request for public comment on proposed Oregon Administrative Rules guiding take-off and landing of drones in state parks and along the ocean shore.

We are strongly against allowing drones in state parks and along the ocean shore. We are long time hikers and bird watchers. Our state parks and beaches provide much needed respite from the stresses of life, It is scientifically proven that time in nature is good for our health. Drones are not natural and do not belong in natural spaces. Our bird population is under assault from development and climate change. Drones are dangerous to birds. We fly kites at the beach. People have been flying kites for centuries. Kite flying is both relaxing and meditative and a great activity for kids. Drones will ruin kite flying on our beaches.

Drones are intrusive and annoying and have no place on our pristine State Parks.

Please do not allow drones in our State Parks and on our beaches. Thank you.

Phyllis Oster





# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Monday, March 14, 2022

## Commenter name (if provided):

Levi Davis

## Commenter email (if provided):

levisdavis@gmail.com

## Public comment:

Remote pilot comment and personal background that is hopefully seen as unbiased; yet experienced.

Can't say enough how important being able to operate is for me as a low-income, poverty-level, COVID displaced professional videographer. In my opinion, the ability to generate income from small un-maned aircraft is based on professionalism, proper maintenance, effective communication, and availability... let alone the actual craft of making purpose-driven imagery, scientific observations, and engineering-based solutions.

Just emailing today as I feel the need to make sure it is an available responsibility for our generation and the next. For example, my Grandfather, a WWII Veteran began flying hobby gas powered air planes decades ago... Started out as a string attached to the frame... waiting for the loud engine to run out of fuel. Then, a fellow WWII Vet created one of the worlds first remote control handheld devices for him, in small-town Cherokee, Iowa... This led to he and his eldest son building a plane in their garage... This eventually led me to passing an FFA Knowledge Test and to start a new career at 41-years of age.

The current drone market is very toy-like without spending tens of thousands of dollars to create custom-built aircraft in my opinion. At the same time, the evolution of the small-unmanned air craft will continue to develop as a sustainable, quiet, and truly wonderful opportunity / experience. Not that technology is "King." But, I do feel it will greatly assist.

Personally, I am a professional videographer looking to fly half-pound drones that are both quiet and steady as possible. Its not about the "show of flying the small drone." It's about the experience of being able to view and feel what is there for the viewer. As a professional pilot, new to the industry, I look forward to seeing how my view will change over time: perhaps more about engineering or scientific research than simply imagery?

I agree there are values to establish and to share about the topic. Its certainly a unique conversation in the sense of how shared airspace "operates."

Thanks for your time and consideration.  
Levi Davis



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

James Long

**Commenter email (if provided):**

jamesolong@icloud.com

**Public comment:**

They have no place in wildlife refuges and parks. They can disturb wildlife and not everybody using a park appreciates a drone buzzing around. Possibility of accidents. Children especially could get hurt.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

Scott Sanders

**Commenter email (if provided):**

b.scott.sanders@outlook.com

**Public comment:**

Good morning,

I'd like to comment on the proposed drone regulations that would eliminate or limit access to public lands and state parks in Oregon.

As a drone owner and pilot, I recognize the need to be respectful of others around me. The last thing I want to do is be "that guy" who is interfering with the ability of others to enjoy their day at the park or beach. I follow all FAA regulations and work to educate others about drones, safe operations, and the wonderful opportunities that modern drones provide to us in capturing breathtaking views of the Oregon Coast and state parks.

However, I do want to emphasize that there are plenty of existing regulations that are in place today. I think I understand the reasons why these proposed regulations are being considered, but I believe they will continue eroding our opportunity to enjoy these public lands. Instead of creating more legislation and regulations that limit or require additional licensing to enjoy these lands, I encourage you to consider leaving the regulation to the FAA. They have the enforcement necessary to regulate airspace effectively, and when I talk with other drone pilots, I always focus on educating them as to the proper way to register and operate drones safely.

Thank you for the opportunity to provide my comments.

Scott



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, March 14, 2022

**Commenter email (if provided):**

dbozroz1@gmail.com

**Public comment:**

To Whom it May Concern:

I'm from New Mexico but am writing to support legislation in Oregon to allow drones to fly in State Parks in yours, and all States of our country. I do understand that there would be exceptions to this rule, but in most cases it is a common sense judgement.

Sincerely,  
a drone hobbyist



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

Charles Arriola

**Commenter email (if provided):**

arriolac@sbcglobal.net

**Public comment:**

To Whom It May Concern,

My name is Charles Arriola and I live in Murray, KY. As a new drone pilot I was a bit shocked by the amount of rules attached to flying a drone. As time has went on it has become clear that it isn't that there are too many rules but instead a lack of laws that are fair to both the public and the drone pilot. The law that might be passed in your state is a great rule. My understanding is that it allows flying drones in most areas in a state park with the exception of a few. Most laws governing drone flight in state parks restrict flight to a few places and prevent flying in most areas. The passage of this legislation could sit the bar for the rest of the country and my hope is that with that in mind that this proposal will become law. Thanks for your time and being willing to be a trailblazer in drone laws in state parks.

Sincerely,

Charles Arriola



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

Diane Collings

**Commenter email (if provided):**

dccollings@gmail.com

**Public comment:**

Please limit the use of drones, model airplanes in State Parks and along our shoreline to help protect our wildlife. Thank you.

Diane



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

Betty Hemmingsen

**Commenter email (if provided):**

bettyhemmingsen@gmail.com

**Public comment:**

Dear Oregon Parks Department

I am writing in support of a ban of all drone take-offs and landings on all Oregon public lands. I understand that the state has no jurisdiction over the air, but by eliminating the ability to launch drones on public land you may be able to limit the number of drones flying over our precious places that must be protected for the sake of wildlife and the enjoyment of the public.

Thank you for your consideration.

Betty Hemmingsen  
Eugene, OR





# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Monday, March 14, 2022

## Commenter name (if provided):

David Stone

## Commenter email (if provided):

dns@efn.org

## Public comment:

National parks ban drone use in those parks. Oregon Parks should too.

1. Any needed clarification should state "Drone use in state parks is not allowed in any Oregon State Park, including beaches, anywhere, any time". No one would be confused by that.
2. The legislature (under pressure from a private group in Muncie, Indiana with a financial interest in selling drones?) passed a law providing " permission for OPRD to work with the community to adopt fair, sensible rules. The only fair and sensible rule is an outright ban on use of drones in state parks.

When I and most other park visitors go to parks and beaches, we expect a quiet, undisturbed experience. Drones greatly diminish such an experience. Several drones completely destroy such an experience. As a bird watcher, I have watched birds leave the area when a single drone flew over the beach I was visiting. Doesn't this "harass, disturb" the birds?

Many other park and beach visitors are also disturbed by the noise of drones. You park rules already prohibit "Using or operating any noise producing machine, vehicle, device or instrument in a manner that disturbs or may disturb other park visitors. . ." All drones make disturbing noise.

All it takes is several drones operating on a beach to empty the beach of all visitors, leaving the beach for the sole use of drone operators. Not fair. After a while, non-drone operators will avoid such beaches altogether.

They also prohibit "Obstructing, harassing or interfering with a park employee or peace officer in the performance of their duties" Haven't you heard of harassment of voting poll workers? How will such a rule be enforced? Your rule will put park managers at risk from the many anti-government "I will not comply" sorts.

Your proposed rules leave too much un-enforceable discretion to the operators. Who is to say what is "reasonable and prudent" Will objectors have to testify in court?

If you insist on allowing drone use in parks and beaches, you must restrict such use to one or two days per weekday (no weekends).

Thank you for doing the right thing.

David Stone  
Springfield



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

Toby Weiss

**Commenter email (if provided):**

tobias@weissproductionsllc.com

**Public comment:**

Good day,

Photography and videography are a passion and business for me. Limiting access to beautiful parks is of course a concern. Aerial shots complement handheld photography and open up possibilities for my new business venture. I would not want us to be over protective then have those that are willing to break the laws get the best images. May I suggest instead the following.

1. Limit more sensitive areas to those with a part 107 license. We spent many hours learning regulations and are more likely to uphold them.
2. Only select the most sensitive areas for restriction.
3. Differentiate between those that have valid business reasons and licenses from pure recreational flyers.

Let's make sure we don't cause unintended consequences from new regulation. Thanks for your consideration.

Toby Weiss



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

Susan Tone

**Commenter email (if provided):**

susantone@nehalem.tel.net

**Public comment:**

Please prohibit drone use from sensitive habitat areas on the Oregon Coast. I am a volunteer Plover Patrol member, and I have seen people fly drones over nesting Snowy Plovers in Managed Habitat areas on the Nehalem Spit. If kites are not allowed during the nesting season (period of restrictions) then certainly drones should also be disallowed. Personally I am opposed to drone use in any sensitive habitat area at any time of year, but I implore you to prohibit drone use during Snowy Plover nesting season. Otherwise people will intentionally use them in attempts to get photos of nesting birds and new born chicks and that would be very dangerous for these birds as they struggle to reproduce on our beaches.

Please contact me if I may provide further information.

Thank you,  
Susan Tone



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

Ron Braithwaite

**Commenter email (if provided):**

ron@braithwaites.net

**Public comment:**

I am writing to ask that you please not ban drones in Oregon State Parks. As a landscape photographer, being able to fly a drone to capture images of our beautiful state parks is incredibly important to me. I have my FAA Part 107 Certificate and am always careful to follow all applicable rules. In addition, I try to be very aware of other guests in the state parks (and everywhere that I work) to avoid impacting their experience.

Please put me on any applicable notification lists, since I would like to be kept up to date with developments around this proposed regulation and I would like to testify in any hearings on this subject, since this definitely impacts my ability to create art of my beautiful home.

Sincerely yours,  
Ron Braithwaite  
Gresham, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

Ron Spies

**Commenter email (if provided):**

bassmanron57@yahoo.com

**Public comment:**

Dear OPRD,

I am fortunate enough to live on the Coast near Depoe Bay where there is a lot of sea bird life. I feel that drone use needs to be halted in seabird nesting areas during the time when chicks are being hatched and raised. These birds are already partially stressed due to ocean changes that are affecting the food supply. I think that the best available science should be used to determine where and how long a drone ban should be in effect. Also, a seasonal drone ban would need to be enforced or it means nothing. I am all in favor of first trying to educate an offender. If that doesn't work, then a ticket might get the point across.

Sincerely Yours,

Ron Spies  
Depoe Bay, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

Joel Pollack

**Commenter email (if provided):**

jpollack.cv@gmail.com

**Public comment:**

Dear OSPD leadership team, As proposed, I feel the regulation currently proposed is constructive and well-considered. As a drone pilot I am well aware that many are asking for tighter constraints on where drone pilots may take-off and land, especially in picturesque locations like Oregon. As a former Oregonian who raised my family in Oregon and Washington, and as an FAA Part 107 Certified sUAS Remote Drone Pilot, I am always seeking out safe and acceptable places to film with my drones. While I no longer live in Oregon, but I do own property in the area and return frequently. I take great care to protect wildlife and never fly where my flights would be intrusive to those enjoying the beautiful natural resources. This means that I plan each flight according to certain risk mitigation factors and where my mission will safely interact with the surrounding environment and fellow park enthusiasts. Risk assessments are performed to determine if the flight could be hazardous to people, wildlife, the environment, and property. I am not alone amongst serious drone pilots who understand that our actions drive regulation and strive to not only fly responsibly, but to instruct newcomers to the drone flying of what is acceptable and what is not. That said, I respectfully ask that you proceed as written with the "Proposed Park Area Rules - DRAFT OPRD Drone Take-off and landing rules." I completely agree that the current language of letting drones fly everywhere except where identified is a reasonable and acceptable compromise. In too many places the opposite is true. In some places that place egregious taxes on flying in parks which is not in keeping with the open park concepts that Oregon has followed through the years. If you would like to discuss this with me my email and phone contact is below. Thanks in advance for your help in supporting reasonable drone regulation in Oregon. I look forward to reading the final ruling.

Best regards,

Joel M. Pollack Wingspan Drone Photography  
San Jose, CA  
FAA Certificate #4394017





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

Craig Harrigan

**Commenter email (if provided):**

craigharrigan1955@gmail.com

**Public comment:**

Your proposal on operating drones in state park is a good plan, to let drone fly everywhere except a few areas.

There a group out there that is wants to ban drones from flying everywhere except a few areas which I think would be not very safe.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

Loran Courpet

**Commenter email (if provided):**

lseeourpet@comcast.net

**Public comment:**

Just saw an article that mentions a proposal of drones flying in State Parks. I think the way it is written is a good compromise between being able to fly anywhere and not being able to fly.

Loran Courpet



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

Tim Ahlers

**Commenter email (if provided):**

timahlers206@gmail.com

**Public comment:**

Hi,

I own property in Corvallis, Oregon where I grew up and I currently reside in Washington state.

I'm a drone pilot and hold a Part 107 certification for commercial drone flight. I wanted to send you feedback that the current language of letting drones fly everywhere in state parks except where identified is a reasonable and acceptable compromise.

Thanks,  
-Tim Ahlers  
Seattle, WA



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

Michael Hickey

**Commenter email (if provided):**

miichaelhickey@gmail.com

**Public comment:**

Dear OSPD leadership team,

As proposed, I feel the regulation is smart and protectively efficient. I realize that there are some groups in Oregon that desire tighter constraints on where drone pilots may take-off and land, particularly along the beautiful Oregon coast. As an Oregon-based travel and documentary producer and FAA Part 107 Certified sUAS Remote Drone Pilot, our glorious seashores have become one of my most favorite aerial and ground film locations. As a devout Oregonian and humble outdoorsman, I take great care in doing my part to help keep Oregon beautiful by remaining proactive about protecting our unique wildlife and the abundance that flows from our many invaluable natural resources. This means that I plan each flight according to certain risk mitigation factors; one being that of how a proposed aerial mission will interact with the surrounding environment. Risk assessments are performed to determine if the flight could be hazardous to people, wildlife, the environment, and property. Based on my experience with and observation of other Oregon drone pilots, we all cherish the natural beauty that is Oregon and remain dedicated to appreciating and caring for her for many future generations to come. At this, I respectfully ask that you proceed as written with the "Proposed Park Area Rules - DRAFT OPRD Drone Take-off and landing rules." I adamantly agree that the current language of letting drones fly everywhere except where identified is a reasonable and acceptable compromise. Should you wish to contact me for further comment, you can reach me at [phone number] or via email at miichaelhickey@gmail.com I thank you for your time and I look forward to reading the final ruling! Thanks

Michael Hickey  
Lake Oswego, Or



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

Josh Gann

**Commenter email (if provided):**

jgann055@gmail.com

**Public comment:**

As an Oregonian, I feel the need to send you a comment in regards to the proposed take of and landing of drones rule. I am a FAA Part 107 pilot for a state agency and a search and rescue group.

I am concerned about the overreach of your proposed rules. We have some of the most beautiful coastline in this country, and we love to capture the unique vantage points that the drones allow us. You already have banned areas near bird habitats, and we avoid those areas as we should. By banning the rest of the coast, you are closing a large population of hobbyists from doing what they love. It is unnecessary and an overly cautious approach to a non-existent problem. I hope that you make intelligent decisions and do not ban drones along the coast. If you would like to discuss further, you can email me back. Thank you.

Josh Gann



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

Stuart Freeman

**Commenter email (if provided):**

skyadspdx@gmail.com

**Public comment:**

To whom it may concern,

My name is Stuart and I am a local Drone Pilot in the Portland Metro area. I fly drones primarily at work documenting construction sites. I am concerned with recent proposals to change drone laws, effectively making it illegal to fly drones. The current language is sufficient, reasonable and acceptable to most professional drone operators. It makes sense to have some select areas which prohibit drone usage, for protecting wildlife, or sensitive areas. It is not reasonable to ban drone usage all together, with the exception of a few areas. There is a big difference between the two. I urge you to consider this carefully and I hope that the current language remains.

Thank you for your time and consideration.

~Stuart Freeman



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

Stephen Castle

**Commenter email (if provided):**

rvtrc1@gmail.com

**Public comment:**

As a retired traveler who visits Oregon State Parks,( I even get the emails) I am concerned about the proposed drone flight restrictions. The wording amounts to an almost total no fly zone. Nobody questions the need to protect wildlife, the public, and the beauty of the landscape. What concerns me is the wording that amounts to a restriction, except in certain locations. I have seen this before where everyone is forced into a limited area, which causes a problem of overcrowding.

I would prefer that the wording be stated where only the critical areas are protected and other areas open to environmentally sound flights.

I realized drones have gotten a bad reputation from non compliant operators. Any new product suffers growing pains. Once a law is passed it is very hard to modify or repeal as times change. An example is self driving cars, people are scared of them but they are proving to be safer than human drivers.

Drones are the newest form of photography/video. People want to capture the beauty Oregon offers



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 14, 2022

**Commenter name (if provided):**

Steve Grider

**Commenter email (if provided):**

sgrider@bellsouth.net

**Public comment:**

I am a FAA Part 107 Remote Pilot and believe that drones operators should be permitted to takeoff, fly and land in state parks according to FAA guidelines. No drone zones should be limited to sensitive or controlled areas only. A blanket ban, or restriction unless permitted is wasteful and completely unnecessary.





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, March 14, 2022

**Public comment:**

It is now fully confirmed that this proposed rule making is nothing more than an interest to regulate a problem that does NOT exist. Where the board has offered up fears and suggestions of need they have done so without basis in reality. This was validated with a Freedom of Information Request submitted to OPRD on February 19th. The request sought the following: "all records of OPRD incidents or encounters where a drone was believed to have been used to harass, disturb, pursue, or injure wildlife. Please also provide a count of incidents where the OPRD was informed of personal injuries within Oregon state parks or beaches from the use of or by a drone" for all items from 9/1/2016 to 2/18/2022.

The FOIA response was returned (exceeding late - a non-compliance for FOIA standards) by Chris Havel, Oregon Parks and Recreation Dept., (d) 503-986-0722, (c) 503-931-2590, [chris.havel@oregon.gov](mailto:chris.havel@oregon.gov). The response clearly articulates that OPRD has not had any issues with drones and that this rule making is only looking to solve a problem that doesn't exist. Here is the response:

"Sorry for the delay. A preliminary search has turned up no documents matching this request. I've asked our IT folks to do a more thorough search and will let you know (probably by Monday) if it produces anything." - note, nothing further was received.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Sunday, March 13, 2022

**Commenter name (if provided):**

Pat Douglass

**Commenter email (if provided):**

pdouglass49@gmail.com

**Public comment:**

The proposed rules which provide clarity for drone pilots, hobbyists and the general public to know where drone take-off and landing is allowed and prohibited within a state park and along the ocean shore are well thought out and practical for everyone. Please pass the rules as originally written. Thank you for considering the drone communities input and recommendations.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Sunday, March 13, 2022

**Commenter name (if provided):**

Robin Grisham

**Public comment:**

Please cease and desist! Do not allow this proposed rule to be set in motion! The wildlife will be grossly and negatively affected by the drones if this is allowed. Whole colonies of seabirds and land birds and other wildlife will be seriously hurt by these drones. Please have a heart and keep all wildlife safe!



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Sunday, March 13, 2022

**Commenter name (if provided):**

Jenn Gridley

**Commenter email (if provided):**

jenngridley@gmail.com

**Public comment:**

Please prohibit and enforce no drone flying in OR State Parks and beaches to prevent the harassment and decline of native birds.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Sunday, March 13, 2022

**Commenter name (if provided):**

APRYLE CRAIG

**Commenter email (if provided):**

apryle@uw.edu

**Public comment:**

I am against expanding drone access along seashores and parks. Expanding drone use along seashores and parks negatively impacts native birds. Birds see drones as a threat to their nests and territories and may attack.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Sunday, March 13, 2022

**Commenter name (if provided):**

Ian Walton

**Commenter email (if provided):**

lokiquake@gmail.com

**Public comment:**

There are already laws and rules in place that regulate bad behaviors that drone pilots and other do, like harassment of wildlife, reckless endangerment and disturbing the peace. Just enforce those rules. How many people went to prison over the years because they had a similar law that you could not possess marijuana in a state park, while people legally drinking alcohol reeked havoc in the parks? Please use common sense, even if you dislike drones for whatever reason.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Sunday, March 13, 2022

**Commenter name (if provided):**

Dan Kelley

**Commenter email (if provided):**

dankhoosier@gmail.com

**Public comment:**

Please limit and/or restrict the use of drones in natural areas and our state parks. thank you.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Sunday, March 13, 2022

**Commenter name (if provided):**

Mike Durkin

**Commenter email (if provided):**

mdurkin@att.net

**Public comment:**

I am a part time resident of Manzanita and photographer. I frequent the beach and Nehalem Bay State Park both causally and as a photographer. While I have a drone, I have not mastered it and don't actually launch at either place, for now. As a visitor of these sites, I have run into drones, but very rarely and the pilots have been conscious of the fact they are flying in sensitive areas, both for other people and wildlife. I can see putting some rules together to keep the inconsiderate in check, but not so many restrictions it detours and controls respectful and professional from visiting these places. We do not want to be known as an unfriendly state to traveling videographers and photographers.





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Sunday, March 13, 2022

**Commenter name (if provided):**

Roy Davis

**Commenter email (if provided):**

rdavis103@gmail.com

**Public comment:**

Hi, please allow drone take off and landings in regards to the proposed rules.

This is an important opportunity for the people to responsibly enjoy and have fun with drones while respecting and enjoying nature.

Thank you!



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Sunday, March 13, 2022

**Commenter name (if provided):**

Jeff Sorn

**Commenter email (if provided):**

jsorn@msn.com

**Public comment:**

Hello,

I'm an avid drone enthusiast and appreciate the current unrestricted take-off and landing rules. I'm a registered voter in Oregon and fly recreationally according to current FFA rules and in a safe manner. Additional state take-off and landing rules would encumber and adversely effect my enjoyment of state managed resources. Drone photography and video is a rewarding way for to enjoy our state lands.

Jeff



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Sunday, March 13, 2022

**Commenter name (if provided):**

RONALD BROWN

**Commenter email (if provided):**

rbrowngps@hotmail.com

**Public comment:**

Please adopt yopur rule as it is written. I am an FAA certified remote pilot, and a properly certified (TRUST) recreational pilot, as well a former manned aircraft pilot. I am nearing retirement and can no longer afford general aviation and drones in now my only way to enjoy recreational aviation. I support reasonable rules, and punishing those who vialate those rules, not banning, or severely restricting everybody from enjoying avaition as an afforable hobby.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Sunday, March 13, 2022

**Commenter name (if provided):**

Nadine Fiedler

**Commenter email (if provided):**

nfiedler@comcast.net

**Public comment:**

Please, no drones! They destroy the peace and serenity provided by our beautiful natural places.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Sunday, March 13, 2022

**Commenter name (if provided):**

Norman Bland

**Commenter email (if provided):**

normanbland@btinternet.com

**Public comment:**

I think the proposed no take off and landing areas to protect wildlife and other sensitive activities is a great approach to this, allows those activities to go unhindered but also allows those who wish to use drones to enjoy the park and inevitably promote the park by showing others their footage can only be a good thing. Well done to those involved in coming up with this measured and sensible approach. Let's hope this approach will be noted and copied by other areas, not only within the USA but else where in the world.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Sunday, March 13, 2022

**Commenter email (if provided):**

sg@wavepath.net

**Public comment:**

Responsible flying has always been a critically important part of model aviation as a hobby or profession. It is imperative that pilots have sufficient information to make good decisions and keep everyone safe. Drone operators should always fly with safety as top priority, and telling them where it may be dangerous to fly (and why) will help everyone have a positive experience.

Banning drones because they "harm wildlife" is a gross overreaction to a relatively minor problem that can be easily solved with basic signage and limited restrictions.

(I am an R/C pilot of 10 years. If you really want to help wildlife, ban all human activity in parks. No? Then let us do our thing in peace. Thanks.)



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Sunday, March 13, 2022

**Commenter name (if provided):**

Michael E

**Public comment:**

I believe the proposed rules for recreational drone use inside of state parks are incredibly fair! It'll set a precedent for other parks as well with how this goes. Opening up the park for recreational drone flying and informing pilots of sections where they cannot fly will be an opportunity for even more beautiful films and pictures of these state parks which will entice people to check out these parks. So that they can see the vistas for themselves, increasing awareness of these state parks and the beautiful views they offer, and just how fun it can be to be out in nature. Thank you for proposing these rules!



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Saturday, March 12, 2022

**Commenter name (if provided):**

Katie Duzik

**Commenter email (if provided):**

katieduzik@gmail.com

**Public comment:**

I believe that drones should be limited seasonally on the Oregon coast, particularly around seabird colonies and other sensitive habitats.

I understand drone use is a growing hobby and that there is demand, but I have witnessed firsthand the natural resource conflicts that arise from their growing popularity.

Drones are also an invasion of privacy and take away from the enjoyment of nature, in addition to frightening wildlife and disrupting foraging and nesting patterns. Our state parks, particularly the beaches, are a place of peace and solace for many. Being filmed from above by a recreational drone can change that experience in a negative way.

Please consider at least seasonal restrictions on drone use on ocean beaches and near sensitive wildlife areas, and establishing designated "Natural Areas" as drone free.

Thank you for all you do for our public lands,

Katie Duzik





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Saturday, March 12, 2022

**Commenter name (if provided):**

Robert Wasilewski

**Commenter email (if provided):**

robwas@gmail.com

**Public comment:**

As a responsible and respectful of others pilot that enjoys drone photography I would LOVE nothing more than having some reasonable rules in place that would allow flights within your state parks. Understandably we all have to share our public spaces and even as a pilot I see how drones could be disruptive but an outright ban has been really unfair.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Saturday, March 12, 2022

**Commenter name (if provided):**

Adam Bronstein

**Commenter email (if provided):**

adam.bronstein@gmail.com

**Public comment:**

Drones have no place in State Parks unless video footage or other sensor data is needed for a special project and a permit should be required. Keep our natural areas natural, quiet and wildlife friendly. Natural places (what's left of them) are being turned into playgrounds.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Saturday, March 12, 2022

**Commenter name (if provided):**

Scott Hites

**Commenter email (if provided):**

droneservicesandphotography@gmail.com

**Public comment:**

I'm a certified uas pilot and respect the rules and regulations to protect wildlife and such as seal pus, birds nesting and such. So protecting these areas from launching and landing of drones I'm in favor of. But not totally restricting the flight of drones in areas of the coastline and parks I'm not in favor of these restrictions. I'm also a business who fly for services. Drone services and photography. I provided all types of photography and videography of these areas. Thank you for taking these comments in favor of drones, uas, and unmanned aircraft.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Saturday, March 12, 2022

**Commenter name (if provided):**

Matthew M Mastrangelo

**Commenter email (if provided):**

sparksthewolf@gmail.com

**Public comment:**

I agree with having only certain areas off limits for flying.. like known nesting areas not harassing wildlife and other people. Following general faa recreational rules. Possibly even just setting up a simple flight request tracker, you just log in and say you plan on flying that day at that spot just so the rangers have an idea of how many people are gonna be flying that day. I would limit to recreational use only or drone size restrictions and commercial operations should have to set up a specific date and time with the parks system , because if it is fully open then I see people bringing larger professional drones and flying.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Saturday, March 12, 2022

**Commenter name (if provided):**

Jerry Hauth

**Commenter email (if provided):**

jerryhauth@yahoo.com

**Public comment:**

The use of Drones in our State Parks and Beaches should only be used for emergency purposes.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Saturday, March 12, 2022

**Commenter name (if provided):**

Gregory Harp

**Commenter email (if provided):**

harpeggio@gmail.com

**Public comment:**

It appears to be a good, common sense proposal which I overwhelmingly support and hope becomes a model across the country



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Saturday, March 12, 2022

**Commenter name (if provided):**

Mary Beth Hicks

**Commenter email (if provided):**

earth.huggy@gmail.com

**Public comment:**

I am writing to request that the use of drones be seasonally paused around sensitive natural resource areas including the coast. Specifically, limit drone use around colonies of seabirds during the nesting season. Nesting shorebirds have been negatively affected by drones, and these populations are already sensitive to habitat loss and other threats. Please consult experts on the impacts and how to avoid them with well informed seasonal timing.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Saturday, March 12, 2022

**Commenter name (if provided):**

LR Brown

**Commenter email (if provided):**

Zaplela@gmail.com

**Public comment:**

I'm strongly against the use of drones on public lands. They can be used to harass wildlife, make people enjoying nature feel watched and surveilled, and become debris and litter if damaged and lost.

Having designated drone spaces is fine, or the use of drones for specific uses like filmmaking or ecological monitoring.





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Saturday, March 12, 2022

**Commenter name (if provided):**

Rachel Ruppel

**Commenter email (if provided):**

rachel.ruppel@gmail.com

**Public comment:**

I am writing with three concerns, first about the impact of drones on wildlife, particularly for birds nesting on and near the ocean shore. I appreciate that the proposed rules place some limitations on drone use in snowy plover areas and marine conservation areas, but I don't think these proposed protections are adequate. More should be done to protect known areas that wildlife frequent, and where seabirds nest.

Second, I am concerned that there is not enough care and consideration being made for recreationists who enjoy our undeveloped ocean shores and more remote state parks, for the quiet enjoyment of nature. The buzz and hum of drones overhead may not alter the experience of other users in a developed day use or picnic area, but it is a distraction and intrusion on quiet solitude out on hiking trails, sand dunes and beaches. I strongly encourage OPRD to set aside some spaces for solitude and serenity and disallow drones in these areas.

Finally, the way I read the proposed regulations it sounds that drone users will need to look up on the state website where they can and cannot operate drones; this is insufficient and unrealistic. If OPRD wants to regulate drones effectively, there must be on-site signage as well as on-the-ground enforcement, in addition to website info.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Saturday, March 12, 2022

**Commenter name (if provided):**

Bill Teter

**Commenter email (if provided):**

teterwa60@gmail.com

**Public comment:**

There is an old saying about how people should behave in parks, "Take nothing but pictures, leave nothing but footprints". For the vast majority of drone owners, that is exactly why they fly - to take pictures that capture the natural beauty from an otherwise unobtainable perspective. And they don't even leave footprints behind. Isn't that exactly the idea of recreation that the parks were established to provide? Now anyone who loves nature knows that there is a time and a place where human activity must be limited such as migratory bird rookeries during nesting season, campgrounds at night, etc.. where such restrictions are based on science, not personal opinion that drones are "evil". I am a licensed drone pilot and the folks I fly with go out of their way to avoid problem areas, even if they are allowed under FAA rules. A blanket ban would not command my respect because it is not based on specific objectives. It would be like banning cameras because people get too close to the wildlife to get a good picture. Finally, I believe a blanket ban would violate ADA laws. Many parts of a park are not handicap accessible, but with a drone someone can soar far beyond where their chair can go. They can see what the able-bodied can see, isn't that the spirit of making the parks more accessible. The current restrictions are well tailored to balance access with interference, I urge you to reject the calls for a wider ban.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Saturday, March 12, 2022

**Commenter name (if provided):**

Ava Ryan

**Commenter email (if provided):**

avryan2391@gmail.com

**Public comment:**

Drones are honestly one of the most obnoxious equipment I have ever encountered in the wilderness. The incessant buzzing and whirring detracts from the experience of the outdoors and I think they should be banned from state parks as they have in national parks (not that many people adhere to those guidances anyway). Additionally, I have had the unfortunate experience of people flying drones into areas in which I was camping (during the evening and at night both times at designated campgrounds) and not only was that obnoxious but it felt like an invasion of privacy. If you do decide to implement a ban on drones, please ensure that you have the funds and staff capacity to enforce it. Thanks for all you do!



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Saturday, March 12, 2022

**Commenter name (if provided):**

Evan Heisman

**Commenter email (if provided):**

heisman@gmail.com

**Public comment:**

Drones should not be allowed in Oregon State Parks. These locations are sanctuaries for both wildlife and people looking to escape the 'drone' of city life. Allowing drones in state parks runs counter to these.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Saturday, March 12, 2022

**Commenter name (if provided):**

Kim Jarema

**Commenter email (if provided):**

jaremakim@gmail.com

**Public comment:**

I do not agree drones should be allowed at state parks. People go there for solace, peace, and privacy which can't be found with the unnatural sound of a drone or a drone hovering over your head that could possibly be filming/photographing you.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Saturday, March 12, 2022

**Commenter name (if provided):**

Timothy Moore

**Commenter email (if provided):**

mnwi.photos@gmail.com

**Public comment:**

Drones should not be allowed on our beaches or state parks. They are a total invasion of privacy and they harass wildlife along the coastal beaches.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Saturday, March 12, 2022

**Commenter name (if provided):**

Joe Blalock

**Commenter email (if provided):**

joeblalock23@gmail.com

**Public comment:**

I am in favor of responsible drone operation. I fly drones as part of photography. Many parks in the northwest have scenic material. Common sense says stay away from habitat or bothering fellow recreational activities.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Saturday, March 12, 2022

**Commenter name (if provided):**

Gary Hayes

**Commenter email (if provided):**

gary@explorermediagroup.com

**Public comment:**

I would prefer that drones are not allowed on Oregon beaches without a permit. They are harmful to wildlife, notably nesting seabirds and they are an unwanted distraction when trying to enjoy the natural environment.





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Saturday, March 12, 2022

**Commenter name (if provided):**

LeRoy Teller

**Commenter email (if provided):**

leroyteller@frontier.com

**Public comment:**

As a drone operator i am against any new rules where drone are to be prohibited, the majority of drone pilots know its wrong to disturb birds and other wildlife , I have flown at parks and beaches for some time without any issues , I feel it more danger to the wildlife by humans disturbing them than drones flying over capturing photos and video's , Drones can observe from a safe distance to where humans get as close to them as they can . I hope Parks and Recreation authorities will not propose changes in statw parks and along our Oregon coast.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Saturday, March 12, 2022

**Commenter name (if provided):**

Nate Harris

**Commenter email (if provided):**

bucketnate@gmail.com

**Public comment:**

The restriction on where you CANNOT take off from is the best approach in my opinion. If I were to go out in my neighborhood with my drone right now that's exactly how it would work. I'd be able to take off anywhere I want except for specific areas. If I was limited to where I could take off from I swear I wouldn't even fly anymore. The consistency on how you're able to launch your drone is important.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Saturday, March 12, 2022

**Commenter name (if provided):**

Randy Morgan

**Commenter email (if provided):**

rmrandy316@gmail.com

**Public comment:**

Cell phones have cameras people carry cameras, and camcorders. Yet they are still legal in Parks and other places. Drone pilots are no different. They're drones carry cameras and video as well. So there really is no difference in whether or not it's a cell phone, a camcorder, or a drone. Only difference is, most drone pilots are respectful of others. Drones should not be allowed to fly over people, roads, bath houses or restrooms. Just as cell phones and camcorders should not be allowed in these areas either.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Commenter name (if provided):**

Jerry Freeman

**Date comment received:**

Saturday, March 12, 2022

**Commenter email (if provided):**

videoshooter@live.com

**Public comment:**

I think these rules are a great compromise.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Saturday, March 12, 2022

**Commenter name (if provided):**

MARIAN JONES

**Commenter email (if provided):**

dtkkjones@yahoo.com

**Public comment:**

60 something year old guy here and would love to be able to operate legally my drone out of some state parks. Ive almost stopped flying because really anything you want to take any kind of video or pictures in Oregon its a state park. Any time Ive ever thought about bringing my drone out in some park area I;m afraid I'll be surrounded by drone haters. So yes I'm in favor of making some drone is ok spots in public parks.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Saturday, March 12, 2022

**Commenter name (if provided):**

Chad Schulze

**Commenter email (if provided):**

schulzechad85@gmail.com

**Public comment:**

The proposed rule is fair as it stands. Unfortunately some people do just do not like drone or discriminate against them out of fear. It would be a missed opportunity to do a total restriction on drones. The video and photos of the park would draw many more people to the park system. They're not just photos or videos they are art, that thousands of people view and enjoy. That would attract people to the parks to enjoy. Also it gives the opportunity to someone with physical limitations the ability to see something they otherwise couldn't. There are also benefits for the park system. Some one goes missing and drones aren't restricted it would be a very quick response to help look while they are already out. It could also save time in other emergency situations. I'll use this for example. A drone operator spots a fire that is not known about in a remote area and no body else is around to report it. They are able to report it quickly, which cuts down on response time possibly limiting the fire to a small area and not turning into a all-out wildfire, saving the park and tens of thousands of dollars and man power trying out a wildfire out. Thank you for the opportunity to comment.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Saturday, March 12, 2022

**Commenter name (if provided):**

Kim Tyson

**Commenter email (if provided):**

kimtyson@hotmail.com

**Public comment:**

I want to thank you for providing your consideration to include the drone hobby that I enjoy so much. Having areas, like state parks, where we have open air and beautiful scenery to explore, and capture, can get harder and harder to find. I firmly believe that state parks should be equally shared by everyone. That means we need fair rules in place that protect everyone's freedom while also respecting the park grounds, to include the creatures on it.

I support a rule that is inclusive of drone operators, and I understand the need to provide boundaries or exclusions based on the protection of animals or other circumstances.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Saturday, March 12, 2022

**Commenter name (if provided):**

Adam Stewart

**Commenter email (if provided):**

9shallrise@gmail.com

**Public comment:**

I think this is a great proposal and it goes to show that the world actually can come back the other way from all of the tight legislation we've seen in the last decade, and perhaps one day meet in the middle, to allow all people to recreate in the ways they prefer and choose. I support the opening up of more areas for take-off and landing, and I hope this spreads further and inspires other state parks to do the same. The most beautiful scenery in our country is within these parks and I think it's an absolute shame that there are rules about using / capturing this beauty for personal enjoyment. Thank you very much for this proposed change!





# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Saturday, March 12, 2022

## Public comment:

Please do not restrict the taking off and landing of drones in Oregon State parks. Drones are already banned in National Parks, making it difficult to find places to fly legally. Drones taking off and landing in State Parks present relatively little nuisance and a ban is likely to push people to the borders of State parks where there is more likely to be population that would be bothered by the drones. Please do not restrict take-off and landing for drones in Oregon State Parks.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Saturday, March 12, 2022

**Commenter name (if provided):**

Daniel Tucker

**Commenter email (if provided):**

info@tvfuh.com

**Public comment:**

I am a commercial drone pilot and owner of The View From Up Here.

I am glad that the ultimate authority of drone use is recognized as the FAA

I want to insure that any rule is based in fact and not just a general dislike for drones.

Drone pilots are also park visitors, local business owners, taxpayers, and Oregon citizens.

Is a drone anymore disruptive to wildlife than people or vehicles?

\* Drone leave zero trace they were there...

\* no footprints,

\* no garbage,

\* no lingering pollution (besides the sound of a bee swarm.. that leaves when the drone it gone) and new propellers have cut that sound dramatically.

1. There should be an options at ALL state parks and beaches to fly a drone, unless there is a valid wildlife endangerment issue.... and if using a drone presents a greater risk than other permitted human activity.

2. There should be a CLEAR path to getting a permit ON THE WEBSITE if needed and the permit fee should be reasonable in comparison with other park use fees.

a. A clear permit process can be used limit the number of drones (only x permits per day),

b. limit the time frame (only 30 min before and after sunrise), and;

c. give park staff more enforcement tools.

C. ORS 837.300(4) should be amended to add the words "model aircraft".. as in 'drone or model aircraft'. It just seems we are picking only on quad-copters here.

D. Add a requirement for the take-off and landing zone of a drone to be clearly identifiable for use on ALL state properties. (landing pad or signage)

E. Add a requirement that the 'remote pilot in command' must be clearly identifiable when taking off and landing on all state property. (vest, hat, etc..). Remote pilot in command is defined in FAA

## Section 107.19



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Commenter name (if provided):**

John Key

**Public comment:**

Needs to be done. I am all for it.

**Date comment received:**

Saturday, March 12, 2022

**Commenter email (if provided):**

Vulcannomad@gmail.com



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Saturday, March 12, 2022

**Commenter name (if provided):**

Brian Waagner

**Commenter email (if provided):**

bwaagner+rc@gmail.com

**Public comment:**

I have been active in the hobby of building and flying radio-controlled aircraft for more than 20 years. I build and fly fixed-wing model aircraft and first-person-view quadcopters for recreational purposes. I fly in accordance with FAA regulations and the safety rules established by the Academy of Model Aeronautics. I am a volunteer instructor pilot and regularly work with beginners as they enter the hobby. Even though my interest in rc aircraft is entirely recreational, I hold a Part 107 FAA commercial drone pilot license and a ham radio license issued by the FCC.

I am fully in support of the proposed Oregon Administrative Rules permitting take-off and landing of drones in state parks and along the ocean shore. Flying rc aircraft is a safe and educational outdoor recreational activity enjoyed by thousands of people throughout the country. Model airplanes, helicopters, and quadcopters can be flown in safely in public parks and nature preserves without disrupting wildlife or other recreational activities.

It is not true that all drones are "noisy" or "dangerous" or "creepy." Electric-powered drones and rc aircraft are often nearly silent and present almost no danger to the public. Onboard cameras allow pilots to experience the thrill of flying and to photograph landscapes, not to spy on their neighbors.

I applaud the Oregon Parks Department for proposing rules that would allow drone enthusiasts to enjoy the hobby safely and legally. I hope that other public parks will take a similar approach.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Saturday, March 12, 2022

**Commenter name (if provided):**

Roberto Almeida

**Commenter email (if provided):**

roberto10241973@icloud.com

**Public comment:**

Drones cannot be banned from national parks, they are a wonderful tool to capture images that will never be possible without them, people anti drones need to change their perspective of Drones and look at it as what they are, they are a tool - not a treat.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Commenter name (if provided):**

Mats Nordgren

**Public comment:**

Please allow drone flying in public parks.

**Date comment received:**

Saturday, March 12, 2022

**Commenter email (if provided):**

mats.nordgren@gmail.com



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Saturday, March 12, 2022

**Commenter name (if provided):**

Kevin Jones

**Commenter email (if provided):**

kjonesfactor62@live.com

**Public comment:**

I support this measure to allow use of drones in state parks under the guidelines proposed. This is a recreational hobby for many, including myself.





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Saturday, March 12, 2022

**Commenter name (if provided):**

Daniel Bowie

**Commenter email (if provided):**

bandaidbowie@gmail.com

**Public comment:**

Our State parks are outstanding places for recreation and can have a place for drones as a form of recreation. The proposed rule change is a good balance for Drone enthusiasts to enjoy our State Parks and all that they offer. Creating Drone takeoff/landing zones is an excellent way to allow this recreational activity in safely.

Restricting the takeoff/landing to specific areas outside congested areas such as campgrounds and wildlife areas will provide the Drone enthusiast a unique experience to our exceptional parks for visitors and native residents.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Saturday, March 12, 2022

**Commenter name (if provided):**

Raj Damani

**Public comment:**

Drones allow travelers to capture beauty of a place. Oregon is a beautiful place and banning take-off/landing of drone will impact tourism in longer term. The current rules need not be changed.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Jeffrey Markham

**Commenter email (if provided):**

automan75@gmail.com

**Public comment:**

Allow take off and landing of drones to 107 certified pilots.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Robert Watters

**Commenter email (if provided):**

watters.robert@gmail.com

**Public comment:**

Hi there, as a regular visitor to oregon state parks (several dozen visits per year) I believe that for the sake of the shared enjoyment of the park and protecting the natural nature of the areas, drones should only be allowed for special purposes. Drones should only be permitted on a per-use basis in support of specific goals (a documentary, disc golf coverage, etc) that support the public at scale, and not for simple personal recreational use.

Recreational drones affect the enjoyment and safety of all patrons while benefiting only them personally. A fair scoping of the rules would restrict drone use to reviewed special cases that are in the public interest.

Thanks,

Rob Watters  
Milwaukie, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Paul Hodgetts

**Commenter email (if provided):**

paul@hodgettsfamily.com

**Public comment:**

Oregon State Parks are for the enjoyment of all Oregonians, including those who responsibly fly their drones. It's unfortunate some seek to exclude others.

I encourage OPRD to enact the rule as proposed. It represents a good balance of everyone's right to enjoy our state parks. It is entirely reasonable to restrict drone operations in overnight camping areas, and in specifically designated no-fly areas.

It should be kept in mind that any park can implement restrictions for identified areas, whether they be for wildlife habitats or areas that need to remain undisturbed. These areas typically represent a small portion of most parks, although some parks could very well be entirely restricted where necessary.

Implementing an overall ban on drones would place an unreasonable burden on each park to specifically identify the areas where drones could be allowed. It is far more reasonable to identify those areas where they should be restricted, and the rules as written form a reasonable overall template for most parks.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Barbara Harrison

**Commenter email (if provided):**

kamakz@yahoo.com

**Public comment:**

Drones disturb wildlife along the Oregon shores and also people who value the calm that the sea and beaches foster. Please consider these realities when drafting your drone regulations. I daily walk Bandon-area beaches as a longtime Coast Watch volunteer. I shall be watching and listening!

Most sincerely,

Barbara Harrison



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Friday, March 11, 2022

## Commenter name (if provided):

Michael Eaquina

## Commenter email (if provided):

meaquina@gmail.com

## Public comment:

Reading through the public comments so far, there are a lot of misconceptions about drones. Oregon cannot regulate the air space over state parks. That domain belongs solely to the FAA. Thus completely prohibiting the take off and landing of drones outside of all state parks would not actually prohibit drones from state parks.

The rules as proposed are acceptable. It would empower the park staff to deal with rogue drone operators who do not follow the regulations while allowing professional and recreational flyers a reasonable opportunity to capture photographs and videos of some of the most beautiful places on earth. It would create areas as needed that are free from unmanned aircraft for the enjoyment of all park visitors and prevent the take off and landings in campgrounds. Most importantly, it would create areas where the use of drones are still allowed for the enjoyment of recreational flyers and part 107 certified pilots. This, to me is the best compromise between all users of our ocean shores and state parks.

As stated above, completely banning drones would not empower park staff to deal with nuisance operators as they can just position themselves outside of the park boundaries and continue to fly. The proposed regulation changes would be the best solution to allow responsible drone pilots to continue to fly while weeding out the irresponsible parties.

Thank you for the opportunity to provide my input.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Steve Trauba

**Commenter email (if provided):**

steve@trauba.com

**Public comment:**

Hello,

My name is Steve Trauba and I am writing to voice my non-support of the proposal to restrict drone flight operations to a few select portions of Oregon State Parks. I am currently working on my FAA Part 107 certificate and have really enjoyed seeing, filming and photographing areas around the west. There are so many great areas, like the Oregon State Parks, that we, as drone pilots, can help others enjoy as well. Very much like a hunter taking a hunter's safety course and test helps them be a more responsible sportsman, receiving the Part 107 certificate helps drone pilots fly drone operations responsibly and also helps mitigate risk, while at the same time allows us to enjoy the areas that we are flying in.

The reason I am not in support of this proposed change is that the areas that are being proposed are too small and add a level of complexity to be able to fly in, specifically, increasing the risk of too many drones in these areas which could lead to crashes and accidents. The current language of letting drones fly everywhere except where identified is a reasonable and acceptable compromise.

Thanks for your time.

Steve Trauba





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Greg Reverdiau

**Commenter email (if provided):**

greg@pilotinstitute.com

**Public comment:**

To Whom It May Concern,

This is a public comment regarding the proposed park area rules regarding drone activity. As currently proposed, the rules are the best compromise for drone pilots and for the community in general. Over the years, we have been involved with many municipalities, park services, and local governments in drafting drones rules over the years. We have found that overly restrictive drone rules lead to low compliance rates and put an unnecessary burden on officials who are trying to enforce the rules. Instead, an approach with common sense localized restrictions where drones should not be flying is easier to enforce and will yield to better compliance rates.

As such, please keep the proposed rule as is and avoid prohibiting drones from flying everywhere in state parks.

Kind regards,

Greg Reverdiau  
Co-founder, Lead Instructor  
pilotinstitute.com



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Klee Miller

**Commenter email (if provided):**

klee.miller8@gmail.com

**Public comment:**

The current language of letting drones fly everywhere except where identified is a reasonable and acceptable compromise.

- No drone take-offs or landing to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas.

Klee Miller



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Phillip Nichols

**Commenter email (if provided):**

scotchmandr@gmail.com

**Public comment:**

Regarding the proposed New Drone Law for State Parks... I believe that Michigan has the best compromise on their books and yours appears similar. There are less problems when take off is permitted everywhere EXCEPT certain areas than the opposite. More excessive restrictions simply lead to more law-breaking. That has proven true in many legal areas. Flight over the parks are already allowed under Federal regulations so that only certain minor restrictions may be useful.

Thank you  
Phillip Nichols



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Roger Moffatt

**Commenter email (if provided):**

roger.moffatt@gmail.com

**Public comment:**

I'm writing to support the current proposed OPRD Drone Take-off and landing rules in my capacity as a FAA registered Part 107 drone pilot operating in a neighbouring state (Washington).

It is an unfortunate reality that the increasing use of drones and inappropriate flights, either by hobbyists who are perhaps unaware of the rules governing their use, or those who choose wilfully to disregard any applicable rules, is rightfully leading states to consider additional regulation of the use of sUAS's. I fully support balanced regulation that enables safe and law abiding drone use whilst making it clearer which areas are to be considered out of bounds, and of course it is only right and proper that the state is able to rule on these matters.

The current proposal at

[https://www.oregon.gov/oprd/PRP/Documents/PRP\\_RUL\\_Draft\\_Rule\\_Revisions\\_DronesInStateParks\\_02-15-22.pdf](https://www.oregon.gov/oprd/PRP/Documents/PRP_RUL_Draft_Rule_Revisions_DronesInStateParks_02-15-22.pdf) is to be commended for taking a balanced approach and supports allowing appropriate drone activity everywhere EXCEPT designated restricted areas, rather the opposite approach that would prohibit EVERYWHERE aside from what would inevitably be a very small number of permitted areas. The latter approach leads to denser, more crowded skies, increases the chance of collision and or injury, and in my view is overly restrictive on qualified and safe UAV pilots who do respect both the airspace and those around them.

Thank you for proposing regulation that balances the desires of drone pilots with the needs to protect wildlife etc.

Roger Moffatt  
Washington State



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Brian Brodsky

**Commenter email (if provided):**

brian\_brodsky@hotmail.com

**Public comment:**

As a recreational & P107 UAV "drone" operator who also enjoys solitude in public wilderness, I think take-off and landing of drones should not be prohibited or restricted. If anything, a noise restriction should be considered.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Steven Palmer

**Commenter email (if provided):**

spalmerphoto@outlook.com

**Public comment:**

I am a resident of Southwest Washington. The current language of allowing drones to fly everywhere except where identified is a reasonable and acceptable compromise.

Thank you for your consideration.

Steven Palmer Photographic Art



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Friday, March 11, 2022

## Commenter name (if provided):

Craig Fisher

## Commenter email (if provided):

cfisherus@gmail.com

## Public comment:

I am a person who takes my family on vacations for two weeks each year to Oregon. I am also a photographer who flies drones, professionally. I have enjoyed the great experience and opportunities that Oregon has given me to fly drones in your State Parks taking pictures and videos of the magnificent settings of their scenery. I have many friends who I have encouraged to go after watching my videos, taken in the State Parks.

I have found, through my past 6 years piloting drones that people have a misconception about a drones ability or intentions because of many enhanced stories by the press. I try to be an ambassador for drones to the public and explain their functions.

Drones are very recreational for my family, even my youngest grandchildren fly them. It would be a terrible idea to change the present way that the State Parks are administrating the current use of drones in your Parks. In over 100 hours of flight time I have logged over several years flying your Parks I have yet to receive a complaint. Please don't change the current rules.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Michael Taylor

**Commenter email (if provided):**

miracleiu2@gmail.com

**Public comment:**

Hello,

I am a photographer and nature lover, and I am writing to SUPPORT the current approach in Oregon State Parks of allowing drone use EXCEPT in specific areas.

We, the citizens and taxpayers in Oregon, have given many of the most beautiful areas of our state to the care of the State Parks system. As a responsible drone pilot and photographer, I appreciate the opportunity to enjoy these areas and share them with others through my art.

I understand that there may be specific areas that drones could be a problem (such as wildlife nesting areas) and I am good with respecting these restricted areas, and I think that OSP currently does a good job of posting these rules.

Please DO NOT CHANGE the rules to unnecessarily restrict the entirety of our State Parks (except for limited specified areas) from my enjoyment and use.

Thank you,

Michael A Taylor





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Jim Manuel

**Commenter email (if provided):**

jmalbyga@gmail.com

**Public comment:**

Ladies and Gentlemen,

I'm writing to you as an interested party from Georgia and a friend to all Oregon drone operators.

It is my understanding that Oregon is looking at possibly changing rules to fly drones in their State Parks.

Audubon Portland (<https://audubonportland.org/take-action/urge-state-parks-to-protect-wildlife-by-regulating-drone-use/>) is currently pushing hard to PROHIBIT drones everywhere except for a few places. This is the opposite of the current (and reasonable) approach, which is to ALLOW drones everywhere except for certain areas.

In many instances throughout our country our liberties and freedoms are threatened because great legislation is passed but not fully enforced, or not enforced at all. Please review existing laws and provisions, and the associated enforcement efforts. I encourage you to do everything possible to ensure that these measures are enforced to the fullest extent BEFORE considering actions that limit enjoyment of the land.

Thank you  
Jim Manuel  
Albany GA



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

JP Nieves, Sr.

**Commenter email (if provided):**

Group1207@outlook.com

**Public comment:**

Dear Sirs:

As a New York State resident and a recreational flyer, I recently took and passed the FAA Part 107 exam just to be educated on the regulations.

I understand there are people who will not follow rules and that is a fact of life.

As someone who has worked over 30 years enforcing Federal laws, I understand the need to set the rules for those who refuse to follow them.

We should try not create laws that will let those who follow the rules be punished for those who do not care about the law.

I also do not want the wildlife to be disturbed and agree with the current language of letting drones fly everywhere except where identified is a reasonable and acceptable compromise.

Thanking you in advance for your time and consideration,

JP Nieves Sr.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Dan Mitchell

**Commenter email (if provided):**

danmitchell002@gmail.com

**Public comment:**

Greetings,

I'm a responsible and professional UAS operator. I have my Part 107a certification and actually took a full UAS Piloting course to expand my knowledge beyond the Part 107 requirements. At all times, I remain sensitive to other people and wildlife and have enjoyed many positive interactions with curious onlookers; in fact, far more of these interactions than negative discourse, which I've also been successful in de-escalating.

Based on my experience in the UAS community, this is predominantly the standard we strive to maintain; to be able promote our activity responsibly and encourage positive interaction with others.

Please establish and sustain UAS flight rules for Oregon State Parks where drone flight is allowed everywhere except in specific sensitive areas, particularly where sensitive wildlife and nesting are concerned.

Oregon State Parks should be available for all to enjoy, including responsible UAS operators.

Kind regards,

Dan Mitchell

State of Oregon citizen, voter taxpayer (and most importantly, annual State Park Pass subscriber!)



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Bernhard Racher

**Commenter email (if provided):**

bernhard.racher@gmail.com

**Public comment:**

To whom this may concern:

I am against the new proposal by the Audubon Society to prohibit drone use in any state park. Protected wild life areas are already restricted air space in Oregon. The current language of letting drones fly in approved air space except where identified seems a reasonable and acceptable compromise.

In my opinion a new measure would cause more harm than good. An educational "do not disturb wildlife" campaign for all, including beach goers, surfers, climbers, etc will be energy better spent in the long run.

Thank you for hearing me out,  
Best regards,  
Bernhard Racher



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Bud Kuenzli

**Commenter email (if provided):**

kuenzli@gmail.com

**Public comment:**

Folks,

As an environmentalist and drone hobbyist I want to say that I support the ban on drones from habitat critical areas along the coastline. I believe that identifying those critical areas and making them off limits to drones makes good sense. I do not feel that making a blanket ban on drones and providing a few limited areas is a reasonable approach. Many drone pilots, such as myself, are older and no longer able to hike and enjoy the wilderness as we once did. As a retired photographer and educator, I now find flying my drone and creating images and video to be a wonderful pastime that I can continue in spite of my age and disabilities.

Thank you for your time and consideration.

Bud Kuenzli



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Jeff Folger

**Commenter email (if provided):**

jeff.foliage@gmail.com

**Public comment:**

Sirs:

I've been made aware of the proposed new changes which I support.

I would like to say I'm a part 107 pilot, I'm retired Air Force and I was an aircrew member with 9,000+ hours in the air. I like to think I'm very careful when flying due to my background. When I fly, I do so as a photographer and I'm not flying very low. (within VLOS and flight rules for UAS).

I realize that there are some people out there who have less respect for the rules and they make all of us look bad.

But by trying to keep them (and us) from flying outside of a few areas, you punish the rest of us who respect the rules. To be honest those few will fly anyway and all we can do is try and educate them to follow the rules. Or we report them to the FAA.

I hope we can keep the fly everywhere and just block out small sections that have wildlife that need to be protected or there are lots of people (visitors) that should not be flown over.

Thank you for your time

--

Jeff "Foliage" Folger



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Jeremy Smith

**Commenter email (if provided):**

jeremy.kent.smith@gmail.com

**Public comment:**

Thank you for allowing us to partake in nature's beauty by operating and maintaining Oregon's State Parks. I also want to thank you on behalf of my grandchildren who will be able to experience them as I have due to your due diligence.

As a Part 107 Licensed Drone Pilot, I would like to state, for the record, that the current language of letting drones fly everywhere except where identified in Oregon's State Parks is a reasonable and acceptable compromise that I fully support. Again, thank you!

Respectively,

Jeremy Kent Smith



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Andrew Dean

**Commenter email (if provided):**

andrewjfdean@gmail.com

**Public comment:**

Dear Sirs,

The current proposed rules changes for the use of Drones within the State Park that would allow the use of drones within the state park by allowing them to fly everywhere except where identified is a reasonable and acceptable compromise.

The changes being proposed by Portland Audubon would effectively ban most drone usage in the parks, if this same language was applied to other activities within the parks it would effectively ban the use of the State Parks by the public.

If drone usage is banned within the parks it will encourage illegal drone usage and prevent the education of drone users about responsible usage of drones within the parks.

Therefore I would strongly recommend allowing drones to fly everywhere within the State Parks except clearly identified areas and the education of drone users on responsibly usage by encouraging training and certification so as ensure the building of a self regulating drone community.

--

Regards  
Andrew Dean





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Steven Madsen

**Commenter email (if provided):**

sb.madsen@hotmail.com

**Public comment:**

Hello,

As a licensed Part 107 drone pilot in SW Washington, I wish to express my support for the current proposed Oregon State Parks drone regulations creating space restrictions on drone access in sensitive areas of the park system. I believe these proposed regulations represent a reasonable compromise between the growing enthusiasm for flying drones, particularly in unpopulated areas, and the need to preserve critical habitats, viewsapes and soundscapes. Thank you for your efforts in this area.

Steven B. Madsen  
Cougar, WA



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Nancy Bailey

**Public comment:**

First of all I want to thank you for allowing the opportunity to comment on the draft rules regarding drone take-off and landing on State Park lands. I understand that when used responsibly, drones can be an enjoyable way for some users to enjoy our natural spaces, and I believe drone operators deserve to have a place to fly safely and without negatively impacting others. However, from my experience it appears that a very small percentage of drone pilots actually know, understand, and follow the rules. To sum up what I have seen, drone use usually benefits a single person while disrupting the overall experience of numerous other park visitors. Drones can and do invade other users' personal space and are noisy in places where solitude, quiet, and privacy are desired.

I live on the Oregon coast, spend time on the beach several days per week, and personally see examples of irresponsible and illegal drone use on a fairly regular basis during the seabird nesting season. My husband and I volunteer as monitors for nests of Black Oystercatchers (a species of concern) and have witnessed firsthand how territorial Oystercatchers are towards drones, chasing any drones that are within hundreds of yards and leaving nests with eggs and/or chicks unguarded against ever-present aerial predators for significant periods of time. The unfortunate reality is that many drone pilots on the coast are irresponsible and ill-informed about Federal regulations regarding the harassment of wildlife. Several drone operators I spoke to said that they always check the FAA app on their phone and say it is OK to fly.

I would suggest banning drone use on ocean shores from Mar 15 through Sept 1 to avoid conflicts with nesting seabirds, as recommended by the US Fish & Wildlife Service in this article about the effects of drones on nesting seabirds - <https://medium.com/usfwspacificnw/drone-use-putting-pressure-on-nesting-seabirds-on-oregon-coast-b77241ca73ec> To protect the rights of the majority of park visitors who are not there to operate a drone, I believe the default should be for park areas or beaches to be closed to drone take off and landings unless otherwise allowed. This would align more closely with US Fish & Wildlife policy and thus create similar expectations for drone users.

In addition, I believe drone operators should be required to obtain and pay for permits to operate in State Parks and on ocean shores. Interestingly, Washington State allows drones in State Parks by permit only - <https://www.parks.wa.gov/1080/Remote-Controlled-Aircraft> In addition to allowing monitoring of drone usage in their area of purview, requiring permits would provide revenue to OPRD, an organization which doesn't have the funding to finance "drone police". Enforcement will always be a thorny issue with drones because drone operators engaged in irresponsible/illegal activities can be difficult to locate. However, requiring all drone operators who wish to launch and

land within State Parks and other public areas of the coast to register and invest financially would help to curtail irresponsible/illegal drone operations. All drone operators flying for commercial purposes should be subject to a standardized, fee-based special use permitting process. Strong enforcement mechanisms should be part of the rules.

Drones should not be allowed in any crowded areas including but not limited to, parking lots, campgrounds, popular beaches and rock-climbing spots, etc., to ensure the safety of the public.

As currently written in section "OAR 736-010-0040 Visitor Conduct (9) (f)", and "OAR 736-021-0100 Visitor Conduct (5) (g)", the rules say "Proposed zones will be posted on the department website", language which is much too vague. To make it as convenient as possible for drone operators to know where it is legal to fly, I would strongly recommend to have all State Park prohibited areas available on a single interactive GIS-based map on a highly visible web page somewhere on OPRD's state-level website (for example, under the "Plans, Rules, Permits" section). This map would provide "one stop shopping" where drone users could zoom and pan to their area(s) of interest. All too often when I have talked directly with drone operators who are flying illegally (usually harassing Black Oystercatchers), their response is "I didn't know". Ignorance of the law is never a valid excuse, which means education of the average drone user is going to be extremely critical to the success of OPRD's implementation of the new rules. Along these same lines, Oregon's drone rules need to be somehow integrated with the FAA's regulations, perhaps by offering links to the FAA regulations on the same OPRD website as the map.

State Parks should create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts using the best available science.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Glenn Bisby

**Commenter email (if provided):**

bisbyg@comcast.net

**Public comment:**

I am in full support of the change in rules to allow drones to fly in Oregon State parks.

Thank you



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Seth Halligan

**Commenter email (if provided):**

seth@makeitknownmedia.com

**Public comment:**

To whom it may concern,

I agree with some the proposed concepts in the upcoming regulations. However I ask that you change the wording to Drones are allowed to fly everyone except these areas.

Having only certain "drone zones" could lead to more collisions and make the situation less safe while encouraging more amatuer drone pilots to break that rules. Being able to fly everywhere except the no fly zones will ensure more people adopting the new changes as well be similar to other regulations outside parks where drones are not allowed to fly.

Thank you for taking the time ro read my letter and consider changing the proposed rules.

--

Seth Halligan



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Richard Bauer

**Commenter email (if provided):**

email@bauerdrone.com

**Public comment:**

Hello,

NOTE: I grew up in Redmond OR, and graduated from Redmond High School.

The current language of letting drones fly everywhere EXCEPT where identified is a reasonable and acceptable compromise.

I absolutely support the CURRENT language.

Thank you.

Richard Bauer



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Josh Kaye-Carr

**Commenter email (if provided):**

admin@appleexpert.com

**Public comment:**

Hello,

I would like to express my opposition to new legislation being considered to severely restrict recreational and other drone operations in Oregon State Parks.

I support restricting drones from sensitive habitat and other areas in state parks as determined by wildlife studies, but oppose wholesale banning of drone operations in parks in general.

In other words, it is fine to disallow drone operations in certain select areas of parks where it will interfere with the health and safety of wildlife and persons, but I oppose banning operations across the board and then only allowing operations in a few severely limited areas. These are 2 entirely different approaches and I oppose the more Draconian version being considered.

I support a reasonable and scientifically applied approach to this issue. Wholesale banning is NOT the answer.

Josh Kaye-Carr



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Eirik Toft

**Commenter email (if provided):**

eirik@portlanddroneracing.com

**Public comment:**

I had a chance to review the proposed rules:

[https://www.oregon.gov/oprd/PRP/Documents/PRP\\_RUL\\_Draft\\_Rule\\_Revisions\\_DronesInStateParks\\_02-15-22.pdf](https://www.oregon.gov/oprd/PRP/Documents/PRP_RUL_Draft_Rule_Revisions_DronesInStateParks_02-15-22.pdf) As a current part 107 UAS operator, I find this is the best compromise I've seen. I would personally endorse this ruling and see it as not only a fair compromise, but just a common sense law that helps emphasize the importance we place on our wildlife areas, but also opens up opportunities for those of us who enjoy getting videos of some of Oregon's treasures to share with the world.

For what it's worth, I fully endorse this ruling and compromise.

Eirik W. Toft





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Angel Planells

**Commenter email (if provided):**

acplanells@gmail.com

**Public comment:**

Good morning, as a fellow Pacific Northwesterner (residing in WA state), it would be great for anyone to visit the state parks to have designated areas to fly a drone so they are doing their hobby/craft without being a nuisance to the general population. I understand smaller parks, but there is a lot of land that could be explored via drone without disturbing the animals/wildlife/sensitive plants.

I know we cannot fly in WA state unless you apply for a permit, but many of us that are drone hobbyist want to get scenic footage and follow all of the FAA rules and regulations.

Thanks in advance for putting regulations in place to allow drone hobbyist to enjoy our local, state and federal lands

Angel Planells  
Seattle, WA



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Friday, March 11, 2022

## Commenter name (if provided):

Tony Mason

## Commenter email (if provided):

optstickman2@hotmail.com

## Public comment:

While I think the current rules are preferable, these proposed rules are a very good and well thought out compromise and I support them. As a long-time hobbyist photographer, I fly a small GPS camera drone to make images (and some video) of our beautiful state for personal use and I try very hard to "play by the rules" as confusing as it sometimes is.

Hopefully when implemented, there will need to be an easy way to find out where not to take off/land from both online (maybe in conjunction with an app like "B4UFLY") and at the parks themselves (for those areas where internet is unavailable). Clear, understandable, and easy to access information will be key to the success of these rules.

Photographing from both standing on my feet and flying a few hundred feet in the air (to get those unique perspectives and access to areas that I could not safely get to on foot) really add to my enjoyment of our State Parks.

After reading a few of the already posted public comments, I would like to respond in a general way (and please remember, that like most things in life, there is more than one right answer) ...

Specifically, about Smith Rock - I could say that I find all the white chalk marks around the hand holds on the rock face and trails at the rock base are offensive and distracting and that rock climbing should be banned. But I won't as I realize that this is a premiere rock-climbing spot, and I would not want to "yuck on other people's yum". So I have to spend some extra time cleaning up the rock of white spots in a photo editing app. OK, so be it. Plus, I do enjoy watching the climbers make their way up the face.

I could also say that I find just having other people on my favorite beaches annoying (when compared to how it was 50 years ago, yeah, I'm an old fart). So, we should have tickets and reservations to take a stroll on the sand (to keep the numbers of people visiting to a minimum so I can have a "solitude experience")?

Taking pictures/videos of other park visitors without their consent is allowed either from on the ground or in the air. You are in a public space and should have no expectation of privacy. So if drone cameras are banned, so should cameras in general as they could "invade citizens personal privacy" (written in a sarcastic voice).

But that is enough of that. I would like to thank all the committee members who spent their time and energy to compile these proposed rules. And thank you to all the people who have provided comments (although I may personally disagree with some, that's what's great about this system). I do believe these proposed rules are a good compromise and would really hate seeing a "blanket no-fly" policy or a "only fly on certain days" (since flying is highly dependent on weather conditions, i.e. wind & visibility).

Thank you,  
Tony Mason  
Coquille, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Robert Velez

**Commenter email (if provided):**

robvelez@gmail.com

**Public comment:**

To Whom It May Concern,

I am a drone pilot from Tacoma WA and heard the news regarding the changes being discussed regarding possible changes in Oregon State Parks. First I agree rules should be in place whether to allow or restrict pilots and drones to perform certain activities. As an outdoor cyclist and hiker I understand when enjoying nature and something buzzing is in the air then happens to be a drone interrupting the peace that you were expecting. I respect rules and nature so these upcoming changes I'm mindful that will cause more disruption.

Please keep the current way how drones are handled where they can be flown everywhere except select locations.

Second, by restricting to flying in certain or same locations, it would be more dangerous and likely to create more accidents because of high amount of air traffic. These 2 changes would create more frustration for drone pilots to break these restrictions by flying elsewhere further causing more interruptions for everyone.

Third, these restrictive rules can lead to ignorance of rules which will make it worse for everyone including state parks spending more money trying to enforce such rules. If we can keep what's in place currently, it will hopefully satisfy drone pilots, state parks and the public.

Thanks for reading and understanding.

Best,  
Robert Velez  
Tacoma, WA



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Terrance Allan

**Commenter email (if provided):**

tmallan180@gmail.com

**Public comment:**

Hello,

I am a drone pilot and support the notion of having clearly understood guidance on where it is not authorized for me to launch and land my drone. I fly a camera drone and use it to take nature and landscape photos for my personal enjoyment. I support rules that will protect and preserve our wildlife or other sensitive nature areas. However, preventing me from flying in the state parks and beaches (generally) will prevent me from enjoying my hobby. I support this idea if the rule identifies where it is not appropriate for me to fly my drone and I am opposed if the rule only identifies where it is permissible for me to fly.

Thank you for your consideration.

Terry Allan,  
Tualatin, Oregon



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Doug Davis

**Commenter email (if provided):**

motolizard@motolizard.com

**Public comment:**

I wanted to offer a comment about the thoughts of changing the laws concerning drones in Oregon state parks.

I feel that the current language of letting drones fly everywhere except where identified is a reasonable and acceptable compromise.

Thank you.

MotoLizard



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

William Daugherty

**Commenter email (if provided):**

william@will-do.com

**Public comment:**

Hello

I'm a Part 107 sUAS (drone) pilot from New Hampshire. I have travelled to your great state on numerous occasions and am hoping to be back there soon. I applaud the current effort to allow drone flights within Oregon state parks with exceptions for sensitive areas. This makes sense and will stop punishing those of us that actually follow the rules.

Thanks for your time and consideration.

-William

FAA sUAS Part 107 cert: 4490949

William Daugherty

Will-Do IT Services



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Tony

**Commenter email (if provided):**

info@aerialnorthwest.com

**Public comment:**

As proposed, I feel the regulation is smart and protectively efficient. I realize that there are some groups in Oregon that desire tighter constraints on where drone pilots may take-off and land, particularly along the beautiful Oregon coast. As an Oregon-based travel and documentary producer and FAA Part 107 Certified sUAS Remote Drone Pilot, our glorious seashores have become one of my most favorite aerial and ground film locations.

As a devout Oregonian and humble outdoorsman, I take great care in doing my part to help keep Oregon beautiful by remaining proactive about protecting our unique wildlife and the abundance that flows from our many invaluable natural resources. This means that I plan each flight according to certain risk mitigation factors; one being that of how a proposed aerial mission will interact with the surrounding environment. Risk assessments are performed to determine if the flight could be hazardous to people, wildlife, the environment, and property.

Based on my experience with and observation of other Oregon drone pilots, we all cherish the natural beauty that is Oregon and remain dedicated to appreciating and caring for her for many future generations to come.

At this, I respectfully ask that you proceed as written with the "Proposed Park Area Rules - DRAFT OPRD Drone Take-off and landing rules." I adamantly agree that the current language of letting drones fly everywhere except where identified is a reasonable and acceptable compromise.

Should you wish to contact me for further comment, you can reach me at [phone number] or via email at info@aerialnorthwest.com

I thank you for your time and I look forward to reading the final ruling!

Most graciously,

Tony





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Harrison Gould

**Commenter email (if provided):**

[harrison@imagesbyharrison.com](mailto:harrison@imagesbyharrison.com)

**Public comment:**

Hi Guys/Ladies...Good Morning,

I need this little message to be quick...I don't want to be late to my photography job later today which may, if the weather stays nice, will include a drone.

I am a Part 107 FAA Certificate owner and professional Photographer. Have been for about 45 years. My main source of income is from my Wedding Photography but in the last few years, I'm looking to have my cameras fly instead of lugging them on my shoulders. One has to move with technology plus I'm not a teenager any more...cameras are heavy. I have found that with flying drones I can maintain my income but the rules imposed by non FAA officials that want to go beyond the FAA rules...are creating 'Air Blocks'. I just want to make a living. No different than when 'Plane, Trains & Automobiles' made their presence within their historical timeline. I would bet that they too had to prove to the general public that all these new streams of income are not a bad thing.

Let me put this in simple terms. The FAA are our friends. They look out for air safety, general public safety and yes...environmentally protecting our world. Let the FAA lead you to your decisions...not the few who fear progress is the devil. With regard to the Oregon State Parks and their proposed new rules...following the FAA allow UAV operators to make a living along with allowing us to keep our planet pretty and safe.

Thank you and have a great day,

Harrison Gould



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Marie Wakefield

**Commenter email (if provided):**

wakefieldm\_2000@yahoo.com

**Public comment:**

Thank you State Parks for providing this opportunity.

I suggest the following-

- Recommend all state parks and beaches be closed to drone take-off and landings except where they can be safely allowed
- State Parks should determine where to allow drones based on the best available science
- State Parks should create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts.
- While designated areas are being determined, status quo drone use would continue (i.e. this would not ban all drone use at any time during the process)
- State Parks should include a final map(s) of designated drone take-off and landing locations on their website
- In areas that are approved for drone use, include in the rules:
- No drone take-offs or landing to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas.
- Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.
- All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time.
- State Parks should include strong enforcement mechanisms in final rules

Sincerely,

Marie Wakefield  
Newport, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Meg Ruby

**Commenter email (if provided):**

megruby@gmail.com

**Public comment:**

Drone Use in Coastal area is incompatible with OR wildlife.

Meg Ruby



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Sarah Breeze

**Commenter email (if provided):**

breeze.sarah@gmail.com

**Public comment:**

Hello,

Thank you for the opportunity to provide public comment on drone use in Oregon State Parks.

I love our public beaches and parks and feel fortunate that I've never experienced drone use while enjoying our public spaces. Drones are noisy and invasive, and have the potential to negatively impact Oregon's wildlife.

To protect the beauty, silence, and wildlife of Oregon's parks and beaches, I urge you to:

- close all state parks and beaches to drone take-off and landings, unless they can do so safely
- use best available research and science to determine where to allow drones, and consider wildlife, cultural, and recreational impacts
- accomplish this via an independent working group including all stakeholders (agency, academic, NGO, and tribal experts)
- ensure inclusion of a drone takeoff and landing ban within 100 meters of observed birds and/or known nesting locations or from seal haul out and pupping areas.
- ensure drone takeoffs and landings are discontinued in areas where repeated wildlife disturbing events occur
- periodically review areas for drone takeoff and landing given the changing nature of natural and wildlife areas
- make available on State websites maps of drone takeoff and landing sites
- include effective enforcement mechanisms in final rules

Including the above recommendations will ensure the protection of Oregon's wildlife, cultural and recreational areas for multiple generations.

Thank you for your time.

Sincerely,

Sarah Breeze



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Jean Brodahl

**Commenter email (if provided):**

brodahlj@gmail.com

**Public comment:**

Hello,

I am writing to urge you to strongly regulate drone use in our state parks, ideally to forbid their use altogether. Drones negatively impact the experience of being in Oregon's amazing natural areas, both for wildlife and for visitors who go into nature specifically to get away from intrusive technology like these.

I have been deeply upset on more than one occasion to go to a natural area that I love, only to find someone is flying a drone. This happened once at Multnomah Falls, where someone was flying a drone in front of the falls (despite clear signage that said it wasn't allowed, and he wouldn't stop flying it when I asked him to). Noisy and intrusive, drones are only enjoyable for the hobbyist who is using it, while disproportionately affecting everyone underneath it in a negative way -- this applies particularly to birds and wildlife.

I think the majority of Oregonians treasure our natural areas for their wild beauty and tranquility. It is a constant battle to maintain the beauty of these amazing places and to maintain them as sanctuaries for birds and wildlife. Thank you for continuing this work by keeping drones out.

Sincerely,  
Jean

Jean Brodahl  
Portland, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Ed Joyce

**Commenter email (if provided):**

edjoyce1590@gmail.com

**Public comment:**

Drones have research and commercial uses, but recreational drone use, often by unskilled or reckless operators, is on the increase. This can have serious impacts to wildlife, as well as other human activities, privacy, and solitude. Please limit the use of drones on Oregon beaches.

Thanks,

Ed Joyce  
Astoria, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Tamara DeRidder

**Commenter email (if provided):**

sustainabledesign@tdridder.users.panix.com

**Public comment:**

Dear OR Parks and Recreation Department, I appreciate you taking the time to received testimony on this important issue regarding the use of drones in, above, and near state parks. As an avid dog-owner I understand the importance of maintaining the integrity of the native plant and bird ecosystems. Fragile ground nesting sites are the most important areas to protect. Without my personal research on these topics I would have done much harm to these areas since little or no signage exists to educate visitors on protections that are needed, such as leashed dogs only.

The same goes for the use of drones in, over, and on state parks.

Please, close off all state parks and beaches to drone take-off and landings except where they can be safely allowed to do so. Use of drones within and over the State Parks should be based on the best available science.

Let folks like me help. Please create an independent technical working groups to determine the appropriate designated take-off, landing, and flight paths that minimize wildlife, cultural and recreational impacts.

Time of year and hours of the day also should be taken into consideration and regularly updated for accuracy. For instance blue herons are now nesting at the beginning of March. This is a bit earlier than last year due to Climate Change. Do periodic field checks to determine enforcement and accuracy of regulations, as nesting area may migrate due to rising sea levels.

Make regulations and maps readily available in paper and digital form to the general public visiting/educating themselves about the states recreational areas and parks.

Finally, please provide active enforcement through paid and volunteer staff to help maintain implementation of these regulations. Work with aviation officials to assure registration of all drones and visible license on these vehicles. Provide a pathway for citizens to submit photographs that document drone violators for follow-up penalties.

Thank you for your consideration.

Best,

Tamara DeRidder, AICP  
Portland, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Chad Hamilton

**Commenter email (if provided):**

wapaty@msn.com

**Public comment:**

Regarding proposed changes to your laws for drone pilots.

Please allow us to continue to enjoy and photograph nature with our drones in these spaces. State parks are public land, and drone pilots as members of the public, should be permitted to use them as such. Criminals do not care about what laws are in place, but we as honest law abiding citizens of the drone community do. It will only hurt us!

Closing certain areas for wildlife and crowd disturbance is a much better solution than crowding all the drones into a small area. Restricting drones to small areas in the parks actually creates dangerous situations by over crowding the airspace!

Thank you!

Chad Hamilton





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

SC Wise

**Commenter email (if provided):**

asert432@yahoo.com

**Public comment:**

Sorry to tell you this but, by Federal law and FAA rules, every citizen of the US has a public right to transit the airspace (over the continental USA and its territories). That right includes both take off and landing. Those rights are not absolute and can be restricted by the FAA. But no State, including Oregon, can claim the powers of the FAA to make or place such restrictions on a US citizen's right to transit the airspace. Should the State of Oregon create such law they will instantly create the opportunity for any citizen of the US/Oregon to sue them in Federal Civil Court.

S C Wise



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Ronald Howard

**Commenter email (if provided):**

bampsybamps@gmail.com

**Public comment:**

Dear Sirs and Madams:

I earnestly oppose the presence of drones on Oregon's coastlines and in our state parks.

As with other electronic advances of previous decades, drones will become more affordable, and their numbers will increase. I believe it is important to limit their use now, and support your efforts to do so.

Thank you,

Ronald Howard  
Cannon Beach, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Carole Cohen

**Commenter email (if provided):**

ccohen678@gmail.com

**Public comment:**

Please do not allow drones in state parks. Drones are intrusive to both animals and people. I want to enjoy my time of peace and privacy in state parks without having to deal with a drone hovering around me.

I am extremely concerned that there will be hobbyists who have little regard for wildlife and other people and will not abide by the standards.

I live on the Oregon Coast and I see people who disregard the warnings about leaving nesting birds alone, who disregard the written warning about climbing on rocks, who disregard the signs that say stay on the path to protect the natural habitat.

Again, I ask you to please not allow drones in our state parks.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Friday, March 11, 2022

## Commenter name (if provided):

Lynn Jebousek

## Commenter email (if provided):

nljebousek@gmail.com

## Public comment:

Thank you for providing this opportunity and describe any personal experiences or events I have witnessed with drones in parks or on beaches. I have had more experience with gas model planes on the beach but assume there are similar issues. They make a tremendous amount of noise and flyers have been reckless and not mindful of other beach users. People live near the beach and parks and don't want to be bombarded by the noise and falling objects on their property. I can't even imagine how disruptive this is for wildlife. Herons have fished in early morning in Big Creek by the Agate Beach Wayside park in summer. Years ago I was on the beach at 5 am and was dive bombed repeatedly by birds I assume were nesting nearby. Drones can't be good in this situation in this location. It's also a heavy pedestrian area. For these reasons I recommend all state parks and beaches be closed to drone take-off and landings except where they can be safely allowed.

- State Parks should determine where to allow drones based on the best available science
- State Parks should create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts.
- State Parks should include a final
- map(s) of designated drone take-off and landing locations on their website
- In areas that are approved for drone use, include in the rules:
  - o No drone take-offs or landing to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas.
  - o Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.
- All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time.
- State Parks should include strong enforcement mechanisms in final
- rules.

Thank you

Nyla L Jebousek  
Newport

**Note: This public comment was accidentally omitted due to human error. We apologize for the mistake.**



## Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Victoria McOmie

**Commenter email (if provided):**

honeycrisp.victoria@gmail.com

**Public comment:**

I am in favor of banning drones. I have experienced harassment by drones on myself and wildlife, especially at Roads End state park and the beach adjacent to Lincoln city.

Sincerely,

Victoria McOmie  
Lincoln City



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Aaron S

**Commenter email (if provided):**

a.w.shilkaitis@gmail.com

**Public comment:**

To whom it may concern,

I am very glad that our decision makers are addressing the new nuisance of drones in natural spaces. I cannot explain how much of a distraction from the rejuvenation of nature it is for me when I encounter a drone, and I can only imagine how much that feels invasive to wildlife, especially birds.

Please limit the use of drones as much as possible to keep our environment healthy and species who cannot advocate for themselves safe.

I understand that drones can be fun and do have useful purposes outside of recreation (which is also useful, of course), but unchecked drones create yet another destructive arm of humanity that we should be mindful of as a collective.

Thank you for your time.

Kindly,  
Aaron S  
Portland, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Alan Hardie

**Commenter email (if provided):**

marinetech\_01@live.com

**Public comment:**

I think this is an excellent opportunity to increase park attendance and enjoyment. I am a FAA part 107 cert pilot and in all the hours of flying I have under my belt I can assure you that a majority of the time people have no idea that I am overhead photographing the environment. That goes for the animals as well. I have many videos of deer, sandhill cranes, bear, etc. going about their day never noticing that I was above them. I would greatly enjoy the opportunity to document the beauty of the parks for myself and to share it with those that may be interested in visiting as well as those who are unable to visit in person. I have seen many videos from others that have made me think oh wow I want to go there and see that. The state parks belong to all the people and I see it as an opportunity for more people to enjoy the parks in their own way.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 11, 2022

**Commenter name (if provided):**

Edward Ashley

**Commenter email (if provided):**

edward.w.ashley@gmail.com

**Public comment:**

As a recreational and commercial drone pilot I would like to say that I applaud the OPRD for taking the time to listen to stake holders and recognize drones as a form of recreation while still seeking to strike a balance with man's intrusion into areas that wildlife call home.

I am also happy to see that these proposed rules remain within the legal limitations of land management and recognize that the airspace is regulated by the FAA.

While I don't like to see more and new rules and regulations generally I do appreciate the time and effort put into this one and if there must be a new rule I feel that this strikes a good balance rather than outright banning drones from the parks.





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 10, 2022

**Commenter name (if provided):**

Jerome Friesenhahn

**Commenter email (if provided):**

jeromefriesenhahn@gmail.com

**Public comment:**

The limit of the laws should within the scope of the current, and any future FAA rulings and guidelines.

Aside from a very small population of people "annoyed" by drones, this does warrant the removal of my rights to enjoy the parks, that I pay taxes and fees for, as a drone pilot.

If people are advocating to remove my rights, the burden should be on them to present empirical evidence (specific events of damage and not a mere annoyance) that drone pilots are indeed a danger to the public or the nature in and around specific areas where pilots may fly. I don't think you will find many, if any such cases.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 10, 2022

**Commenter name (if provided):**

Scott Wise

**Commenter email (if provided):**

asert432@yahoo.com

**Public comment:**

Sorry to tell you this but, by Federal law and FAA rules, every citizen of the US has a public right to transit the airspace (over the continental USA and its territories). That right includes both take off and landing. Those rights are not absolute and can be restricted by the FAA. But no State, including Oregon, can claim the powers of the FAA to make or place such restrictions on a US citizen's right to transit the airspace.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 10, 2022

**Commenter name (if provided):**

Larissa Rice

**Commenter email (if provided):**

larissa.rice.19@gmail.com

**Public comment:**

This is an incredible move on the part of Oregon state parks. Leading the way for other states and agencies!! Common sense is a wonderful thing. Drones are not "creepy," "too loud" or any of the other monkey terms thrown around by the uneducated. Birds and critters and drone can in fact coexist and it's wonderful to see Oregon state parks recognize that. Obviously boundaries near wildlife should be respected but anyone with common sense will recognize that anyway. The proposed rule is worded great just the way it is.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 10, 2022

**Commenter name (if provided):**

Royden Lepp

**Commenter email (if provided):**

royden.lepp@gmail.com

**Public comment:**

Please do not make it more difficult for drone hobbyists to recreate freely in the outdoors of one of the most beautiful states in the country. Everyone has the freedom to recreate as they please. I have people calling the cops on me because they see my drone as a threat, and yet my son has been attacked by off leash dogs in state parks twice. It's okay if you don't like my drone. I don't like your dog, let's pick opposite ends of the beach to enjoy the park.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Wednesday, March 9, 2022

**Commenter name (if provided):**

Cheryl McDowell

**Commenter email (if provided):**

cheryljmc@gmail.com

**Public comment:**

Thank you for providing this opportunity to comment on the use of drones in parks or on beaches. I am particularly concerned about drone-caused hazards to wildlife and the habitat they depend on for survival.

Please close all state parks and beaches to drone take-off and landings, except where they can be safely allowed.

State Parks should determine where to allow drones based on the best available science.

State Parks should create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts.

While designated areas are being determined, all drones should be banned from all state parks and beaches.

State Parks should include a final map(s) of designated drone take-off and landing locations on their website. In areas that are approved for drone use, the following rules should be applied:

- No drone take-offs or landing to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas.
- Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.

All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time.

State Parks should include strong enforcement mechanisms in final rules.

Sincerely,  
Cheryl J. McDowell  
Portland, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Wednesday, March 9, 2022

**Commenter name (if provided):**

Moshe Eliyahu

**Commenter email (if provided):**

mosh3d@gmail.com

**Public comment:**

Please let me continue view the wonderful nature and fly may drone in this parks.

Stat parks are public land as we all know.

Please alow me to experience nature the way I love by hiking, exsploring, taking pictures from below and above the tree line.

We also know that criminals don't really care about the laws but as a law biding citizen I really do respect the law and as such it will hurt me and the wholl drone cumunity to Express and Exercise freedom and experience with more constraining laws.

Thanks for taking the time to read my concerns.

Best regards

Moshe.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Tuesday, March 8, 2022

**Commenter name (if provided):**

Jason Haynie

**Commenter email (if provided):**

beachfishin45@gmail.com

**Public comment:**

The drone rules are fine as is, there's no need to be more restrictive.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Tuesday, March 8, 2022

**Commenter name (if provided):**

Michael Kuntz

**Commenter email (if provided):**

captain.aardvark@protonmail.com

**Public comment:**

Hi there. Drones in public parks and spaces really are a nuisance all around. It doesn't seem this is the forum to discuss an outright ban, so please restrict their use as much as is feasible. Additionally, please make it clear to the public whom we can contact for assistance with drone operators who are using drones in a dangerous manner. I haven't seen much in the way of enforcing responsible drone operations.



**Note: This public comment was accidentally omitted due to human error. We apologize for the mistake.**



## Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Tuesday, March 8, 2022

**Commenter name (if provided):**

Candive and Gregory Miller

**Commenter email (if provided):**

gandcm@gmail.com

**Public comment:**

We live in Neskowin. The stretch of beach here is divided by Neskown Creek. The side we live on is the South Beach side. We get a lot of vacationers visiting throughout the year, summertime being the busiest.

When people decide to launch their drones, it disrupts the serenity of this beach and also drives away the bald eagles that like to nest on Proposal Rock. As a volunteer with the Oregon Marine Mammal Stranding Network, we can testify that drones threaten and add undo stress on the seals and sea lions that rest on the beach. Most of these animals beach themselves because they are sick and at the end of their lives. Our experience is that drones add to the stress these sea animals have to cope with, in addition to what is already a very painful and suffering death. It leaves us helpless in our efforts and mandate to protect these animals.

We would support the State Parks banning drones from state beach parks. They are noisy, unnecessary, threaten the local wildlife, and do not fit in with this natural environment.. The State Parks need to follow the same mandate the national parks now implement.

Sincerely,

Candice & Gregory Miller



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Tuesday, March 8, 2022

**Commenter name (if provided):**

Larry Houghton

**Commenter email (if provided):**

obhunt12@gmail.com

**Public comment:**

I have read the proposed ban on drones put forth by the Portland Audubon group. I am all in favor of protecting our natural wildlife and bird species. But to propose a ban on all drone activity, with the exception of a few small locations, is just wrong. Oregon has many areas of state parks and beaches that do not have sensitive nesting sites. The State Park staff, along with the Portland Audubon group, can certainly identify specific areas that are critical. Those specific areas can then be set aside and prohibit drone flights. But taking Draconian actions to ban people flying drones legally and not endangering nesting sites, in all state parks and beaches, is an over reaction to a particular problem.

Why not follow California's model, outlined in Unmanned Aircraft System (Drones) (See [https://www.parks.ca.gov/?page\\_id=29229](https://www.parks.ca.gov/?page_id=29229) ) in State Parks, as stated below? This approach ensures the protection of wildlife while allowing the public to enjoy all the aspects of these beautiful public lands. California certainly has it's share of problems, not unlike Oregon. But they seem to have found a balance between protecting wildlife, natural and cultural resources, and the enjoyment of those parks and beaches by the public.

"Drones are currently allowed in State Parks, State Beaches, State Historic Parks, State Recreational Areas, and State Vehicular Recreation Areas except where prohibited by a District Superintendent's posted order. Posted orders may prohibit drones for numerous reasons, including: protection of threatened species; threats to cultural and natural resources; high fire danger; public safety; recreational conflicts; impacts upon visitor experience privacy; and park unit classification."

Please do not overreact to isolated problems by enforcing an all encompassing ban on Small Unmanned Aircraft Systems (Drones). Oregon's residents and visitors deserve better.

Larry Houghton



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Tuesday, March 8, 2022

**Commenter name (if provided):**

Anne Tracy Winn

**Commenter email (if provided):**

awinn@leachgarden.org

**Public comment:**

Thank you for opening this discussion up to concerned Oregonians. I have lived in Oregon all my life and treasure the beauty and peace of the wild places that we need now more than ever as the population in our state increases and more and more people are seeking out natural places for recreation and rejuvenation.

I have been startled on too many occasions by drones flying overhead and they have a strong negative impact on my experience of otherwise peaceful places. But more important than infringing on people's enjoyment, drones are hugely detrimental to the wildlife that inhabit these areas, particularly endangered bird species.

Please have an expert panel analyze and designate appropriate drone use areas that will have minimal impact on wildlife.

Plan to broadly publicize a map of accepted drone use sites.

Post clear signs and have significant fines in place to deter illegal drone use in all other areas.

All drone use areas should be subject to periodic review to ensure that wildlife are not being negatively impacted.

Thank you for considering my comments.

Sincerely,  
Anne Tracy Winn  
Portland, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Tuesday, March 8, 2022

**Commenter name (if provided):**

Sarah Erskine

**Commenter email (if provided):**

serskine@uoregon.edu

**Public comment:**

Hello,

I appreciate you accepting public comments on drone usage in our state parks. I would strongly urge you to restrict drone usage at state parks. According to the Audobon society, last year the Oregon Black Oystercatcher Project documented a rate of over three drone disturbances per week at active Black Oystercatcher nests. Wildlife already relies on small, scattered patches of undeveloped land, allowing drones makes previously safe peaceful spots no longer safe or peaceful. I also believe restricting drone usage would improve overall visitor enjoyment of parks. I have had many negative experiences at Seattle city parks in Deschutes national forest at Camp Sherman from people using drones. They are loud and obnoxious and often times I find the people who use them are not considerate in the time of day and way that they use their drones. I would hate to be trying to take photos from Cape Perpetua just to have the sound of drones around and them getting into photos. There is still plenty of public land(BLM, Forest Service) where people can use drones. Not allowing humans to use drones will not endanger the lives of humans, but drones can endanger the lives of many of the shorebirds on the coast.

Thank you for your time,

Sarah Erskine  
Graduate Student



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Tuesday, March 8, 2022

**Commenter name (if provided):**

John Garrigus

**Commenter email (if provided):**

jpggus55@gmail.com

**Public comment:**

Drones: There is no need for such devices in public places period!



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Tuesday, March 8, 2022

**Commenter name (if provided):**

Brent

**Commenter email (if provided):**

brent@sentient-robotics.com

**Public comment:**

Hi,

Please find a balance between environmental issues and drone use.

Please don't exclude drones from the majority of places but only where absolutely necessary.

Finding a healthy balance is harder than either extreme but will be better in the long run.

Thank you for your consideration,  
Brent



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Tuesday, March 8, 2022

**Commenter name (if provided):**

Timothy Sutton

**Commenter email (if provided):**

timsutton1985@gmail.com

**Public comment:**

In regards to the proposed action of legally prohibiting SUAV operations in the state of Oregon; The current language of the law allowing drones or SUAV's fly everywhere except where identified is a reasonable and acceptable compromise.

Respectfully,

Timothy Sutton



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Tuesday, March 8, 2022

**Commenter name (if provided):**

Chris Kneisley

**Commenter email (if provided):**

allusivehubby@gmail.com

**Public comment:**

The current language of letting drones fly everywhere except where identified is a reasonable and acceptable compromise. Please let us continue to view nature with our drones in these spaces. State parks are public land, allow us as the public to use them as such. Criminals do not care about the laws that are in place, but we as the honest drone community do. It will only hurt us! Thank you for your time!





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Tuesday, March 8, 2022

**Commenter name (if provided):**

Wesley Ward

**Commenter email (if provided):**

wesleytward@comcast.net

**Public comment:**

I strongly support Portland Audubon's proposed drone regulations. I don't have a personal experience at an Oregon State Park to relate, but I did watch a kite parachutist (motor driven) disturb a flock of sandhill cranes at Frenchman's Bend in Vancouver, WA. He flew over one flock and headed directly for another flock about a half mile away. I don't think he intentionally disturbed them; it was just collateral damage. That kind of disturbance of people or wildlife should not happen at a public park.

Wesley Ward  
Portland (Brooklyn)



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Tuesday, March 8, 2022

**Commenter name (if provided):**

Todd Devine

**Commenter email (if provided):**

nedsjunk@gmail.com

**Public comment:**

I have read about the proposed language change to flying a drone in Oregon State Parks. The proposed rules are intended to provide clarity for drone pilots, hobbyists and the general public to know where drone take-off and landing is allowed and prohibited within a state park and along the ocean shore. This is a great start point. I understand there are some people who want to ban drones from Oregon State Parks and that some want to change the language to ban drone take-off and landings except where they say it's ok. In the meantime, it seems all parks will be off limits. That's a ban.

I certainly do not support a ban on drone flights. As a recreational drone pilot and soon to be Part 107 certified drone pilot I believe drones are a legitimate form of recreation and belong in all State Parks. There are certainly areas we don't need to fly in. Areas such as campgrounds, crowded parking lots, and of course wildlife sensitive areas, but we should be able to enjoy our hobby outside of those areas.

Thank you for your time and consideration.

Todd Devine



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Tuesday, March 8, 2022

**Commenter name (if provided):**

Lynn Thompson

**Commenter email (if provided):**

lynnm.thom@gmail.com

**Public comment:**

Over a million seabirds and shorebirds nest along Oregon's coastline every year including the endangered Western Snowy Plover and species of concern like the Tufted Puffin and Black Oystercatcher. Based on the increased disturbance of shorebirds in Oregon due to drones, I urge you to set the following rules and policies:

All state parks and beaches be closed to drone take-off and landings except where they can be safely allowed

State Parks should determine where to allow drones based on the best available science State Parks should include a final map(s) of designated drone take-off and landing locations on their website.

In areas that are approved for drone use, include in the rules:

No drone take-offs or landing to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas.

Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.

All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time.

State Parks should include strong enforcement mechanisms in final rules.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, March 7, 2022

**Commenter name (if provided):**

Tom Walker

**Public comment:**

I support this proposed language since it allows recreational use of UAS on public lands. Closing limited certain areas for wildlife and crowd disturbance is appropriate.

A widespread banning of the use of UAS in state parks would not seem to follow the OPRD mission statement — "The mission of the Oregon Parks and Recreation Department (OPRD) is to provide and protect outstanding natural, scenic, cultural, historic and recreational sites for the enjoyment and education of present and future generations." A previous comment made note that Drone use is purely a recreational activity. This would seem to fall right within the Oregon Parks and Recreational Department mission statement. The mission statement does not include the statement of "Just for some, but not others."

Another previous comment made mention of their dislike of horse droppings on trails, but recognized that horse riders have the right to use that space also.

Many comments have been made regarding invasion privacy by drones and use of images without consent. I would then assume that these commenters do not utilize any retail or banking facilities that are under constant video surveillance.

Restricting drones to limited small areas in state parks will actually create dangerous situations by over crowding the skies in those areas. Restricting or banning of drone usage will take away the opportunity for some people to enjoy the natural beauty imagery that drones can capture.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 7, 2022

**Commenter name (if provided):**

Joseph Whelehan

**Commenter email (if provided):**

nhwhelehan@gmail.com

**Public comment:**

Oregon is an absolutely beautiful state. Many people come from all around the world to enjoy and capture via camera the natural beauty of her. A drone offers a vantage point that many would never get to see. And those vantage points can be spectacular. I believe the current language of letting drones fly everywhere except where identified is a reasonable and acceptable compromise. Many drone enthusiasts are professional pilots, certified by the FAA. We care.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, March 7, 2022

**Commenter name (if provided):**

Alex Prentiss

**Commenter email (if provided):**

alex@imcclains.com

**Public comment:**

NO! to drones in our State Parks

Thank you for requesting feedback on the use of drones on Oregon beaches and State Parks. I urge you to close all beaches and parks to the use of drones by the general public. They are noisy, they scare birds, marine animals and wildlife, and the people I have seen using them spoil the outdoor experience for everyone else visiting our state parks and beaches.

I was in a group of people watching a beautiful sunset on a quiet summer day on the beach when a group of young people put up a drone and flew it above our heads. My niece was so upset at them, she asked them - politely - to stop, explaining we were all there to enjoy this peaceful moment, and I am happy to say they did land the thing. But it was upsetting, thoughtless and so rude. We come outside to enjoy what the outdoors offers - feeling of calm, peace and renewal. People using drones ruin all of that.

If a drone is being used by scientists for their research in an approved area under strict controls to mitigate the impact on the area's wildlife, fine. But to allow the general public to fly them? No. A big NO.

If for some strange reason you feel you must open our parks and beaches to satisfy the very few inconsiderate people who want to use their playthings no matter how much they disturb and impact the experience of everyone around them, please put in strict rules about where they are flown and make sure there is a mechanism in place to enforce those rules. Then advertise where these locations are so everyone else can avoid them.

Thank you for your consideration.

Sincerely,

Alex Prentiss



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 7, 2022

**Commenter name (if provided):**

Don Maxwell

**Commenter email (if provided):**

maxwellmapping@gmail.com

**Public comment:**

Drone rules in State Parks should follow a common sense approach. Drones should be allowed in open , non-populated areas that will not impact wildlife or people visiting the parks. FAA rules already restrict flying drones over people and Oregon should not become more restrictive. Thank you

Don Maxwell, Salem



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 7, 2022

**Commenter name (if provided):**

Rocco Germani

**Commenter email (if provided):**

rocco@germanimediaproductions.com

**Public comment:**

I noticed that the state is looking at possibly changing rules to fly drones in their State Parks, and there is a local group is currently pushing hard to prohibit drones everywhere except for a few places. This is the complete flip of the current (and reasonable) of this matter, which is to allow drones everywhere except for certain areas. I think it would be incredibly detrimental if people whom have never flown drones before and have no appreciation or care for them decide to make a decision that affects those who actively participate in the drone hobby, and fly drones professionally. Listen to the pilots, let us fly.

Respectfully,  
Rocco Germani





# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Monday, March 7, 2022

## Commenter name (if provided):

Francis Rinaker

## Commenter email (if provided):

FRinaker@sorel.com

## Public comment:

- Thank you State Parks for providing this opportunity. I have been at the beach enjoying the peace and serenity of our state parks and the beautiful wildlife only to have it interrupted by the disruptive drones. I please kindly ask you the following (found on the Audubon website):
- Recommend all state parks and beaches be closed to drone take-off and landings except where they can be safely allowed
- State Parks should determine where to allow drones based on the best available science
- State Parks should create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts.
  - While designated areas are being determined, status quo drone use would continue (i.e. this would not ban all drone use at any time during the process)
- State Parks should include a final map(s) of designated drone take-off and landing locations on their website
- In areas that are approved for drone use, include in the rules:
  - No drone take-offs or landing to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas.
  - Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.
- All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time.
- State Parks should include strong enforcement mechanisms in final rules

Thank you,  
Francis Rinaker



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, March 7, 2022

**Commenter name (if provided):**

Anne Buckley

**Commenter email (if provided):**

aebuckle@gmail.com

**Public comment:**

Thank you for providing this opportunity for public comment to help inform where drone take-off and landings will be allowed within State Parks and along the OR coast. I urge OR State Parks to protect wildlife by regulating Drone use - we have a golden opportunity to help better protect nesting birds, marine mammals, and other wildlife from drone disturbances. Improper drone use is increasing and we need to be proactive to minimize wildlife disturbance balanced with appropriate drone use.

I support the following:

- Recommend all state parks and beaches be closed to drone take-off and landings except where they can be safely allowed
- State Parks should determine where to allow drones based on the best available science
- State Parks should create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts
- While designated areas are being determined, status quo drone use would continue (i.e. this would not ban all drone use at any time during the process)
- State Parks should include a final map(s) of designated drone take-off and landing locations on their website
- In areas that are approved for drone use, include in the rules:
  - o No drone take-offs or landing to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas.
  - o Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.
- All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time.
- State Parks should include strong enforcement mechanisms in final rules

Sincerely,

Anne Buckley



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 7, 2022

**Commenter name (if provided):**

James Simmons

**Commenter email (if provided):**

jamesjimmmons2001@yahoo.com

**Public comment:**

To the Oregon Parks and Recreations Regulating Committee:

I am writing this because of the disturbing trend to overturn existing laws and regulations for sUAS (aka drones) because some individuals or groups want to have life go their way for their reasons. As life evolves, and technology evolves, so does life and evolution. Life adapts and always finds a way. We have many examples of this in society today and these facts will not be argued in this email.

The current guidelines as stated by the FAA, CBO's and OPARD are sufficient to protect all areas of concern. Simply banning sUASs will not benefit anyone (including the wildlife). These same sUASs that are being targeted, are used to chart, observe and document the migrating habits of wildlife for the sole purpose of protecting them. Whoever proposed this did not think this through. We learn about wildlife from the technology we have created i.e.(duck blinds, trail cameras, etc.).

The laws (as written) are fine and sufficient to protect all interested parties and need no revisions. I am looking forward to your virtual public hearings on March 30th and the 31st.

Sincerely,  
James A Simmons



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 7, 2022

**Commenter name (if provided):**

Mark Bolles

**Commenter email (if provided):**

denver41@gmail.com

**Public comment:**

To whom it may concern,

I (we) condemn your upcoming legislative action as over-reaching & authoritarian. The current laws allow drone usage except in a few (and reasonable) areas. Proposed legislation would reverse this and exempt drone usage, except in a few areas.

Despite what you may think, most citizens are capable of making good decisions about what they do, and do not need to be babysat with prohibitive regulations, rules and new laws.

I implore you. DO NOT pass this prohibitive legislation. Instead, enforce existing law, or add prohibition to certain areas, where it makes more sense. Stopping all drone operators, based upon the actions of a few is like wiping out the city of Portland, because there were some thieves who also lived there.

--

Warm Regards,  
Mark Bolles



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 7, 2022

**Commenter name (if provided):**

Zachory Gavis

**Commenter email (if provided):**

fighters4j@gmail.com

**Public comment:**

Letting drones fly everywhere except where identified is a reasonable and acceptable compromise. Drone licensed pilots spend a lot of time and energy and money to follow FAA rules and their regulations, NTSB, and Airspace as well.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 7, 2022

**Commenter name (if provided):**

Jennifer Sofinowski

**Commenter email (if provided):**

shaw4air@gmail.com

**Public comment:**

Hello Oregon State Parks

Thank you for this opportunity to provide comment on drone use in state parks. I recommend all state parks and beaches be closed to drone take-offs and landings except where they can be safely allowed. Wildlife disturbances due to improper drone use are increasing on the Oregon coast. Last year the Oregon Black Oystercatcher Project documented a rate of over three drone disturbances per week at active Black Oystercatcher nests. Oregon's iconic coast and state parks are popular visitor destinations. As visitation increases we need to be proactive to minimize wildlife disturbance balanced with appropriate drone use.

State Parks should:

- State Parks should determine where to allow drones based on the best available science
  - State Parks should create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts.
    - While designated areas are being determined, status quo drone use would continue (i.e. this would not ban all drone use at any time during the process)
  - State Parks should include a final map(s) of designated drone take-off and landing locations on their website
  - In areas that are approved for drone use, include in the rules:
    - No drone take-offs or landing to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas.
    - Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.
  - All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time.
  - State Parks should include strong enforcement mechanisms in final rules
- Thank you for taking the time to review my recommendations.

Respectfully-

Jennifer Sofinowski



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 7, 2022

**Commenter name (if provided):**

Jeff Buckingham

**Commenter email (if provided):**

buckin@gmail.com

**Public comment:**

Please restrict drone use in state parks along the ocean shore. Drones affect bird populations negatively. I do not support the further disruption to nesting birds. Also, drones are a noise and sight nuisance to many people that want to enjoy the park without human impact.

Thank you,

Jeff Buckingham



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 7, 2022

**Commenter name (if provided):**

Brian West

**Commenter email (if provided):**

bwest7599@gmail.com

**Public comment:**

Drone haters,

Your current efforts to prohibit drone use in your state parks is a detriment to the exercise of FAA granted drone use. Part 107 pilots have passed rigorous testing & have proven that they can use drones in a responsible manner. Your unwarranted restrictions serve no purpose in protecting wildlife. Your group is merely wanting to flex some legislative muscle to grab power where you can.  
Brian West





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 7, 2022

**Commenter name (if provided):**

Don Haga

**Commenter email (if provided):**

douwe@comcast.net

**Public comment:**

Hello, I would like to request that you exclude from the definition of "drone" unpowered gliders or aircraft. We make effort to travel to the Oregon coast at least once a year so I can participate in a Slope Soaring event. Our gliders are unpowered and can only be flown in limited locations where the geography and wind patterns are conducive to flight. Powered drones can fly anywhere and gliders should not be in that category.

Thank you for your consideration.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Commenter name (if provided):**

Barry Pendley

**Public comment:**

This language is fair and a good compromise

**Date comment received:**

Monday, March 7, 2022

**Commenter email (if provided):**

barry@evmikna.com



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 7, 2022

**Commenter name (if provided):**

Robert Heap

**Commenter email (if provided):**

heap\_r@hotmail.com

**Public comment:**

I believe this rule unintentionally uses the blanket definition of "Drone" to also restrict hobbyist remote controlled sailplanes and gliders without propulsion systems.

Such sailplanes and gliders have a long-established history of safely flying along coastal regions and other geological features in state parks in a practice known as "slope soaring", or using the rising wind along a hillside to provide lift to remain aloft. These R/G gliders do not carry cameras or video equipment and have no spinning propeller to make nuisance noise or be a risk to spectators.

I am a life-long recreational R/C pilot and enjoys slope soaring along the Oregon coast, particularly at Cape Blanco and Cape Ferrello. To see restriction of my hobby through clumsy implementation of the ORS 837.300(4) language would be a tragedy.

Previous comments filed by Patrick Chenwing on Feb 26 and Feb 28, 2022 would provide a much more elegant solution that addresses the primary concerns of this proposed rulemaking without undue burden on other recreational visitors.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 7, 2022

**Commenter name (if provided):**

Logan Seven

**Commenter email (if provided):**

loganseven007@gmail.com

**Public comment:**

As a drone pilot, we work very hard to be certified to fly our drones. We are under very strict guidelines from the FAA! The current language of letting drones fly everywhere except where identified is a reasonable and acceptable compromise.

Logan Seven



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 7, 2022

**Commenter name (if provided):**

Alyson Berman

**Commenter email (if provided):**

emmash@gmail.com

**Public comment:**

Dear State Parks,

Thank you for giving this opportunity for the public to weigh in on drones in State Parks and on our beaches. I am writing to ask that you close both state parks and all beaches to drone take-offs and landings except where can safely be allowed using the best possible science.

I have personally witnessed drones disrupted nesting birds. With sensitive species like the Black Oystercatcher, Western Snowy Plover, and Tufted Puffin, it is imperative that we take action to protect these species from disturbances. Especially disturbances that can reach them no matter where they move to.

I stand with Portland Audubon in recommending the following:

- State Parks should create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts.
- State Parks should include a final map(s) of designated drone take-off and landing locations on their website.

In areas that are approved for drone use, include in the rules:

- No drone take-offs or landing to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas.
- Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.
- All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time.
- State Parks should include strong enforcement mechanisms in final rules

Thank you for accepting my comments.

Best,

Alyson Berman, Portland, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, March 7, 2022

**Commenter name (if provided):**

Bryan Brock

**Commenter email (if provided):**

bryanabrock@gmail.com

**Public comment:**

Thank you for providing this opportunity for feedback from the public regarding drone use at state parks. I never enjoy seeing drones in a park when I'm there enjoying nature and watching birds and other wildlife. I hope we can consider closing all state parks and beaches to drone take-off and landings except where they can be safely allowed.

I think State Parks should determine where to allow drones based on the best available science by creating an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts. It seems that while designated areas are being determined, status quo drone use could continue as current. I suggest that State Parks include final maps of designated drone take-off and landing locations in each park on their website for public reference. In areas that are approved for drone use, please consider including in the rules:

- No drone take-offs or landing within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas.
- Previously approved drone take-off and landing locations with repeated wildlife disturbance events occurring should be discontinued.

I suggest that all areas are periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time. In order for the best outcomes for wildlife and those people in the parks to enjoy it, State Parks should include strong enforcement mechanisms in final rules.

Sincerely, Bryan Brock, PharmD



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Monday, March 7, 2022

## Commenter name (if provided):

Teresa Mcgrath

## Commenter email (if provided):

bone1953@msn.com

## Public comment:

Talking Points

- Thank State Parks for providing this opportunity and describe any personal experiences or events you have witnessed with drones in parks or on beaches
- Recommend all state parks and beaches be closed to drone take-off and landings except where they can be safely allowed
- State Parks should determine where to allow drones based on the best available science
- State Parks should create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts.
  - o While designated areas are being determined, status quo drone use would continue (i.e. this would not ban all drone use at any time during the process)
- State Parks should include a final map(s) of designated drone take-off and landing locations on their website
- In areas that are approved for drone use, include in the rules:
  - o No drone take-offs or landing to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas.
  - o Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.
- All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time.
- State Parks should include strong enforcement mechanisms in final rules



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 7, 2022

**Commenter name (if provided):**

Deborah Merchant

**Commenter email (if provided):**

dmerchant@me.com

**Public comment:**

Dear OPRD,

Thank you for the opportunity to provide comment on this major league problem for both people and wildlife.

Last summer while walking the Trail of Ten Falls at Silver Falls State Park, I came across a couple at Lower North Falls who were flying a drone from the trail down to the creek; and then jumping down the hill to get the drone out of the creek; and then clambering up the hill...for which there is no trail! The vegetation was completely torn apart due to the soft soil. When I asked if they had investigated if drones were allowed, they both got very angry and yelled at me for standing quietly on the trail to take still photos from a stationary tripod. They disturbed the American Dipper that was trying to feed, and yet they claimed to not see wildlife. When I returned to the parking area, I asked the rangers about drones and learned that - in that particular part of the park - drones are not allowed. However, one would never know! I looked for signs in the park, and I tried to find information online and was unsuccessful. Even in the areas where drones are allowed, they disturb family picnic gatherings where people want to relax and talk...the drone takes precedence.

On another trip to Trillium Lake on US Forest Service land, I witnessed a Great Blue Heron, attempting to feed, that was terribly disturbed by a drone and in short order it flew off, which we all know is detrimental to its survival.

I am asking OPRD to permanently eliminate the use of drones in all state parks and beaches for recreational purposes. Knowing 'who lives here' (any given natural space) where all forms of life have been documented, even if only through observation, should lead to a clear understanding of just how harmful drones can be. I am asking OPRD to create an independent technical working group that includes Tribes, NGOs, academia, government agencies and community scientists to provide evidence for why recreational drones should not be allowed in Oregon's State Parks.

Until that time comes, please update OPRD's website on the homepage! Install BIG signs at the entrance to every park and the parking permit machine, and at each and every trail entrance. In addition, where park staff take parking fees, ask them to inform visitors that drones are not allowed except in the areas marked on the map they receive.

With appreciation and gratitude for Oregon's amazing parks!



Deb Merchant  
Albany, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 7, 2022

**Commenter name (if provided):**

Lisa Hogan

**Commenter email (if provided):**

lisa.hgn@gmail.com

**Public comment:**

Hi there- I wanted to send a quick comment and express my opposition to drone use in state parks- they are disruptive and hazardous to wildlife, as well as obnoxious to bystanders. I recognize that drone users feel that they should have a seat at the table: perhaps one or two parks could be designated as drone-friendly, while the rest could be left as they are meant to be- opportunities for Oregonians to be a part of nature.

Thank you!  
Lisa Hogan



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, March 7, 2022

**Commenter name (if provided):**

Kammy Kern-Korot

**Commenter email (if provided):**

kammymatt@aol.com

**Public comment:**

To whom it may concern,

I'm writing to comment on drone use and beaches in Oregon. I ask that you close state parks and beaches to drone take-off and landings except where they can be safely allowed and base decisions re: drone use on the best available science. Please create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts.

In areas that are approved for drone use, no drone take-offs or landing should occur within 100m of any observed birds, known nesting locations or from seal haul out and pupping areas. Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location. All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time.

State Parks should include strong enforcement mechanisms in final rules and include a final map(s) of designated drone take-off and landing locations on your website.

Thank you for the opportunity to comment.

Kammy Kern-Korot  
Oregon resident



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, March 7, 2022

**Commenter email (if provided):**

shelbycj@aol.com

**Public comment:**

Thank you for the opportunity to comment on the proposed No Drone Zones rules. I have been a private pilot, single engine land, my whole adult life. Pilots are used to minimums; including minimum altitudes, minimum clearances over obstructions, etc. Pilots are used to seeing restricted areas on sectional charts. When the drone phenomenon took off, I was appalled at how intrusive these devices were allowed to become. So, it is reasonable to establish restrictions on the use of drones, and those restrictions should include flying over private property, and in wilderness areas. For those involved in legitimate research, special permits could be issued. Thank you.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, March 7, 2022

**Commenter name (if provided):**

Kimber Nelson

**Commenter email (if provided):**

kimber\_nelson@hotmail.com

**Public comment:**

As an Oregonian who loves our State Parks and believes they are and should be crucial homes for animals, I am glad to comment on the use of drones in State Parks. I recommend all state parks and beaches be closed to drone take-off and landings except where they can be safely allowed

To determine exceptions of where drones are allowed, State Parks should use the best available science and create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts. State Parks should provide a final map(s) of designated drone take-off and landing locations on their website

In areas that are approved for drone use, include in the rules:

- No drone take-offs or landing to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas.
- Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.

All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time. State Parks should include strong enforcement mechanisms in final rules to ensure these efforts are meaningful.

Thank you  
Kimber Nelson  
Portland, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 7, 2022

**Commenter name (if provided):**

Marti Gerdes

**Commenter email (if provided):**

martigerdes@gmail.com

**Public comment:**

Dear OPRD,

I welcome any efforts OPRD can make to limit -- or better yet, eliminate -- use of drones in and near recreation sites. I've had them hover over me many times while hiking or kayaking, and their noise and intrusiveness does not belong in outdoor areas people seek peace, quiet and privacy.

I support any and all efforts by OPRD to implement "no drone zones" in ALL public recreation spaces, not just near nesting wildlife.

Sincerely,  
Marti Gerdes  
Eugene, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 7, 2022

**Commenter name (if provided):**

Kerry Loehr

**Commenter email (if provided):**

kerryloehr@hotmail.com

**Public comment:**

OPDR,

As a climber I have a strong opinion that drones at Smith Rock State Park are super unsafe. It's not just about take off and landing zones...drone pilots fly them way too close to lead climbers. It is not safe, period. It's only a matter of time until climbers are injured or die as a direct result of a drone flying too close (ex. especially a trad climber where the protection is not as certain as bolted sport routes). I have personally been buzzed by them while climbing at Smith. Until, and unless, something is done you can expect more confrontations, and escalation between groups. Inaction on your part translates to culpability. Good luck with future lawsuits.

Kerry Loehr



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 7, 2022

**Commenter name (if provided):**

Shannon DeJean

**Commenter email (if provided):**

sdejean11@gmail.com

**Public comment:**

I am writing to request restrictions for use of drones at state parks unless in safe take off and landing places. I am in support of the recommendations that all state parks and beaches be closed to drone take-off and landings except where they can be safely allowed. I support the safety of wildlife and natural and natural areas





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 7, 2022

**Commenter name (if provided):**

Ann Brodie

**Commenter email (if provided):**

annbrodie143@comcast.net

**Public comment:**

I support the proposal that the State Parks set up an independent group to regulate the drone use on Oregon beaches. The rules should be clearly posted and enforced to protect nesting birds and other creatures.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, March 7, 2022

**Commenter name (if provided):**

Diane Rios

**Commenter email (if provided):**

dirios@comcast.net

**Public comment:**

Hello,

I am long time Oregonian who has spent many years working to protect our incredible and irreplaceable natural resources. I fully support careful, thoughtful drone restrictions so as not to mar or destroy the beauty and wonder of the very delicate ecosystem along our coasts and coastal forests and streams. They have for too long been poisoned by rampant development, over-logging and chemicals used on clear cuts. It's so much easier to protect them rather than correct them later after the damage has been done. Protecting them also sends a strong message to the next generation that we value these things and they should too. With that in mind I am also writing to strongly encourage laws to be passed prohibiting the use of cars on beaches. I am handicapped myself so I totally understand the desire for beach access, but allowing cars and trucks (except for emergency responders naturally) to drive on our beaches contradicts the very essence of nature enjoyment, protection and conservation. I personally go to the beach to get away from cars, to enjoy the sounds of the wild, the wind, the waves...to feel that deep, peaceful relaxation you can't get anywhere else, to know you are part of it all - part of nature. When I go to a place like Cannon Beach I am horrified to see car after car driving right down the sand - endangering wildlife, polluting the earth and water with exhaust, oil and noise, not to mention the very real possibility of getting run over. It makes absolutely no sense to allow this. Instead, why don't we design simple, safe boardwalks that reach down to the water, or even a paved trail that wheelchairs can navigate? I would pay extra taxes for this kind of thoughtful and educational solution.

Thank you!

Diane Rios

Portland, OR.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 7, 2022

**Commenter name (if provided):**

Laura Tucci

**Commenter email (if provided):**

thehawkeyes@gmail.com

**Public comment:**

Thank you for accepting public comments regarding drone use within Oregon's majestic parks and coastline.

I am still disturbed by what I witnessed last year at a turnout of Route 101 just south of Seal Rock State Recreation Site. I was having lunch and birdwatching with my binoculars. A group of four men arrived and proceeded to fly a drone over the rocky cliffs. Two Black Oystercatchers aggressively followed and attempted to drive-bomb the drone repeatedly. The Oystercatchers were likely nesting on the rocks below. They clearly recognized it as a threat and cried out making quite a racket while chasing the drone. This went on for some time, and since I was there alone, I was not comfortable approaching a group of men to ask them to stop.

Please make all state parks and beaches closed to drone take-off and landings except where they can be safely allowed. I encourage State Parks to determine where to allow drones based on the best available science. Please review all areas periodically for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time.

Please provide education sources to inform the public on the dangers drones can cause to wildlife.

Sincerely,  
Laura Tucci  
Eugene, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 7, 2022

**Commenter name (if provided):**

Ann Tiedeman

**Commenter email (if provided):**

tiedemanpdx@yahoo.com

**Public comment:**

Hello,

Thank you for taking input on this important issue. Here are some thoughts.

State Parks should determine where to allow drones based on the best available science. To accomplish that, State Parks should create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts

State Parks should include a final map(s) of designated drone take-off and landing locations on their website. These areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time.

State Parks should include strong enforcement mechanisms in final rules since you know rules will be broken.

~~~~~

Ann Tiedeman



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Monday, March 7, 2022

## Commenter name (if provided):

Quinn LaMunyon

## Commenter email (if provided):

shawnlamunyon@gmail.com

## Public comment:

Hello!

I would like to thank you for your time and the wonderful job you do with Oregon's amazing state parks. I use these parks multiple times every week. I volunteer and help keep them awesome in every way I can.

Drones have become a nuisance to people trying to enjoy them. I have hiked into trails with my wife to have a romantic sunset and been interrupted by the incredibly loud and invasive buzz of the drones. I have shooed them away only to be buzzed closer and even had to duck to avoid being hit by them. So many times. Several different times, I have experienced aggressive behavior when signaling the drones that they are being intrusive. Very rarely do the operators respect your wishes. I would never treat a fellow park user in such an invasive manner.

One time my son(3 years old at the time) and some of his friends. Some of the children were in their shorts and another was in her birthday suit. A drone kept flying around them and obviously filming them. Is parents kept shooing them away. The male operated was up on the pull-out of the S curves in Cannon Beach over looking Haystack rock. We finally figured out where the operated was and one of the children's mothers went to ask the man to stop. He noticed us pointing at him and her walking up the stairs toward him. He retrieved his drone and disappeared into a vehicle and took off. Really creepy.

Then there are the birds and wildlife.

A couple different times I've seen drones approaching haystack rock and causing all the birds to get upset , screech and fly erratically off the rock. One time a person was actually trying to chase the birds around. I was surfing and couldn't get out of the water before the operated stopped.

Around the corner of Chapman Point there is a bald eagle nest. I've witnessed drones flying 10' from it frightening juvenile eagles.

People should be respectful of nature and other users of parks. There is nothing worse than trying to relax and breathe in the fresh air when alls you can hear is the high pitched annoying buzz of a man made drone. These people literally are missing the forest and the trees.

Please regulate the use of these machines.

Thank you for all you do and keep up the hard work. It is appreciated.

-Quinn Shawn LaMunyon

Cannon Beach, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, March 7, 2022

**Commenter name (if provided):**

Sarah Ryan-Knox

**Commenter email (if provided):**

mssarahryan@gmail.com

**Public comment:**

To Whom It May Concern:

Thank you for providing this opportunity to provide comments to help inform where drone take-off and landings will be allowed within State Parks and along the ocean shore. I request that all state parks and beaches be closed to drone take-off and landings except where they can be safely allowed.

- State Parks should determine where to allow drones based on the best available science
- State Parks should create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts
  - o While designated areas are being determined, status quo drone use would continue (i.e. this would not ban all drone use at any time during the process)
- State Parks should include a final map(s) of designated drone take-off and landing locations on their website
- In areas that are approved for drone use, include in the rules:
  - o No drone take-offs or landing to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas.
  - o Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.
- All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time.
- State Parks should include strong enforcement mechanisms in final rules

Thank you for your consideration.

For the wild,

Sarah Ryan-Knox  
Portland, OR 97206



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, March 7, 2022

**Commenter name (if provided):**

Steve Reed

**Public comment:**

Please do not allow drones to "buzz" around our Public areas. We do not want to see them; we do not want to hear them; we do not want them disturbing wildlife or buzzing around birds nests or peeking into bear dens. We must realize that the future holds the possibility of these drones becoming as wide spread as automobiles----- get rid of them NOW

Steve Reed, Salem oregon



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, March 7, 2022

**Commenter name (if provided):**

Jean Clancey

**Commenter email (if provided):**

clanceyhome@pacinfo.com

**Public comment:**

As an equestrian who trail rides on open lands, I am writing in support restricting the use of drones on or near Oregon's public lands. Horses and riders are defenseless against the sudden noise and appearance of overhead drones, and real danger and injury are very likely to occur. A bill to ban drone operators from launching and landing where the public, especially equestrians, are present is imperative. Such legislation could help diminish the potential for tragic consequences. The activity of a small user group cannot be allowed to destroy outdoor values and safety for the vast majority of users of Oregon's state parks and public reserves.

Thank you, Jean Clancey

Member Southern Willamette Forest Collaborative & Emerald Empire Chapter Back Country Horsemen of Oregon





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 7, 2022

**Commenter name (if provided):**

Karen Sjogren

**Commenter email (if provided):**

sjogrenkaren2@gmail.com

**Public comment:**

I'm a birdwatcher and former OPRD employee. Thank you for taking up this important issue. Drones should be prohibited in all state parks and along the adjacent shoreline. Drones should also be prohibited near any shorebird nesting area, or where marine mammals are found. Drone use is definitely harassment of wildlife. In my own experience, I saw a bald eagle in flight try to attack a nearby drone at a city park. Obviously it was confused and eventually was scared out of the area. If a bald eagle is upset by a drone, I can only imagine the effect on nesting shorebirds. Please enact a strong law that includes money for signage



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, March 7, 2022

**Commenter name (if provided):**

Barbara Davis

**Commenter email (if provided):**

jibdavis@peak.org

**Public comment:**

From a purely economic standpoint, outdoor tourism is a huge industry in Oregon employing many people. People come to Oregon for it's unique, outstanding natural areas and should be allowed to enjoy our rapidly diminishing forests, rivers, and uncluttered, unmechanized beaches without the encroachment of drones. But even more important the birds, having fewer nesting locations left as beachfront development marches on, unencumbered need to not be disturbed by the whirring, buzzing, intrusiveness of drones.

I believe that the following should be a minimum for protecting wildlife.

- In areas that are approved for drone use, include in the rules:
  - o No drone take-offs or landing to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas.
  - o Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.

Please protect what is left of nature.

Thank you,

Barbara Davis



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, March 7, 2022

**Commenter name (if provided):**

Stephanie Wiarda

**Commenter email (if provided):**

swiarda@gmail.com

**Public comment:**

Please keep our state parks/beaches safe for our birds:

- Recommend all state parks and beaches be CLOSED to drone take-off and landings except where they can be safely allowed
- State Parks should determine where to allow drones based on the best available science
- State Parks should create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts.
- While designated areas are being determined, status quo drone use would continue (i.e. this would not ban all drone use at any time during the process)
- State Parks should include a final map(s) of designated drone take-off and landing locations on their website
- In areas that are approved for drone use, include in the rules:
- No drone take-offs or landing to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas.
- Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.
- All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time.
- State Parks should include strong enforcement mechanisms in final rules

Stephanie Wiarda, Portland OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 7, 2022

**Commenter name (if provided):**

Craig Hills

**Commenter email (if provided):**

chills@gmail.com

**Public comment:**

The proposed changes to this rule make things much clearer and would be a great compromise. As a visitor, I could easily plan ahead where I could safely fly a drone without bothering local wildlife. In addition, the proposed changes would not be overly burdensome to comply with.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 7, 2022

**Commenter name (if provided):**

Todd Skougor

**Commenter email (if provided):**

skougor@gmail.com

**Public comment:**

A balance must be created. Drones should be prohibited in sensitive or controlled areas, and should follow FAA guidelines otherwise. A blanket ban, or restriction unless permitted is wasteful and completely unnecessary.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, March 7, 2022

**Commenter name (if provided):**

Aaron Nelson

**Commenter email (if provided):**

aaron@aairsimage.com

**Public comment:**

Hello, Oregon provides a vast area of beautiful space all over and especially in its state parks. Professional and respectful operators of Drones want to share this with others and experience it in ways possible today that weren't before. By having rules to help guide operators in safe enjoyment of the sky's above the parks can make it more enjoyable for everyone. Drones are very safe and when people work together they can be even safer. Drones are here to stay please work together to free up the sky... it is so lovely up there... and you will have way more visitors as a result providing a boost to state park funds. I know I would take part for sure if it was allowed. Thank you!!!



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Sunday, March 6, 2022

**Commenter name (if provided):**

Ramon Aguirre

**Commenter email (if provided):**

Ramon@AguirreTech.com

**Public comment:**

As a commercial drone pilot, I welcome the park authorities desire to make rules and regulators that allow for the use of drones in a safe manner.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Sunday, March 6, 2022

**Commenter name (if provided):**

David Lide

**Commenter email (if provided):**

david.lide@arkansasaviation.com

**Public comment:**

The new language is a perfect compromise and there will be systems in place to protect birds and people from drones.





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Sunday, March 6, 2022

**Commenter name (if provided):**

Nick Smith

**Commenter email (if provided):**

nickster3074@gmail.com

**Public comment:**

The new language is a well thought out, planned, and organized and is a perfect compromise. I also like that that there will be systems in place to protect birds and people from drones.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Sunday, March 6, 2022

**Commenter name (if provided):**

Michael Gans

**Commenter email (if provided):**

mikegans492@gmail.com

**Public comment:**

The majority of drone pilots are registered with and/or licensed by the FAA. They tend to very responsible individuals who don't want to injure people or wildlife let alone damage a drone which thousands of dollars. Additional rules and regulations are not needed.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Sunday, March 6, 2022

## Public comment:

It would really help to have written rules posted online and at public areas where the take-off and landing of drones need to be prohibited. The rules need to be posted on easy to read signs, in multiple languages, in areas that people set their drones up for take-off and landing. There is clear evidence that drones cause problems for endangered wildlife species, especially on the Oregon Coast.

There is danger for people as well. If a drone hits a person, or causes them to become injured in any way, it is difficult to find out who put that drone in the air. Drone flyers need to have consequences for their actions. If it is possible, rules need to be written not only for where drones take-off and land, but the areas in which they are and are not allowed to actually fly.

It would be beneficial to have areas posted where take-off and landing of drones are allowed along with where they are not allowed. There needs to be constructive guidelines so that people who want to fly drones will know exactly where it is okay to fly them.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Sunday, March 6, 2022

**Commenter name (if provided):**

Donald Hudson

**Commenter email (if provided):**

photoman4@comcast.net

**Public comment:**

I feel like these new drone rules are a great compromise for everyone including animals and wildlife. Thank you for considering the drone community too.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Sunday, March 6, 2022

**Commenter name (if provided):**

Mike McAbee

**Commenter email (if provided):**

mike.mcabee@gmail.com

**Public comment:**

As a certified drone pilot and recreational user of public lands throughout the country, I encourage Oregon to leave the wording of park drone rules as is. The nature of laws in the United States is to default to freedom and the least restrictive guidelines for any situation. Only where a specific law, restricting overall freedom, will benefit the entire population are restrictions justified. This is not one of those cases. Thank you!



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Sunday, March 6, 2022

**Commenter name (if provided):**

Michael Hall

**Commenter email (if provided):**

michael@lgeo.us

**Public comment:**

The current rules are perfectly fine and better help protect wildlife and citizens.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Sunday, March 6, 2022

**Commenter name (if provided):**

Will Erickson

**Commenter email (if provided):**

willerickson@earthlink.net

**Public comment:**

Hi, I think that drones should be allowed as the current situation allows. They are a great way to capture the beauty of Oregon State parks, and should be allowed.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Sunday, March 6, 2022

**Commenter name (if provided):**

Anthony Million

**Commenter email (if provided):**

anthonymillion2005@gmail.com

**Public comment:**

This proposal is the perfect compromise especially since I have my Part 107 and fly commercially full-time.





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Sunday, March 6, 2022

**Commenter name (if provided):**

Jonathon Cortez

**Commenter email (if provided):**

jon@tsunamiairdrone.com

**Public comment:**

The language of the new rule is better than the existing rule.

Drone manufacturers and pilots will have systems and standard practices to protect wildlife.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Sunday, March 6, 2022

**Public comment:**

Funny how a great many comments offer up that drones are noisy and a danger to raptors. Obviously the commenters aren't familiar with reality. Noise is calculated in decibels. Drones are exceedingly less decibels than motorcycles, lawn mowers and even beat out larger trucks like garbage trucks. Has OPRD banned those noisy vehicles??? Likewise, there hasn't yet been an incident of a raptor being killed or injured due to a drone, nor has there been evidence of nests vacated by raptors due to general drone usage. You may now discount all of those false claims.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 4, 2022

**Commenter name (if provided):**

Ralph M.

**Commenter email (if provided):**

ralph.maz1@outlook.com

**Public comment:**

All drones should be banned at OR state parks and along the coast. They are annoying, dangerous and a complete invasion of privacy among other issues. Please ban them.  
Thank you.

Ralph (Cannon Beach)



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 4, 2022

**Commenter name (if provided):**

Monte Westerfield

**Commenter email (if provided):**

monte@uoregon.edu

**Public comment:**

I am writing in support on a ban of all drone take-offs and landings on all Oregon public lands. I understand that the state has no jurisdiction over the air, but by eliminating the ability to launch drones on public land you may be able to limit the number of drones flying over our precious places that must be protected for the sake of wildlife and the enjoyment of the public.

Thank you for your consideration.

Monte Westerfield  
Eugene, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Friday, March 4, 2022

**Commenter name (if provided):**

Amy Dessert

**Public comment:**

Drones can be effectively used for scientific data collection. I am not opposed to that use of drones. But state parks are some of the few places where I go to enjoy relatively unspoiled nature. I have had the unpleasant experience of hiking near the irritating whine of someone's low-flying drone, and I have seen drones flying around near a cliff where hawks were perched. I am sure some drone operators fly them responsibly, but far too many operators are oblivious to the disturbance to wildlife their drones cause or even excited to try to get an animal to react. I am opposed to allowing take-off and landing of drones in state parks.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 4, 2022

**Commenter name (if provided):**

Lorelei Jossart

**Commenter email (if provided):**

loreleiwildcatphotography@gmail.com

**Public comment:**

How about just no drones at all? We got along for a lot of years without them.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Friday, March 4, 2022

## Commenter name (if provided):

Patrick Chewning

## Commenter email (if provided):

pchewn@comcast.net

## Public comment:

Rule language clarification may be needed in several places. A lawyer or professional rule-maker might be needed to get the wording correct.

WAS: "Takeoff and Landing"

IS: "Takeoff or Landing"

Consider the case where a person takes off outside of the park, but lands inside the park. They have broken the rule for "Takeoff or Landing" but have not broken the rule for "Takeoff and Landing".

I'm sure you do not want to limit the regulations to events where both the takeoff and the landing occur in the park.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 4, 2022

**Commenter name (if provided):**

Omni

**Commenter email (if provided):**

omnimountainskyrainbow@gmail.com

**Public comment:**

How about instead, designated places where drones can be, since they are a nuisance. Give them special fields or parks. Prohibit them everywhere else.

I already know women who have been peeped at by drones.

Isn't it ironic that even as the bird populations are crashing, artificial birds, with annoying sounds and invasive capabilities are replacing them? How sad.

Omni





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 4, 2022

**Commenter name (if provided):**

Darko Sojak

**Commenter email (if provided):**

darchey@comcast.net

**Public comment:**

Please, "no drone zones" near nesting wildlife and recreational sites.

Thank you,  
Darko Sojak  
Eugene, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 4, 2022

**Commenter name (if provided):**

Steve Northrop

**Commenter email (if provided):**

stenor@aol.com

**Public comment:**

If I had my way, drones would not be flying in state parks - they ruin the experience. So I support a no drone zone in all Oregon state parks.

Steve Northrop



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 4, 2022

**Commenter name (if provided):**

Patrick Chewning

**Commenter email (if provided):**

pchewn@comcast.net

**Public comment:**

I propose that the wording of the rule should be changed as follows (occurs in several places):

WAS: "Takeoff and Landing"

IS: "Takeoff or Landing"

I'm pretty sure the intent is to regulate each of two separate activities: "Takeoffs" or "Landings".

I'm pretty sure the intent is not to regulate the combination of two events: "Takeoff and Landing"



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Friday, March 4, 2022

**Commenter name (if provided):**

B Williams

**Public comment:**

Thank you for allowing the opportunity to comment on the draft rules regarding drone take-off and landing on State Park lands. I understand that when used responsibly, drones can be an enjoyable way for some users to enjoy our natural spaces, and I believe drone operators deserve to have a place to fly safely and without negatively impacting others. However, from my experience it appears that a very small percentage of drone pilots actually know, understand, and follow the rules. To sum up what I have seen, drone use usually benefits a single person while disrupting the overall experience of numerous other park visitors. Drones can and do invade other users' personal space and are noisy in places where solitude, quiet, and privacy are desired.

I live on the Oregon coast, spend time on the beach several days per week, and personally see examples of irresponsible and illegal drone use on a fairly regular basis during the seabird nesting season. My wife and I volunteer as monitors for nests of Black Oystercatcher (a species of concern) and have witnessed firsthand how territorial Oystercatchers are towards drones, chasing any drones that are within hundreds of yards and leaving nests with eggs and/or chicks unguarded against ever-present aerial predators for significant periods of time. The unfortunate reality is that many drone pilots on the coast are irresponsible and ill-informed about Federal regulations regarding the harassment of wildlife.

I would suggest banning drone use on ocean shores from Mar 15 through Sept 1 to avoid conflicts with nesting seabirds, as recommended by the US Fish & Wildlife Service in this article about the effects of drones on nesting seabirds - <https://medium.com/usfwspacificnw/drone-use-putting-pressure-on-nesting-seabirds-on-oregon-coast-b77241ca73ec> To protect the rights of the majority of park visitors who are not there to operate a drone, I believe the default should be for park areas or beaches to be closed to drone take off and landings unless otherwise allowed. This would align more closely with US Fish & Wildlife policy and thus create similar expectations for drone users.

In addition, I believe drone operators should be required to obtain and pay for permits to operate in State Parks and on ocean shores. In addition to allowing monitoring of drone usage in their area of purview, requiring permits would provide revenue to OPRD, an organization which doesn't have the funding to finance "drone police". Enforcement will always be a thorny issue with drones because drone operators engaged in irresponsible/illegal activities can be difficult to locate. However, requiring all drone operators who wish to launch and land within State Parks and other public areas of the coast to register and invest financially would help to curtail irresponsible/illegal drone operations. All drone operators flying for commercial purposes should be subject to a

standardized, fee-based special use permitting process. Strong enforcement mechanisms should be part of the rules.

Drones should not be allowed in any crowded areas including but not limited to, parking lots, campgrounds, popular beaches and rock-climbing spots, etc., to ensure the safety of the public.

As currently written in section "OAR 736-010-0040 Visitor Conduct (9) (f)", and "OAR 736-021-0100 Visitor Conduct (5) (g)", the rules say "Proposed zones will be posted on the department website", language which is much too vague. To make it as convenient as possible for drone operators to know where it is legal to fly, I would strongly recommend to have all State Park prohibited areas available on a single interactive GIS-based map on a highly visible web page somewhere on OPRD's state-level website (for example, under the "Plans, Rules, Permits" section). This map would provide "one stop shopping" where drone users could zoom and pan to their area(s) of interest. All too often when I have talked directly with drone operators who are flying illegally (usually harassing Black Oystercatchers), their response is "I didn't know". Ignorance of the law is never a valid excuse, which means education of the average drone user is going to be extremely critical to the success of OPRD's implementation of the new rules. Along these same lines, Oregon's drone rules need to be somehow integrated with the FAA's regulations, perhaps by offering links to the FAA regulations on the same OPRD website as the map.

State Parks should create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts using the best available science.

Interestingly, Washington State allows drones in State Parks by permit only - <https://www.parks.wa.gov/1080/Remote-Controlled-Aircraft>



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Friday, March 4, 2022

**Commenter name (if provided):**

Tammy Spencer

**Commenter email (if provided):**

tammy\_spencer@icloud.com

**Public comment:**

Greetings,

I understand Oregon State Parks is accepting public comments to help inform where drone take-off and landings will be allowed within State Parks and along the ocean shore. Thank you for providing this opportunity. This is a such great time to help better protect nesting birds, marine mammals, and other wildlife from drone disturbances. Want to share my own experience. While visiting Jackson Bottom Wetlands last year I went up to a viewing area where I frequently see both Blue Heron and Bald Eagles. I was appalled to find an individual flying a drone on a park in a bird viewing area where clearly it would land from and previously taken off there. There were no birds visible which makes sense with an active drone disturbing their environment. Here are my thoughts. State Parks and beaches should be closed to drone take-off and landings except where they can be safely allowed State Parks should determine where to allow drones based on the best available science State Parks should create an independent technical working group to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts State Parks should include a final map(s) of designated drone take-off and landing locations on their website

No drone take-offs or landing to occur within 100 miles of any observed birds and/or known nesting locations or from seal haul out and pupping areas

Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.

All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time. State Parks should include strong enforcement mechanisms in final rules

Thank you,

Tammy Spencer

Washington County Resident

Portland Audubon Board Member



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Friday, March 4, 2022

**Commenter name (if provided):**

Judith Lepuschitz

**Commenter email (if provided):**

oceanmoon1@yahoo.com

**Public comment:**

Hello,

Our relationship with nature is already highly questionable. I am a highly educated, open minded citizen. Yet, it is beyond me why anyone needs to "entertain" themselves by commanding a noisy, intrusive, and potentially dangerous robotic apparatus. The dangers to wildlife and humans alike are well documented.

If it is impossible to outlaw the use of drones, then strict limits on their use must be created:

-Drones should not be allowed ANYWHERE along the coast - not near campgrounds or beaches or cliffs or state parks, state and national recreation areas and the like. There should be a protected zone along the entire Oregon coastline, from north to south, and many miles wide, all the way to the east, to the coastal mountain range.

-Drones should not be allowed in the airspace above any city or town or village.

If drones can't be outlawed, then any law regulating them should be constructed in a way that their operation will only be legal in very limited areas, like designated "drone playgrounds" far away from people, wildlife, etc.

Judith K. Lepuschitz, Ph.D.

Vice Consul (Ret.)

U.S. Department of State



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 4, 2022

**Commenter name (if provided):**

Lisa Bosca

**Commenter email (if provided):**

bosca38@q.com

**Public comment:**

I am a fifth generation Oregonian. Over the years I have grown more aware and cultivated a deeper understanding of our roll on this planet. It's not to be taken for granted, or dominated by our needs for entertainment. It needs each of us as stewards, for all inhabitants without a voice. I greatly enjoy and appreciate our beautiful and unique Oregon State Parks and truly hope drone activity will be strictly regulated with all attention toward protecting, caring and not disturbing all naturally winged species.

My voice is their unobtainable opportunity to speak.

Please do what is right and what legacy you choose to be a party to.

Lisa Bosca





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 4, 2022

**Commenter name (if provided):**

Monica Ozwoeld

**Commenter email (if provided):**

monioz@comcast.net

**Public comment:**

As a person who spends a lot of time hiking, backpacking and snowshoeing I I fully support putting restrictions in place. I know how it feels when I see and hear the drones above me when I am out in nature. It destroys the peace and solitude of the areas for me, not to mention how I must be for he various wildlife inhabiting those areas. Thanks for setting up these restrictions.

Monica



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 4, 2022

**Commenter name (if provided):**

Susie Stevens

**Commenter email (if provided):**

susieps2@yahoo.com

**Public comment:**

First, thanks so much for giving us this opportunity to give you input on drones. Hopefully you'll close all the parks & beaches to drone take-offs & landings except where safe & use best available science to determine where to allow. We should have an independent tech. working group to say where those could be allowed that protect wildlife (meanwhile allowing status quo use). Please include final maps of locations on your good website. In areas that are approved for drone use, include in the rules not allowing within 100 meters of any observed birds/nesting, seals and they'd be discontinued if repeated disturbances occur in same areas. Please review areas periodically based on best science and have strong enforcement in place for final rules. Thanks for your help in this important issue, Susie Stevens Florence



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Friday, March 4, 2022

**Commenter name (if provided):**

Kira Talo

**Commenter email (if provided):**

krayor@gmail.com

**Public comment:**

To whom it may concern,

Thank you for providing this opportunity. I have had a number of encounters with drones in parks and on beaches that were unpleasant. Our state parks and beaches should be a place for relaxing in nature, where we can “unplug,” not another place where we have to constantly navigate technology. They should also be places for protecting wildlife from stressors such as drones. Here are some recommendations: All state parks and beaches should be closed to drone take-off and landings. State Parks should determine where to allow drones based on the best available science, with an aim to minimize impact on wildlife as much as possible. State Parks should create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts.

While designated areas are being determined, status quo drone use would continue (i.e. this would not ban all drone use at any time during the process).

State Parks should include a final map(s) of designated drone take-off and landing locations on their website.

In areas that are approved for drone use, include in the rules: No drone take-offs or landing to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas.

Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.

All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time. State Parks should include strong enforcement mechanisms in final rules.

Thank you,

Kira Talo RN



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Friday, March 4, 2022

**Commenter name (if provided):**

Nora Polk

**Commenter email (if provided):**

nora.mattek@gmail.com

**Public comment:**

Thank you for providing this opportunity to comment. I recommend all state parks and beaches be closed to drone take-off and landings except where they can be safely allowed. State Parks should determine where to allow drones based on the best available science. State Parks should create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts. While designated areas are being determined, status quo drone use would continue (i.e. this would not ban all drone use at any time during the process). State Parks should include a final map(s) of designated drone take-off and landing locations on their website. In areas that are approved for drone use, include in the rules: No drone take-offs or landing to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas. Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location. All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time. State Parks should include strong enforcement mechanisms in final rules. Sincerely, Nora Polk



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Friday, March 4, 2022

**Commenter name (if provided):**

Kyenne Williams

**Commenter email (if provided):**

kyennew@yahoo.com

**Public comment:**

Hello, and thank you for providing an opportunity for the general public (e.g. voters) to comment. I hesitate to recommend legislation unless it will be enforced (the last thing anyone needs is more good intentions enacted without the means or will to follow through). Specifically - Having grown up on the Oregon coast, I know firsthand how vulnerable many bird and wildlife populations are to hazing and unnecessary 'publicity'. So I strongly encourage that all state parks and beaches be closed to drone take-off and landings except where they can be safely allowed. State Parks should determine where to allow drones based on the best available science (rather than guesses, popularity contests, etc). Maybe asking why we 'need' or want drones in public spaces. Please consider the creation of an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriately designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts. While designated areas are being determined, status quo drone use would continue (i.e. this would not ban all drone use at any time during the process). State Parks should include a final map(s) of designated drone take-off and landing locations on their website. In areas that are approved for drone use, the following should be included: No drone take-offs or landings to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas. Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location. All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time. Again, there must be funding and personnel to ensure strong enforcement mechanisms in final rules. Thank you for your consideration, Kyenne Williams. "I learned silence from the talkative, tolerance from the intolerant, and kindness from the unkind." - Khalil Gibran



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 4, 2022

**Commenter name (if provided):**

Kate Ferrandino

**Commenter email (if provided):**

nowallremains@gmail.com

**Public comment:**

Dear Oregon State Parks Staff, Thank you for the opportunity to comment on the use of drones in state parks and on beaches. Please close state parks and beaches to all drone use except where the most up to date and accurate science shows drones can safely land and take off. It would help if you created a group including agency, academic, NGO, and tribal experts to determine where drones would have the least cultural impact and impact on wildlife. Please make sure finalized maps of where drones are allowed and not allowed are posted on each park or beach website as well as posting these suggested rules: No drone take-offs or landing to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas. Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location. All areas should be periodically reviewed for the impact drones are having on wildlife and these rules should be strongly enforced. These steps are vital to protect vulnerable sea birds. The wildlife found in our state beaches and parks help enliven these beautiful areas and let us come close to and connect with nature. It is our imperative responsibility to do all we can to protect wildlife as we enjoy Oregon's beautiful outdoor areas. Thank you again for your kind attention. Best, Kate Ferrandino 97209 Sent from my heart (she/her)



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Friday, March 4, 2022

**Commenter name (if provided):**

Kelsey Parada

**Commenter email (if provided):**

kelsey.parada@gmail.com

**Public comment:**

To whom it may concern,

I recommend all state parks and beaches be closed to drone take-off and landings except where they can be safely allowed.

State Parks should determine where to allow drones based on the best available science

State Parks should create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts.

While designated areas are being determined, status quo drone use would continue (i.e. this would not ban all drone use at any time during the process)

State Parks should include a final map(s) of designated drone take-off and landing locations on their website

In areas that are approved for drone use, include in the rules:

No drone take-offs or landing to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas.

Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location. All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time.

State Parks should include strong enforcement mechanisms in final rules.

Thank you for your time and consideration.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 4, 2022

**Commenter name (if provided):**

Dorothy van Winkle

**Commenter email (if provided):**

dorothyvanwinkle@yahoo.com

**Public comment:**

Most people who go into the great outdoors are there to find peace in the quiet and beauty surrounding them. That is ruined by the steady, intrusive noise of drones. At Iron Mountain a couple of years ago, all hikers were stunned then angered by the intrusion of one drone. Imagine if it were 10 drones? Drones should be banned from all popular outdoor activity areas. They are banned from the Wilderness areas, but most of Oregon is not a designated wilderness area. Please let us keep one place to go that is free of technology and noise. Thank you.



**Note: This public comment was accidentally omitted due to human error. We apologize for the mistake.**



## Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Friday, March 4, 2022

**Commenter name (if provided):**

Wendy Swanson

**Commenter email (if provided):**

wendyturnerswanson@gmail.com

**Public comment:**

I'm writing to recommend and support the Portland Audubon position on Drone Take-off and Landing Rules. I live in Pacific City (and Portland) and enjoy knowing that some tufted puffins nest and raise their young on our haystack rock. I like to visit the nearby Sitka Sedge Natural Area, knowing that plovers nest there in a protected area. To the extent that drones disturb these birds and others, it affects their ability to maintain viable populations. Please adopt science-based rules that will protect wildlife. Thank you.

Wendy Swanson

Pacific City/Portland

State Parks should determine where to allow drones based on the best available science

State Parks should create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts.

While designated areas are being determined, status quo drone use would continue (i.e. this would not ban all drone use at any time during the process)

State Parks should include a final map(s) of designated drone take-off and landing locations on their website

In areas that are approved for drone use, include in the rules:

- No drone take-offs or landing to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas.
- Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.
- All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time.

State Parks should include strong enforcement mechanisms in final rules



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Friday, March 4, 2022

**Commenter name (if provided):**

Nancy Brown

**Commenter email (if provided):**

brownnab@gmail.com

**Public comment:**

Thank you for the opportunity to comment on this important issue. Our parks and wildlife are under enough stress with loss of habitat and over crowding. There is nothing worse than seeing and hearing a drone while out in nature, never mind the disruption to wildlife. I agree with the following recommendations:

Recommend all state parks and beaches be closed to drone take-off and landings except where they can be safely allowed State Parks should determine where to allow drones based on the best available science

State Parks should create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts

While designated areas are being determined, status quo drone use would continue (i.e. this would not ban all drone use at any time during the process

State Parks should include a final map(s) of designated drone take-off and landing locations on their website

In areas that are approved for drone use, include in the rules: No drone take-offs or landing to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas.

Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.

All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time. State Parks should include strong enforcement mechanisms in final rules

Thank you.

Nancy Brown

Forest Grove, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 4, 2022

**Commenter name (if provided):**

Suzanne Vautier

**Commenter email (if provided):**

gourdnbead@yahoo.com

**Public comment:**

I am really concerned about the mouth of the Smith River. I have been going there for years to watch the marine mammals and birds from the parking area. And I have noticed over the years an increase in people boating and kayaking to the sand bar where they then chase off the animals by trying to get a closer look. There are times it is so bad I just want to cry. The thought that drones could be added to the harassment of wildlife at the mouth of the Smith River worries me. Suzanne VautierSelma, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 4, 2022

**Commenter name (if provided):**

Jeff Selck

**Commenter email (if provided):**

westcoastsales78@gmail.com

**Public comment:**

Why are drones getting targeted as a disruption? Pollution from boats and humans do far more damage than that little drone ever will. I really feel people who intentionally use a drone to do disruptive things should be fined rather than screw it up for everyone. I see people freak out about a drone in the air on facebook... "someone was watching me" but the honest truth is that someone is simply flying a drone.. I do it all the time.. get sunset pictures , fly over the ocean at levels allowed to see sea life and wildlife all together. Some of these places have beauty that people won't get to enjoy all because drones are banned. Drones are not the enemy.. just the people who abuse them.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 4, 2022

**Commenter name (if provided):**

Susan Saphone

**Commenter email (if provided):**

susansaphone2@yahoo.com

**Public comment:**

I am writing to ask that drone use is regulated at the Oregon coast and in Oregon State Parks. Just as motor vehicles are limited in our natural settings, drones are intrusive for wildlife and for people enjoying the solace of nature. There should be no drones taking off or landing within 100 meters of observed birds/known nesting sites or near seal haul out and pupping locations. Take-offs and landings should be discontinued near any area that is repeatedly disrupted. The endangered Western Snowy Plover and species of concern such as the Tufted Puffin and the Black Oystercatcher should be especially protected from drone flights. Mapping areas that may be used for taking off and landing and having a strong enforcement mechanism will help regulate drone use. Thank you for accepting comments, Susan Haywood Portland, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 4, 2022

**Commenter name (if provided):**

Erica Skadsen

**Commenter email (if provided):**

organicjewelry@gmail.com

**Public comment:**

I strongly urge you to not allow drone use in State Parks, just like in wilderness areas. It disturbs wildlife and they are extremely disruptive to human users as well. I've had to endure drone feet away from overlooks as people film themselves, seem crashed drones on the sides of cliffs, and had my nature experiences ruined by the obnoxious buzz of drones selfishly filming while ruining everyone else's right to peace and quiet, not to mention privacy concerns. I've been filmed without my consent and there is not way to opt out. I don't visit state parks to have to hear and watch annoying aircraft ruin my day, scare wildlife away, and disrupt mating and nesting birds. If you're going to allow it at all, I urge the strictest of terms, perhaps limited to one day a month, permits required, and severe fines for violators, and most parks closed off from them entirely. Erica Skadsen



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Friday, March 4, 2022

**Commenter name (if provided):**

Katherine Fuller

**Commenter email (if provided):**

kath.fuller3@gmail.com

**Public comment:**

Dear Oregon State Park Planning Team -Thank you for the opportunity to comment on the new drone regulations. I live and work on the coast and have seen the number of drones increase in recent years and have tried to field questions from visitors regarding where they can fly their drones.I spend a lot of time on the beach and on nearby trails and have seen drones being flown near black oystercatcher nests frightening the adult birds and leaving the chicks unprotected, over seal pupping areas when seals are actively giving birth (really!) and over historic lighthouses. All places where drones should not be present.Please limit the use of drones to safe stretches of parkland without sensitive wildlife. And, because wildlife is not static, establish an easy way to limit drones seasonally or on an as-needed basis as wildlife moves from area to area.Regional maps of areas where drones use is prohibited or restricted would be helpful, as would a detailed web-based map.Finally, all park regulations - including drone use - must be enforced. Thank you,Katherine FullerNewport



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 4, 2022

**Commenter name (if provided):**

Linda Zahl

**Commenter email (if provided):**

lindazahl2@gmail.com

**Public comment:**

I am concerned about drone usage at sOregon State Parks and hope that the guidelines suggested by the Auduban Society are accepted. Drones are noisy, disturbing the peace and quiet that I treasure at parks. They also are intrusive in that they carry cameras which are often filming the people which includes children without consent. Please limit drone use within State Parks to not only protect wildlife and nesting birds but to protect the public and our quiet natural spaces.





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 4, 2022

**Commenter name (if provided):**

Sally Krueger

**Commenter email (if provided):**

sallypkrueger@comcast.net

**Public comment:**

I absolutely hate drones and hope you ban all of them. Sally Krueger Eugene



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 4, 2022

**Commenter name (if provided):**

Thomas Boyd

**Commenter email (if provided):**

tomtotalhip@gmail.com

**Public comment:**

I support the proposed rules limiting drone flying. I prefer enjoying public areas without the buzz of drones overhead. I am aware that the unauthorized flight of drones in wildfire zones represented a potential danger to airborne firefighters. Also important is protecting environmentally sensitive areas. Thanks for soliciting this input. Thomas M. Boyd Eugene, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 4, 2022

**Commenter name (if provided):**

Colleen McCaffrey

**Commenter email (if provided):**

oldcolleen@gmail.com

**Public comment:**

As a long-time hiker and avid camper in Oregon I have to agree that No Drone areas are a necessity. Nothing worse than hiking to a beautiful, peaceful spot along a meandering river and encountering a hovering quad drone above you with its annoying whine, driving away any hope of seeing wildlife. As a birder I am horrified by drones on the beaches. Don't the birds have enough humanity to contend with without a drone in the mix?



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 4, 2022

**Commenter name (if provided):**

Georgette Silber

**Commenter email (if provided):**

georgettesilb@aol.com

**Public comment:**

I think that there should be "yes drone areas" not "no drone areas." Drones should only be allowed in areas where they can do no harm to the environment and to animals, plants and humans. The only exception should be when they are being used in an emergency situation by trained (perhaps licensed) responsible people. Georgette Silber



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 4, 2022

**Commenter name (if provided):**

Daphne James

**Commenter email (if provided):**

daphleej@yahoo.com

**Public comment:**

As a frequent visitor to Oregon parks and wildlife areas, I support the proposed No Drone Zones. Daphne James Eugene, Or.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, March 4, 2022

**Commenter name (if provided):**

Ryan Barrett

**Commenter email (if provided):**

ryanbarrett1@gmail.com

**Public comment:**

Hello, Thank you for allowing public comments on this subject. There is nothing more disruptive to wildlife and personal enjoyment than a drone buzzing overhead. Keep nature natural—ban drone use. Ryan



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, March 3, 2022

**Commenter name (if provided):**

Elizabeth Sias

**Commenter email (if provided):**

egsias@gmail.com

**Public comment:**

I am completely opposed to the launching, operating, and landing of drones in state parks. These are outdoor spaces where people come to hike, climb, and enjoy nature and wildlife. Drones are unnatural, loud, and a nuisance, not to mention obnoxious. As a rock climber, I also think that drones pose a danger to all climbers. More importantly, drones are a threat to nesting falcons -- why have climbing wall closures if you're going to allow flying drones?! That's far worse. Please, for the animals who live in these lands and the humans that visit, ban the flying of all drones and unmanned aircraft in all state parks.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 3, 2022

**Commenter name (if provided):**

Tim Nutley

**Commenter email (if provided):**

monsieurchurchy@icloud.com

**Public comment:**

impact/disturbances upon wildlife are already documented by drone use in state parks; rather than fixing the damage later an ounce of prevention now is in order by limiting (or in my preference eliminating annoying drones altogether) in state parks. Tim Nutley Portland OR





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 3, 2022

**Commenter name (if provided):**

Cindy Tofflemoyer

**Commenter email (if provided):**

75catlover06@gmail.com

**Public comment:**

Please take Oregon naturalists reviews and studies into consideration. Tom McCaul spearheaded Oregonian's right for beach access; I certainly don't believe that he would have crafted the bill with the right to negatively impact our beach dependent species. I'm a 63+resident of Oregon and enjoy the coast and it's beaches and shore critters. Not putting restrictive measures on drones or other invasions into sensitive critters nesting and living areas sure seems to be self serving or constituent based thinking. What's the problem? The 4- wheeling communitu has remained robust even though they have some State restrictions.The arrival of new technology requires the State of Oregon to consider all possible adverse impacts. Thank you for your time.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 3, 2022

**Commenter name (if provided):**

Ted Magnuson

**Commenter email (if provided):**

twmagnuson@gmail.com

**Public comment:**

Parks CommissionDear Custodians of the Public SpacesOperating Drones in our Parks makes no sense. We go to State Parks to commune with nature, recognizing that this is a place many animals call home. Drones have no more place here than to run a dog off leach. This being a new technology, I can understand that the law has not kept up with changing practices. However on the face of it, it should be clearly within the bounds of the spirit of previous practice such as don't drive cars on hiking trails, etc.Thank you for all you do to make our state parks the preserves they are.Ted Magnuson



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, March 3, 2022

**Commenter name (if provided):**

Susan Bowden

**Commenter email (if provided):**

rsbowden@comcast.net

**Public comment:**

Thank you for opportunity to comment.

Wildlife disturbances due to improper drone use are increasing on the Oregon coast. Last year the Oregon Black Oystercatcher Project documented a rate of over three drone disturbances per week at active Black Oystercatcher nests. Oregon's iconic coast and state parks are popular visitor destinations. As visitation increases we need to be proactive to minimize wildlife disturbance balanced with appropriate drone use. I live in Florence Oregon. Just saw some beautiful Oyster catchers on my walk last week. They are so beautiful, so vulnerable. Please do all you can to protect them. I am consistently bothered by ATV noise on the weekend. I can't imagine how disturbing to wildlife. We need to minimize any ongoing or potential disturbance. The noise pollution is definitely increasing here on the coast. Especially on the weekends. Thank you,

Susan Bowden

Florence, OR 97439

PS Here's a picture of me picking up trash on the beach!









# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 3, 2022

**Commenter name (if provided):**

Patty Hodgins

**Commenter email (if provided):**

phodg1@gmail.com

**Public comment:**

In response to the invitation to comment on drone restrictions: I haven't witnessed any drone activity, but recently there was a motorized hang glider flying above the Yachats estuary. It was very loud, stayed up for 15+ minutes, and made two separate flights. It was obnoxious in the extreme. It probably isn't possible to add these things to the current discussion, but I wanted to put in a word anyway. Thanks for reading —  
Patty HodginsYachats



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, March 3, 2022

**Commenter name (if provided):**

Patricia Noonan

**Commenter email (if provided):**

patnoon@gmail.com

**Public comment:**

Dear State Parks,I have lived at the Oregon Coast for over 40 years and see the confusion that drones are causing nesting birds, many of which are becoming endangered. The drones often fly around and close to the nesting rocks offshore, causing nesting parents to fly in fearThe drones are also noisy, distracting and intrusive for those of us resting or reading on the beach. Operators often think it is

"fun" to buzz people, families and their dogs. The drones seem to make a low, continuous noise. It appears that many of the drone operators are just learning how to use drones. Do they ever crash into people? I am hopeful that you will find a solution to the drone issues that will protect the wildlife, people and their pets.Thank you for your consideration.Patricia Noonan



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 3, 2022

**Commenter name (if provided):**

Gloria Fisher

**Commenter email (if provided):**

chaskafisher@gmail.com

**Public comment:**

Please ban drones from all state parks, forests and natural areas to protect wildlife and provide privacy for visitors.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 3, 2022

**Commenter name (if provided):**

DeEtte David-Miller

**Commenter email (if provided):**

deettemiller@gmail.com

**Public comment:**

My preference is: No drones allowed in the air space above or within one mile of Oregon State Parks. Thank you, DeEtte David-Miller Florence, OR





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 3, 2022

**Commenter name (if provided):**

Lyn Larson

**Commenter email (if provided):**

llarson@peak.org

**Public comment:**

To whom it may concern, Here's another prime example of unintended consequences of our technology. I've read about drones disturbing nesting plovers on beaches. OK, that's enough right there. This sort of thing needs to be stopped right now. Please come up with legislation with the teeth to strongly enforce it that limits where people can play with their drones. We humans no longer have precedence on this planet, in my opinion. Natural systems and the animals do. Sincerely, Lyn Larson Corvallis



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 3, 2022

**Commenter name (if provided):**

Laura Ehret

**Commenter email (if provided):**

llehret@gmail.com

**Public comment:**

Oregon State Parks people accepting public comments on drone use:I live on the central Oregon coast where amongst other marine life, Oyster Catchers are threatened.On visits I have seen drones operated close to nesting Oyster Catchers by ignorant and/or uncaring people.I am very glad to see Oregon state parks realizing the damage that drones can cause not only to shore birds but to Oregon's reputation as a wildlife destination state.In addition, support, public and financial (public and private), for the re-introduction of sea otters will not benefit by the state parks not taking EFFECTIVE action, i.e. more than signage, on threats to marine wildlife of any kind.Adding more park rangers, fines, and organizing a volunteer presence (with clout), would be a start.L.L.EhretNewport, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 3, 2022

**Commenter name (if provided):**

Jennifer Perry

**Commenter email (if provided):**

jenperry7@yahoo.com

**Public comment:**

this should be regulated! we are losing our wildlife in all other ways, let's protect them from this!  
jennifer perry



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, March 3, 2022

**Commenter name (if provided):**

Nikko Baraquio

**Commenter email (if provided):**

nikkob@windermere.com

**Public comment:**

Thank you for providing this opportunity for the public to comment on DRONES

I recommend all state parks and beaches be closed to drone take-off and landings except where they can be safely allowed

- State Parks should determine where to allow drones based on the best available science
- State Parks should create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts
  - o While designated areas are being determined, status quo drone use would continue (i.e. this would not ban all drone use at any time during the process)
- State Parks should include a final map(s) of designated drone take-off and landing locations on their website
- In areas that are approved for drone use, include in the rules:
  - o No drone take-offs or landing to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas.
  - o Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.
- All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time.
- State Parks should include strong enforcement mechanisms in final rules. Thank you for protecting our wildlife. It is important!

Nikko Baraquio

Portland, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, March 3, 2022

**Commenter name (if provided):**

Linda Zook

**Commenter email (if provided):**

lindazooker@gmail.com

**Public comment:**

- I recommend all state parks and beaches be closed to drone take-off and landings except where they can be safely allowed
- State Parks should determine where to allow drones based on the best available science
- State Parks should create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriately designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts
  - While designated areas are being determined, status quo drone use would continue (i.e. this would not ban all drone use at any time during the process)
- State Parks should include a final map(s) of designated drone take-off and landing locations on their website
- In areas that are approved for drone use, include in the rules:
  - No drone take-offs or landing to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas.
  - Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.
- All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time.
- State Parks should include strong enforcement mechanisms in final rules

Thank you for taking action to help protect wildlife at State Parks and on our public beaches!

Linda Zook

Lake Oswego, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, March 3, 2022

**Commenter name (if provided):**

Gloria Gardiner

**Commenter email (if provided):**

gloria\_gardiner@yahoo.com

**Public comment:**

I have visited and camped at state parks on the Oregon coast and have enjoyed the peace, quiet, beauty, and wildlife of this area.

Parts of the coast are already protected for shorebirds during nesting season, but this protection does not protect adult birds and their chicks from noise that disturbs them and can negatively impact their reproduction and survival.

One source of such noise is drones, which have in recent years become a nuisance for both human visitors to state parks and the wildlife that inhabit them. This negative impact must be regulated by state law. The public interest in preserving endangered wildlife greatly outweighs the pleasure that a small group of humans derives from flying drones over state parks on the Oregon Coast (and elsewhere in Oregon).

Please adopt and implement a regulatory process that:

Is managed by an independent technical working group

Determines, based on the best available science, where drone use would not negatively affect wildlife and where it would;

Prepares a final map of the working group's decisions; and

Prepares for adoption OPRD regulations that contain strong enforcement mechanisms.

Thank you for thoughtfully considering my comments and suggestions.

Sincerely,

Gloria Gardiner

Portland, OR 97213



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 3, 2022

**Commenter name (if provided):**

Jill Riebesehl

**Commenter email (if provided):**

riebes@gmail.com

**Public comment:**

Please, prohibit recreational, commercial or defense personnel use drones in or near our state parks. They are an invasion of peace and quiet and the privacy we pay for with our feet and tax money. Jill Riebesehl



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, March 3, 2022

**Commenter name (if provided):**

Sandra Joos

**Commenter email (if provided):**

joosgalefamily@comcast.net

**Public comment:**

Thank you for providing this opportunity to express my strong opposition to allowing drones in state parks or on beaches unless safe, designated drone take-off and landing areas can be identified. The determination of any such safe areas in which to allow drones must be based on the best available science. To do this, State Parks should create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts. While designated areas are being determined, status quo drone use would continue. In addition, State Parks should include a final map(s) of designated drone take-off and landing locations on their website. In areas that are approved for drone use, the rules should include: 1) No drone take-offs or landing to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas; and, 2) Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location. Finally, all areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time and State Parks should include strong enforcement mechanisms in final rules. Thank you for your efforts to protect the enjoyment of state parks for all.

Sandra Joos  
Portland, OR





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 3, 2022

**Commenter name (if provided):**

Robert Bernstein

**Commenter email (if provided):**

bobbo1946@yahoo.com

**Public comment:**

I am very much against their usage.They are a disturbance to Birds, some endangered, other wildlife and to me..Wife and I would like to see them banned in such areas...Exception could be made for emergencies like firefighting..Respectfully,Robert B. BernsteinLaura WebbPortland



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, March 3, 2022

**Commenter name (if provided):**

Emilie Brooks

**Commenter email (if provided):**

thistleamy5@gmail.com

**Public comment:**

Greetings Thank you for giving me the opportunity to provide some thoughts on drone usage in state parks. I am an amateur photographer and nature lover - so taking photographs of our natural areas within our Oregon state park system is a wonderful blessing. To that end I am an annual contributor to the Oregon State Park fund. However drones and natural areas just do not mix and there is no reason that drones should be allowed to interrupt the birds and animals that make our state parks so special. Drone use is a purely recreational activity and if there is any chance that they may impact wildlife - I think it is imperative we protect the few acres of Oregon State park land (relative to the size of Oregon) for wildlife. I say all this knowing my own son who has a drone - opposes these restrictions - but I know he has many other places he can fly his drone and capture great images. Please protect Oregon's State Parks and the birds and other animals who call our great state home. Sincerely Emilie Brooks Forest Grove, Oregon



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 3, 2022

**Commenter name (if provided):**

Fadra Day

**Commenter email (if provided):**

fadrday@yahoo.com

**Public comment:**

I am emailing to say that I oppose drone use in state parks as it degrades the quality of the natural experience state parks provide. If drone use is allowed it should be strictly monitored and rules enforced for the safety of people using the park and, more importantly, for the safety of wildlife. Drones can disturb wildlife nesting and wildlife's use of habitat when not flown in ways that do not disturb wildlife. Drones also can intrude on peoples' privacy. So, while I am opposed to drone use in state parks, I ask that, in the event drones are allowed, rules are in place and strictly enforced to protect the peace and safety of the public and wildlife.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 3, 2022

**Commenter name (if provided):**

John Morris

**Commenter email (if provided):**

jomomorris51@gmail.com

**Public comment:**

I write to urge you to find ways to reduce or eliminate intrusions on my experience of Oregon State Parks and, even more importantly, protect wildlife, by addressing the growing use of airborne drones and electric bicycles. I feel these have no place on otherwise unspoiled public lands. As more people intrude more places more often the habitat and recreation value of Oregon State Parks is diminished. It may not be a popular move to deny people the use of their new technological toys, but I believe it is necessary to preserve our public park lands. Thank you, John Morris, Nehalem, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 3, 2022

**Commenter name (if provided):**

Karen Berry

**Commenter email (if provided):**

karenrberry1@gmail.com

**Public comment:**

Dear Protectors of our State Parks, In order to protect the wildlife that lives in and/or moves through our State, I urge you to pass a rule stating that all state parks and beaches be closed to drone take-offs and landings except where they can be safely allowed. And that the decision of what "can be safely allowed" be based on scientific findings not political opinion. Thank you for your consideration, Karen Berry, Oregon resident



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 3, 2022

**Commenter name (if provided):**

WG Percy

**Commenter email (if provided):**

pearcyw@oregonstate.edu

**Public comment:**

I go to state parks for quietness and relaxation. Drones flying overhead destroy this experience .  
Please ELIMINATE OR REGULATE DRONES.WG PercyPhilomath



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 3, 2022

**Commenter name (if provided):**

Emily Schnipper

**Commenter email (if provided):**

emily.schnipper@gmail.com

**Public comment:**

Hello! Thank you for this opportunity for comment.

I'm writing to encourage that state parks and beaches be closed to drone take-offs and landings. The effect of increasing drone use on nesting birds, seals, and other wildlife is too great. If drones must be allowed, I would encourage the State Parks to create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts.

Thank you,

Emily Schnipper



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Commenter name (if provided):**

Bill Bradford

**Public comment:**

Please ban drones!

**Date comment received:**

Thursday, March 3, 2022

**Commenter email (if provided):**

billbradford1@gmail.com





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, March 3, 2022

**Commenter name (if provided):**

Bruce Alber

**Commenter email (if provided):**

bpalber@gmail.com

**Public comment:**

I am writing to address a serious error in the wording for the proposed rules regarding The Take-off and Landing of Drones in State Parks. The idea is probably to maintain the peace and quiet fo the Parks by prohibiting loud, buzzy motorized drones. These usually have 4 or more small rotor blades, turning at a high RPM creating a loud buzzing sound. They are flown remotely, sometimes even beyond the sight of the operator or pilot.Please simply insert the word motorized into the new rule language. As written, without the word motorized you will ban the flying of kites, balloons on a tether, model gliders, Frisbees, and other forms of silent flying objects.Please amend the Rule by inserting the word MOTORIZED to solve this obvious problem!Sincerely,Bruce AlberPortland, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, March 3, 2022

**Commenter name (if provided):**

Elena Guevara

**Commenter email (if provided):**

llamalace@hotmail.com

**Public comment:**

I live in Salem and I am greatly in favor of the proposal to create "no drone zones" in and around Oregon state parks and the coast. Drones are noisy and unpleasant. When they have cameras attached, they can invade citizens personal privacy. I support any legislation that reasonably limits where and when drones can be operated. Thank you. Elena Guevara



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, March 3, 2022

**Commenter name (if provided):**

Brett Hunsaker

**Commenter email (if provided):**

misc@hunsaker.org

**Public comment:**

Concerning Oregon State Parks and rules for drones:

Use a light touch policy. Drones should be allowed unless there is a significant negative impact to the public.

Although Oregon can't explicitly stop overflight of nude beaches (only FAA can restrict airspace), and you can limit where they take off and land, a better way would be to post signs politely asking for drone pilots to respect the privacy of those at the nude beach.

Balance use of parks by drone pilots and others.

Rather than completely banning drones, offer "drone days" at the parks where drones can be used. Maybe Wednesday when parks aren't very busy. That way people who want a peaceful walk in the park can know to avoid those days but a drone pilot that wants to capture the beauty of Silver Falls Park can still fly there.

Don't ban drones but help people learn to share.

I hate hiking on trails used by horses because of all the droppings left behind, but I recognize that horse riders have a right to be out in nature too.

Don't believe that drones will hurt people. There will always be more people injured by dogs in the parks than by drones.

Thanks,

Brett Hunsaker



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Thursday, March 3, 2022

## Commenter name (if provided):

Jim McKinnell

## Commenter email (if provided):

jimtrudy@comcast.net

## Public comment:

Dear Oregon Parks and Recreation, As a relatively new drone pilot, I am concerned when read about the move toward "no drone zones." The FAA already has a comprehensive set of regulations which if followed by all recreational and commercial drone pilots would likely minimize the need for further restrictions of drones. I have read OPRD plans to post maps of no launch zones on the OPRD website. One concern with this approach, is how will I know I am currently in a restricted space? Does OPRD plan to create an App similar to B4Ufly or Aloft which shows restricted zones, using my phone's location services? I have also read there may be a way to apply for a "special permit" to take off or land within the closed zones. I hope that any special permit either allows for live approval or the permit is in effect for a span of at least several days to accommodate bad weather conditions on the planned flight date. This year, I have visited two Oregon state parks with disc golf courses. In the areas where disc golf is played, I have seen signs which read "Caution you are entering a disc golf course watch for flying discs." Rather than creating "no drone launching zones", would it be more effective to create areas of the parks where model aircraft are encouraged and put up caution signs similar to the ones for disc golf? Sincerely, Jim McKinnell Salem, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, March 3, 2022

**Commenter name (if provided):**

Dan Christian

**Public comment:**

The current wording leaves much of the implementation to the defined launch areas. This makes public input difficult because there is no guidance about how large or common launch areas may be. It would be helpful if there were either example maps, or a statement of the principles determining launch areas in a particular park. It would be useful if you also defined areas that are "keep out" or have a minimum height. This allows key areas to be protected, which should allow greater freedom outside those areas. Some of these might be seasonal (e.g. bird nesting areas). I would like to argue that drone are a valid use of our shared parks. Drones can capture images and do research that cannot be done from the ground. Obviously, this cannot be to the detriment of wildlife or other uses. I would suggest that there should be a "drone day" once a month where wider access is permitted. People would know that these days might be noisier than the rest of the month, but drone users would have access to areas that are normally off limits. Any "keep out" areas defined for wildlife protection would still be in force. It would be helpful if the permitting process could be reliably done in just a day or two. Drone users may be looking for a weather window or wildlife transit (e.g. whale spotting). If the permit process can be done quickly, then they can apply for permission once there is a likely weather window. It could be that the permitting process become two steps in some cases: general approval for area and activity, then flight approval for specific dates. It may be worth repeating some standard FAA rules: drones should never influence wildlife, and should never be flown over other parties. The FAA is rolling out drone remote ID requirements that should dramatically help with accountability. The negative encounters reported in some of the comments should be quickly eliminated once remote ID takes effect.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Wednesday, March 2, 2022

**Commenter name (if provided):**

Kathleen and Michael Krall

**Commenter email (if provided):**

krallfamily@comcast.net

**Public comment:**

Dear Sir or Madam, We live along the edge of Netarts Bay in Tillamook County, OR. We are volunteers who do bird surveys for Portland Audubon and East Cascades Audubon in Tillamook county. We also monitor the Oceanside State beach wayside for dead birds as part of the University of Washington's COASST program. We support the banning of drones near known bird nesting sites. In our area, this would include the beach near Radar Road, just south of Cape Meares State Park, known as "Short Beach." This popular beach hosts nesting Black Oystercatchers and other bird species. We have observed these birds on their nest the last few years. The joint monitoring project of Portland Audubon and USFW reported in Feb 2020 that "the Oregon Black Oystercatcher breeding population is small but stable with only several hundred individuals. This distinctive bird is considered a bird of conservation concern by the US fish and wildlife service due to its dependence on rocky shoreline habitats, its rarity, and vulnerability to threats including climate change and human disturbance." <https://audubonportland.org/press/new-population-estimate-for-the-black-oystercatcher/> We applaud you for developing new rules to control this popular activity. We think the plan for banning drones to protect nesting sites should include the Snowy Plover protected areas at Sitka Sedge and Cape Lookout/Netarts spit, but also known sites for nesting Black Oystercatchers, including Short Beach, Boiler Bay and others. Thank you, Kathleen and Michael Krall



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Wednesday, March 2, 2022

**Commenter name (if provided):**

Kim Davis

**Commenter email (if provided):**

k.mdavis@yahoo.com

**Public comment:**

I am opposed to the take off and landing of drones in state parks. The recurrent theme in the proposed rules that drones "may not harass, disturb, pursue, or injure...." is insufficient assurance of protection for our wildlife. The proposed rules do not address the disturbance already experienced by wildlife and humans from the use of drones. Drones are not silent. They emit highly irritating noise frequencies for hours at a time. They interfere with other activities enjoyed by park users, including hiking, birdwatching or simply relaxing. They are invasive to other people's privacy and eliminate all hope of experiencing solitude. To allow the few who want to play with machines, motors and tech toys to disturb the peace of so many who relish time spent outdoors is a disservice to those thousands who wish to continue enjoying Oregon parks. Please start over. These rules do not adequately address the interests of Oregon's citizen majority and do nothing to protect our commons. Thanks. Kim Davis97306



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Wednesday, March 2, 2022

**Commenter name (if provided):**

Jane Sommers

**Commenter email (if provided):**

fulgurantefarm@protonmail.com

**Public comment:**

I support no-drone zones in all state parks. I have encountered drones at several State Parks, degrading my experiences there. Besides being an annoyance, it is also an invasion of privacy, since drones are likely making video of park visitors, without consent. One has no control over how that video will be used. I would support a complete ban of drones in all parts of every state park, unless a permit is issued for purposes that benefit the public, such as to promote the park or to survey for hazards. When a permit is issued it should be required that the recipient of the permit post notices at the park entrance(s) indicating when and where the drone will be flown. Jane Sommers Salem





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Wednesday, March 2, 2022

**Commenter name (if provided):**

Mark Hoops

**Commenter email (if provided):**

seahusker@outlook.com

**Public comment:**

Hi,I would like to see drones banned from state park or at least outline a restricted spot for them as well as some restrictions along the coast to preserve natural sounds.Mark Hoops



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Wednesday, March 2, 2022

**Commenter name (if provided):**

Eli Conlee

**Commenter email (if provided):**

eli@climbersforchrist.org

**Public comment:**

Dear OPRD - Thank you for your timely work in assessing the use and impact of unmanned aircrafts systems ("drones") in state parks & recreation areas. While I certainly enjoy the lower impact results of professional footage for permitted films and awesome capacity for drones in research use, I am opposed to non-permitted drone use in the state parks. Amateur drone usage is, at best, an inconvenience to other user groups and poses disturbance to users and wildlife alike. At worst (and unfortunately, seemingly common in some state parks) it is dangerous for other user groups and a threat to wildlife. I primarily frequent Smith Rock State park (dozens of days per year) as an outdoor professional and recreational climber, hiker, and biker. Drone users have consistently ignored raptor closures, "buzzed" climbers, and added noise interference to all users. Drone pilots are certainly not homogenous in behavior, but I have seen many of them disregard rehabilitation zones or set up off-trail in sensitive areas as they are more focused on their activity than the safety or sensitivity of the area. At Smith Rock and elsewhere, drone usage also seems to violate not only the natural outdoor experience, but personal privacy as well. For amateur and un-permitted users, there is no consideration of others' personal privacy and other users are often filmed without knowledge or consent. Whereas in permitted use, there is at least an expectation of professionalism in how the footage may be used, or a clearer path of public record for users to communicate with the permitted users if they wish to not have their image used. I am in favor of permitted drone use in many state recreation areas and parks, and see the shared user group value in allowing amateur usage in certain areas as long as clear parameters are set for drone pilots and other user groups are aware that drone usage and possible filming is occurring. But I sincerely ask that the OPRD committee restrict drone usage to permitted professionals (ideally only those who maintain their FAA Remote Pilot certification) at Smith Rock and any other parks & recreation areas where rock climbers and nesting raptors are active. Appreciatively, Eli C.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Wednesday, March 2, 2022

**Commenter name (if provided):**

Chris Phillips

**Commenter email (if provided):**

chrisedge@yahoo.com

**Public comment:**

There is not a more beautiful place to fly than our state parks and coastlines. Do not make the process more laborious for overstressed NP employees. Free the drones.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Wednesday, March 2, 2022

**Commenter name (if provided):**

Stephanie Zloof

**Commenter email (if provided):**

shaiakenziethomas@gmail.com

**Public comment:**

Thank you much for the opportunity to comment on the proposed rule. I thank you for proposing a balanced rule that I myself as a pilot can support! I have been a drone pilot for about a year now and love all the opportunities and beautiful sites to explore. Oregon State parks in my opinion are some of the most beautiful places in America and the consideration for us is very much appreciated.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Tuesday, March 1, 2022

**Commenter name (if provided):**

David McRae

**Public comment:**

Regarding establishing a takeoff and landing zone for drones at Smith Rock State Park; It seems impossible to allow drones to fly within the state park without disturbing wildlife and compromising the natural experience for all other users. I would propose drones only be allowed in search and rescue operations where locating an injured person is critical to their safety. Otherwise, Please do not compromise the natural environment for the enjoyment of a few. Thank you for your consideration.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Tuesday, March 1, 2022

**Commenter name (if provided):**

Aimee ROSEBORROUGH

**Commenter email (if provided):**

aimeeclimbs@gmail.com

**Public comment:**

Drones should be prohibited at smith rock. They are loud and disturb the natural area.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Tuesday, March 1, 2022

**Commenter name (if provided):**

Jim Preston

**Commenter email (if provided):**

jetjock737@verizon.net

**Public comment:**

I appreciate you allowing us to comment on this proposed rule. As a retired airline pilot, I enjoy flying my drone as much as possible. (It's less risky, but doesn't pay nearly enough!) I am completely in support of certain restrictions with regard to sensitive wildlife areas, crowded campgrounds and parking lots. But there are so many more open areas where no one will be bothered by drones. And Oregon parks are all absolutely beautiful places to see; and in many cases, those areas may ONLY be visible by a drone. The FAA is very specific in how drones should be operated, and I would never advocate against those regulations. But I'm also strongly in favor of reducing regulation in open areas where very few people are, and where the scenery is incredible. Therefore, I hope you'll adopt this proposed rule and allow drone aviation to proceed within Oregon's state parks. Thank you very much for working to permit certain drone operations, and thank you as well for allowing me to comment. I hope that Oregon's foresight and proactive approach will be copied nationwide. You're pioneers!



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Tuesday, March 1, 2022

## Commenter name (if provided):

Robert Taylor

## Commenter email (if provided):

fullbookcases@yahoo.com

## Public comment:

I think the proposed rule is a good one. I know that when I post a photo on my FB page or a group page - it generates a lot of interest by non-drone people to go to that area. Drone photography is much like other photography but from a different perspective. It will generate interest in the parks.

I am physically limited in my mobility. This gives me a way to see many aspects of nature that are often only seen by a few. This is a blessing for physically handicapped people. Too many feel parks are only for the able bodied that can hike 20 miles to some remote spot. Regarding

noise, I have found that most people do not even recognize my drone was in the air until I am landing. Finally it should be noted that although drones are very popular and will increase attendance to the parks. I have never flown my drone in a park or beach where there was another drone. The skys of the park will not be "filled with drones".





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Tuesday, March 1, 2022

**Commenter name (if provided):**

Tom Kelly

**Commenter email (if provided):**

backpackersk@gmail.com

**Public comment:**

I support the new drone regulations and hope they are strongly enforced. In fact, I would like to see more stringent regulations in any natural or wilderness-like environment throughout the state. There is a reasonable expectation of privacy in such settings. The noise, disruption of wildlife, and safety considerations dictates this should be passed and even possibly strengthened. Thank you for your efforts. Tom Kelly Salem, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Tuesday, March 1, 2022

**Commenter name (if provided):**

Tom Egan

**Commenter email (if provided):**

mtnarete@msn.com

**Public comment:**

I am against drones at smith rocks, it is a violation of my privacy,,, they are frequent during raptor nesting,,, and are annoying



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Tuesday, March 1, 2022

**Commenter name (if provided):**

Roger Webb

**Commenter email (if provided):**

webb.roger@gmail.com

**Public comment:**

Greetings, My name is Roger Webb and I am an FAA licensed remote pilot and UAS operator. I am opposed to all but the most limited restrictions on flying within state parks, and in particular, along State beaches, waterways and other public areas. While I am sympathetic to issues regarding noise, privacy, environmental and animal protection and security of sensitive areas, these needs can be met without the proliferation of blanket ban areas. At the end of the day, we, as pilots, have already been asked to take on a lot. We learn the radio, air traffic control systems and airspace, weather and a litany of regulations, which I find reasonable. We are already prohibited from flying over people. We are required to register our drones, carry a license and receive regular, updated, training from the FAA every 2 years. We are now being asked to equip our craft with strobes and transponders. If we're going to do all of this, and comply, at the very least we should have the privilege, as it were, the right I'd rather say, to fly on our public land. If we are going to erect No Drone Zones, there should be ample days and times per year, during times of good weather, where the limitation is restricted and we're free to photograph areas of significance (like historic sites) and get some time set aside to enjoy the public land that we also pay for. Any Drone Free Zone should come with Come Fly Days where the restrictions are lifted or reduced to the lowest reasonable level. For campgrounds, there are already quiet times and noise controls in place at night, and there's no problem with drone flyers being subjected to the same, while still being able to capture a nice view of the family campsite, being able to take group photos and capture the scenery of the area. When flying outside of your personal campsite, reasonable height restrictions could be in place allowing flight above 50 or 100ft, which would limit prop noise, improve privacy and still allow legitimate photography activity to take place. For beaches, there are myriad reasons why blanket prohibiting drone use is a bad idea. You're limiting some of the most widespread, open air areas for beginning pilots to practice. With the noise of wind and waves, and people playing music, the drone prop noise is of minimal concern here. And when we're talking about beaches, we're talking about miles of open space on land that's as much ours as anyone else who are free to drive, run with their dogs, or play loud music, all of which I find annoying but won't ask to have banned out of a sense of mutual respect for others who may wish to enjoy the environment in their own way. If it bothers me that much, I'll move a few dozen yards down the sand. All this said, I still sympathize with the need for quiet and privacy in enjoying our parks. I am not completely opposed to restricting flight, but it needs to be done on an individual basis, for each area, with sufficient input and due regard to the flying community. We pay our taxes, park fees, and follow the many regulations imposed to obtain our privilege to fly. We demand the right to be able to execute it, and on the public land that we've helped pay for. Thank you for your time, Roger Webb, Dayton, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Tuesday, March 1, 2022

**Commenter name (if provided):**

Michael Mooney

**Commenter email (if provided):**

mmooneyor@me.com

**Public comment:**

I fully support the creation of rules to limit use of drones as proposed. I suggest whatever means you use to communicate these new rules also repeat the existing State and Federal (FAA) rules prohibiting Drones below certain altitudes and in certain airspace. What are the proposed enforcement and penalties for violating these new rules? Drones have quickly become a nuisance to wildlife and outdoor enthusiasts. In much more serious cases they have posed an immediate danger to aircraft involved in fire fighting and aircraft operations around airports. Drones use has skyrocketed as they have become very cheap and some of those operating them do so range from being completely oblivious to rules to fully intending to do harm. The military has invested considerable resources to combat this threat so this is Oregon State's opportunity to get this done in an effective manner the first time. Regards, Michael Mooney Turner, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Tuesday, March 1, 2022

**Commenter name (if provided):**

Carolyn White

**Commenter email (if provided):**

mcwhite\_7@verizon.net

**Public comment:**

I am in support of the OPRD rules guiding the take-off and landing of drones in Oregon state parks and along the ocean shore. As a FAA Part 107 certified sUAS pilot, I am entrusted to uphold, promote and maintain my sUAS flights in a professional manner. Paramount to designing one's flight maneuvers is the safety of the flight field environment. Upon reviewing the OPRD additional rule sections, the park departments are working collaboratively to ensure that designated and appropriate zones are delineated for safe drone take-off and landing zones. Drone pilots are readily utilizing apps to submit flight plans directly to the FAA for approval of flights which are guided by the aerial and geographic boundaries set in place through our LAANC system. Adding the versatility of the appropriate drone take-off and landing zones within the Oregon state parks and along the ocean shore is feasible with the monitoring and regulations as proposed.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Tuesday, March 1, 2022

**Commenter name (if provided):**

Wood Sabold

**Commenter email (if provided):**

photowood@mycomspan.com

**Public comment:**

There should be no place for mechanized drones on state beaches or any state park. Parks and Beaches should be enjoyed without distracting noises.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Tuesday, March 1, 2022

**Commenter name (if provided):**

Jennifer Birdsong

**Commenter email (if provided):**

jbirdsong1@twu.edu

**Public comment:**

Properly trained drone pilots that adhere to the Federal Aviation Authority (FAA)'s rules know how to fly when to fly, when to land, and how to respect the privacy of others and the land. I have read many public comments that cite irresponsible drone pilot behavior, and I am in complete agreement with eradicating this type of drone pilot. If both hobbyist and professional drone pilots were trained and versed in proper park rules (i.e., where they are permitted to fly and where they are not allowed to fly), FAA guidance and regulations, and weather and safety protocols, everyone could enjoy the park. Drones are such a fantastic tool. · A disabled person might use a drone to capture a view otherwise unavailable to them because they cannot hike a trail or scale a mountain. · A photographer can hone a new skill, photographing nature. · A Search and Rescue mission can gain valuable practice for a real task. Please consider allowing drones the space to utilize your park for the many missions and many opportunities that drones provide.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Tuesday, March 1, 2022

**Commenter name (if provided):**

Eric Hanscom

**Commenter email (if provided):**

eric@iciplaw.com

**Public comment:**

The Utah state park system has done an excellent job of allowing drones in certain parks to both raise revenue and allow drone flyers to promote the parks through their YouTube and Dronestagram pictures and videos. This proposal seems very reasonable and seems to balance recreational and environmental interests.





# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Monday, February 28, 2022

## Commenter name (if provided):

Pat Chewning

## Commenter email (if provided):

pchewn@comcast.net

## Public comment:

I have attended two meetings of the group developing rules for "drones" at the Oregon State Parks. In both of those meetings, the draft proposals included my suggestion to include "motorized" to the definition of a drone. I was surprised to see the new proposed rule (2/15/2022) out for public comment. It has removed the word "motorized" from the definition of a drone. The reason given to me is not wanting to "specify drone technology". The summary of my comments are as follows: The existing definition of a drone in the proposed rule language is too inclusive. It would include non-motorized unmanned flying devices such as kites, frisbees, model gliders, balloons, etc. Correct Definition The correct definition of a drone adding the word "motorized" would exclude the devices that are not drones and not causing problems. 36-010-0015 Definitions (26) "Unmanned Aircraft System" means motorized device defined under ORS 837.300(4). 736-021-0015 Definitions (26) "Unmanned Aircraft System" means motorized device defined under ORS 837.300(4). Consistent and Not a Burden The use of the word "motorized" is consistent with existing park rules and does not create a burden to distinguish drone technology. Please consider these comments as the final wording of the Drone rules is formulated and put into practice. Thank you, Pat Chewning

# Oregon State Park Rules for Takeoff & Landing Of Drones

## Proposal to add "**motorized**" to Drone Definition

- Submitted for Public Comments 2/15/2022 thru 4/7/2022
- Submitted for Public Hearings of 3/30/2022 and 3/31/2022
- by Pat Chewning ([pchewn@comcast.net](mailto:pchewn@comcast.net))

# Introduction and History

- Tradition of flying unmanned objects on Oregon Ocean Shores and State Parks
  - Kite Festivals, Frisbee Golf, Frisbee on the beach
  - Model gliders from dunes, cliffs, and flatlands.
- Complaints and problems started with the recent introduction of Drones (motorized).
- Recent OSP rule-making meetings (11NOV21, 24JAN22) included the word "motorized".
- 2/15/22 Rule wording removed the word "motorized" to avoid "specifying Drone Technology".

# Drone Definition Is Too Inclusive

- Referenced Definition:

*ORS 837.300(4) “Unmanned aircraft system” means an unmanned flying machine, commonly known as a drone, and its associated elements, including communication links and the components that control the machine.*

- Unmanned (kites, balloons, model gliders, frisbees are not manned)
- Flying (kites, balloons, model gliders, frisbees do fly)
- Neither the Parks Dept nor the Legislature intends to regulate these non-drone devices.
- These devices are not drones, are not problems

# Drone Definition Should Include



- Drones
  - Motorized (Noisy, ability to hover, ability for sustained long-distance flying, often flown out of sight of operator)

# Drone Definition Should Not Include



- Non-motorized (Silent flight, cannot fly long distances from operator, flown in sight of operator)

# Proposed Drone Definition Language

## 736-010-0015 Definitions

(26) “Unmanned Aircraft System” means  
motorized device defined under ORS 837.300(4).

## 736-021-0015 Definitions

(26) “Unmanned Aircraft System” means  
motorized device defined under ORS 837.300(4).



# Consistent with Existing Park Rules Language

## Oregon Administrative Rules

### Rule Text Search Results

Your search for motorized (exact match) OR motor (exact match) returned 30 results.

[New Search](#) | [Modify Search](#)

Rows per page: 25   Page 2 of 2  

| Rule Number                  | Rule Title                         | Chapter Name                    |
|------------------------------|------------------------------------|---------------------------------|
| <a href="#">736-010-0015</a> | Definitions                        | Parks and Recreation Department |
| <a href="#">736-015-0040</a> | Miscellaneous Rentals and Products | Parks and Recreation Department |
| <a href="#">736-040-0048</a> | Wallowa River Scenic Waterway      | Parks and Recreation Department |
| <a href="#">736-015-0006</a> | Definitions                        | Parks and Recreation Department |
| <a href="#">736-015-0020</a> | Overnight Rentals                  | Parks and Recreation Department |

- "Motorized" or "Motor" already appears 30 times in the OAR rules for State Parks



# Proposal Does not Impose an Undue Burden to Discern "Drone Technology"

- Park personnel can already distinguish between cars and bicycles, surfboards and motorboats, etc... (motorized and non-motorized vehicles and watercraft)
- Park personnel should be able to easily distinguish between motorized Drones, and non-motorized flying devices. (Noisy vs silent, propeller-driven vs no propeller, etc.)

# Summary

- The existing definition of a drone in the proposed rule language is too inclusive.
  - It would include non-motorized unmanned flying devices such as kites, frisbees, model gliders, balloons, etc.
- The correct definition of a drone adding the word "**motorized**" would exclude the devices that are not drones and not causing problems.
- The use of the word "**motorized**" is consistent with existing park rules and does not create a burden to distinguish drone technology.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, February 28, 2022

**Commenter name (if provided):**

Mark Reed

**Commenter email (if provided):**

mreed52@gmail.com

**Public comment:**

I am a hiker and rock climber who has been recreating at Smith Rock State Park for over 50 years, since 1970. Over that time, the park has adapted to explosive growth in visitor numbers, development of homes and ranches on neighboring properties, and a catastrophic wildfire, among other changes. Remarkably, the park has continued to provide a high quality recreational experience for those who are willing to put up with growing crowds and the increasing difficulty of finding a place to park. It also continues to provide critical habitat for a variety of raptor species, including bald eagles, golden eagles, peregrine falcons and others. I know of no other state park that offers such a juxtaposition of high visitor numbers, world class rock climbing, and outstanding wildlife habitat. I regard the use of drones as a threat to the unique values embodied at Smith Rock State Park. I have personally observed drones being flown in close proximity to raptor nesting areas, and in proximity to climbers engaged in a potentially quite hazardous activity. Additionally, because of their unnatural flight pattern and noise, drones are distracting, annoying, and greatly diminish the feeling of being in a natural area. Finally, because of their powerful optics, they violate other visitors' expectations of the privacy normally experienced in an outdoor recreational setting. I recognize that drones have legitimate scientific and managerial functions that may require their occasional use by professionals within the park boundaries. Additionally, professional photographers and videographers may have legitimate needs to occasionally use drones for gathering unique imagery. Such use, I believe, is managed through a permit process. However, drones being flown by members of the general public offer no benefit to the park or to other users of the park. They only benefit individual drone operators, at the expense of the quiet and privacy experienced by other visitors, wildlife habitat, and the safety and security of rock climbers. I ask that recreational use of drones be banned within Smith Rock State Park, and that professional use of drones be managed by a permit process that clearly weighs the potential costs to wildlife and to other users of the park. Mark Reed 516 E Tyee Dr Sisters, OR 97759



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, February 28, 2022

**Commenter name (if provided):**

Aleks Weir

**Commenter email (if provided):**

alekswithak@gmail.com

**Public comment:**

Ban the drones! That buzzing sound is annoying. Mistaking them for birds is annoying. The great feeling of nature being bombarded by whizzing technology is annoying. Ban the drones!-Aleks Weir of Gresham, OR



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, February 28, 2022

**Commenter name (if provided):**

Noreen Zupan

**Commenter email (if provided):**

noreenzupan@msn.com

**Public comment:**

Sorry. Will keep this short. Please no drones in this most beautiful park. So annoying and disruptive while enjoying tranquillity and beauty in this park. Thank you



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, February 28, 2022

**Commenter name (if provided):**

Geoff Hance

**Commenter email (if provided):**

irongeo3309@gmail.com

**Public comment:**

From personal experience, I can tell you that drones are a distraction to climbers, and hikers, on the rock. This creates a dangerous element in an already dangerous recreational activity and climbing sport. Both require absolute attention to safety at critical moments. If you allow drones, you are clearly allowing a ratcheting up of risk. This may create legal liability in the event of an accident. I strongly advise you to NOT allow drones in Smith Rock State Park, except on strictly supervised, and rare occasions when nature films are being produced for the general public. Even then, the supervision needs to be real time. All it takes is one distracted step, or movement on the rock, and potentially fatal events take on an increased probability. Thanks, Geoff Hance, Bend, Oregon



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, February 28, 2022

**Commenter name (if provided):**

Gwen Schneider

**Commenter email (if provided):**

gschneider61@gmail.com

**Public comment:**

I am 100% AGAINST the invasiveness of drons in state parks or around state parks. I can only image what the birds think. I got to enjoy watching a Bald Eagle land and one of the large pines along the crooked river at Smith. We quietly observed the bird. I can only imagine how obnoxious it would've been for the bird if some person decided to try to get close-ups with their drone. Drones are far too disruptive and the parks are disruptive enough with so many people. Thank you



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Sunday, February 27, 2022

**Commenter name (if provided):**

Cathy Feely

**Commenter email (if provided):**

earthleor@yahoo.com

**Public comment:**

I've seen people fly drones around bodies of water where birds of prey are living and when the birds try to attack the drone, they don't stop flying the drone, they think its some sort of game to see how they can maneuver the drone around the birds. there needs to be some sort of rule that the minute wildlife takes notice of the drone they immediately have to land it and leave, and it needs to have severe penalties in it. Supposedly there are some sort of rules in place but they are not enough to deter this behavior.





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Sunday, February 27, 2022

**Commenter name (if provided):**

Eric Linthwaite

**Commenter email (if provided):**

ivanthedark@hotmail.com

**Public comment:**

Drones were the final straw in my decision to never climb again at Smith Rock



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Saturday, February 26, 2022

## Commenter name (if provided):

Patrick Chewning

## Commenter email (if provided):

pchewn@comcast.net

## Public comment:

Oregon State Park Rules for Takeoff & Landing Of Drones Submitted for Public Comments 2/15/2022 thru 4/7/2022 Submitted for Public Hearings of 3/30/2022 and 3/31/2022 by Pat Chewning (pchewn@comcast.net) Introduction and History Tradition of flying unmanned objects on Oregon Ocean Shores and State Parks Kite Festivals, Frisbee Golf, Frisbee on the beach Model gliders from dunes, cliffs, and flatlands. Complaints and problems started with the recent introduction of Drones (motorized). Recent OSP rule-making meetings (11 NOV 21, 24 JAN 22) included the word "motorized". 2/15/22 Rule wording removed the word "motorized" to avoid "specifying Drone Technology". Drone Definition Is Too Inclusive Referenced Definition: ORS 837.300(4) "Unmanned aircraft system" means an unmanned flying machine, commonly known as a drone, and its associated elements, including communication links and the components that control the machine. Unmanned (kites, balloons, model gliders, frisbees are not manned) Flying (kites, balloons, model gliders, frisbees do fly) Drone Definition Should Include Drones Motorized (Noisy, ability to hover, ability for sustained long-distance flying, often flown out of sight of operator) Drone Definition Should Not Include Kites, Balloons, Model Gliders, Frisbees Non-motorized (Silent flight, cannot fly long distances from operator, flown in sight of operator) Proposed Drone Definition Language 736-010-0015 Definitions (26) "Unmanned Aircraft System" means motorized device defined under ORS 837.300(4). 736-021-0015 Definitions (26) "Unmanned Aircraft System" means motorized device defined under ORS 837.300(4). Consistent with Existing Park Rules Language "Motorized" or "Motor" already appears 30 times in the OAR rules for State Parks Proposal Does not Impose an Undue Burden to Discern "Drone Technology" Park personnel can already distinguish between cars and bicycles, surfboards and motorboats, etc... (motorized and non-motorized vehicles and watercraft) Park personnel should be able to easily distinguish between motorized Drones, and non-motorized flying devices. (Noisy vs silent, propeller-driven vs no propeller, etc.) Summary The existing definition of a drone in the proposed rule language is too inclusive. (It would include non-motorized unmanned flying devices such as kites, frisbees, model gliders, balloons, etc.) The correct definition of a drone adding the word "motorized" would exclude the devices that are not drones and not causing problems. The use of the word "motorized" is consistent with existing park rules and does not create a burden to distinguish drone technology.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Saturday, February 26, 2022

**Commenter name (if provided):**

Jesse Firestone

**Commenter email (if provided):**

firestonej@gmail.com

**Public comment:**

Drones ruin the outdoor experience for everyone within a huge radius, for the enjoyment of a tiny few. No one who isn't flying the drone is going to find that noise and distraction to be anything but irritating. It's totally unethical outdoor behavior to fly a drone and the regulations should reflect that.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Friday, February 25, 2022

**Commenter name (if provided):**

Sophie Avila

**Public comment:**

"The mission of the Oregon Parks and Recreation Department (OPRD) is to provide and protect outstanding natural, scenic, cultural, historic and recreational sites for the enjoyment and education of present and future generations." OPRD website. I would not recommend to allow drone take-off and landing at State Parks and along ocean shore, for the following reasons:- Noise disturbing the wildlife and any potential negative implications (being scared by the noise, will they try to find other more hospitable and peaceful habitat?) - noise pollution that is counter to the peaceful enjoyment of nature by all. Allowing drones seems to contradict the mission of the OPRD as stated on their website.- People visit Oregon for the beauty of its nature and its coast in particular. We are all enjoying the beauty of its nature. Imagine the coast with plenty of drones flying around. This will not be nature anymore. Imagine walking around with the noise of drones around... not the most enjoyable experience. - Potential pollution (drones getting stuck in trees, falling into the ocean, getting stuck on the Haystack). - how will this work on crowded beach? How safe will it be?- How will you control the number of drones allowed? Thank you for seeking comments and feedback.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, February 25, 2022

**Commenter name (if provided):**

Evan West

**Commenter email (if provided):**

airinc10@yahoo.com

**Public comment:**

Please take actions to limit the use of drones in state parks, similar to how they are limited in national parks. They are disruptive, dangerous, and generally unnecessary. Thank you.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, February 25, 2022

**Commenter name (if provided):**

Jesse Lederer

**Commenter email (if provided):**

jesse.lederer123@gmail.com

**Public comment:**

I enjoy going to Oregon state parks to enjoy the natural scenery an outdoors, especially smith rock state park. It is kinda hard to enjoy these places with a buzzing noise floating above your head, not to mention the camera that can be pointed at you anytime. Just feels kinda creepy and may cause agitation and irritation to the experience. Drones in general are a major distraction and I feel invade the experience of the natural environment an outdoors. Personally I do not believe drones should be allowed in any state parks for this reason.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, February 25, 2022

**Commenter name (if provided):**

Wes Figueroa

**Commenter email (if provided):**

westonfig@gmail.com

**Public comment:**

Drones should be allowed for better angles on photography and to encapsulate the beauty and wonders of Oregon. There can be strict rules on height and protected spaces, but drone photography helps show the greatness of this state.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, February 25, 2022

**Commenter name (if provided):**

Alexis Croucher

**Commenter email (if provided):**

alexis.croucher@gmail.com

**Public comment:**

Please keep the use of drones out of Oregon State Parks. No one can consent to being filmed and they intensely add to noise pollution in places people are purposely seeking nature not tech.





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, February 25, 2022

**Commenter name (if provided):**

Joanna Merson

**Commenter email (if provided):**

merson.joanna@gmail.com

**Public comment:**

Drones are a total nuisance to both other visitors and wildlife and should not be allowed to take off or land in our parks or hassle, "buzz", and disturb the people and animals in the parks.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, February 25, 2022

**Commenter name (if provided):**

Rebecca Lowe

**Commenter email (if provided):**

rebecca96lowe@gmail.com

**Public comment:**

Drone flying in public parks is alarming and irritating. I am not in favor of drone flying being permitted.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, February 25, 2022

**Commenter name (if provided):**

Jeremy Bowler

**Commenter email (if provided):**

jerbowler@gmail.com

**Public comment:**

While I understand that many people enjoy flying drones, as a park user, any drones nearby have a negative impact on my experience. I enjoy visiting parks for the natural beauty and the whirring sound produced impacts this experience. Additionally I believe animals are also negatively impacted by drones. I request that drones not ever be allowed to fly within park boundaries.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Friday, February 25, 2022

**Public comment:**

No drones! They detract from the natural environment which we seek in these places.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, February 24, 2022

**Commenter name (if provided):**

J Casto

**Commenter email (if provided):**

jcasto@protonmail.com

**Public comment:**

Can we ban drones from Smith Rock altogether? They are disruptive to the natural habitat, and the noise ruins the experience for hundreds of climbers and thousands of hikers. The flying of drones as a hobby negatively affects many other hobbies, and benefits very few. All the hobbies should be able to get along together! There could totally be drone-specific flying times, like a little drone festival 2 times a year or something. Let's all just go climbing together instead!-cheers



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, February 24, 2022

**Commenter name (if provided):**

Tracie Weitzman

**Commenter email (if provided):**

tlweitzman@gmail.com

**Public comment:**

Please continue to ban drone use at State Parks, especially at Smith Rock. Drones are a nuisance to wildlife and climbers.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, February 24, 2022

**Commenter name (if provided):**

Dana Walters

**Commenter email (if provided):**

dcwalters@wsu.edu

**Public comment:**

In my experience, I have been harassed by drones in state parks. I have been stalked and harassed by drone pilots with no consequences from local blm officials. I think they drones detract from the outdoor space, endanger wibe life and are an overall public menace



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, February 24, 2022

**Commenter name (if provided):**

Brendan Scanlan

**Commenter email (if provided):**

brendanscanlan@mazamas.org

**Public comment:**

Drones should not be allowed to be flown in state parks. They disrupt wildlife, cause noise pollution, and are a nuisance to those who seek solitude in the natural environment. I've had multiple drones fly by at smith rock while climbing, which creates a dangerous distraction for both the climber and belayer.





# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Thursday, February 24, 2022

## Commenter name (if provided):

Samuel Bedell

## Commenter email (if provided):

bedellympian@gmail.com

## Public comment:

As a person who frequently uses numerous Oregon State parks, but especially Smith Rock, which I visit multiple times a week most months of the year, I think that drone use should be banned or at the very least severely limited and restricted. I use Smith Rock for hiking, running, rock climbing, wildlife watching and just a peaceful natural area. I think many users in these categories will agree with my opinion that drones are loud and obnoxious to a high degree. They ruin the experience of many for the sake of a small handful of drone owners, who can fly in many other public locations in our state. They also disturb animal populations in this small and extremely unique natural area. However, more importantly, it endangers rock climbers who constitute a large percentage of the user population. As a climber I have had numerous occasions where drones have been flown near me while climbing. The noise in this situation inhibits communication between climbing partners which is critical on longer and more complex routes. Drone pilots, who do not understand or appreciate the situation, will hover their drones near climbers for several minutes at a time, cutting off their communication with the person responsible for their safety so that they can take photos and videos. Unfortunately, situations that make the best pictures are often the most precarious for climbers. Finally, I have also had drones fly close to my ropes and equipment. Climbing ropes are very difficult to break, but can be cut much more easily. I understand that this is unintentional and may not represent the majority of drone pilots, but my experiences lead me to believe that without strict enforcement it is just a matter of time before drone pilots cause a deadly accident with climbers.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, February 24, 2022

**Commenter name (if provided):**

Adam Spangler

**Commenter email (if provided):**

spangladesh@gmail.com

**Public comment:**

For a myriad of reasons from sound and light pollution to the dangers posed to humans, animals, all flora and fauna, and of course the peacefully serenity often sought after within our treasured parks, drones take off and landing and flying should be outlawed within Oregon's State Parks.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, February 24, 2022

**Commenter name (if provided):**

Kimberly Johnson

**Commenter email (if provided):**

krjohnson0628@gmail.com

**Public comment:**

I do not believe drones should be allowed at state parks. Smith Rock State Park is home to a variety of wildlife and provides a nesting space for Golden Eagles. Already at the park, I've heard drones during the nesting times for the birds. I worry that people will not respect or be aware of guidelines to protect wildlife. In addition, hearing the buzzing of the drone negatively affects my experience as a park visitor.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, February 24, 2022

**Commenter name (if provided):**

Amy Lovato

**Commenter email (if provided):**

AthenaRehab@gmail.com

**Public comment:**

I really hate them. They feel invasive. The noise is a nuisance as well. Users should have permission from property or land management, whether public or private.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, February 24, 2022

**Commenter name (if provided):**

Kyle Stokes

**Commenter email (if provided):**

kstokes55@yahoo.com

**Public comment:**

The noise drones creates ruins my time in public spaces, I will not return to any park or area where drone use is frequent.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, February 24, 2022

**Commenter name (if provided):**

Dylan Zoebelein

**Commenter email (if provided):**

zoebeleind@gmail.com

**Public comment:**

I believe that drones are generally annoying in a place that is about being in nature. I think that drones should only be flown by people that applied for a limited amount of permits and passed a licensing class. If that cannot be done, an outright ban is preferred.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Thursday, February 24, 2022

## Commenter name (if provided):

Brad Bennett

## Commenter email (if provided):

benbradnett1@gmail.com

## Public comment:

With the speed of technological advancement these days, we as people have to become increasingly aware of how new technologies affect different facets of our lives. Drones are a new and rapidly growing technology that allows users to capture incredible and breathtaking content, that until recently, was a lot harder to obtain. However, the issue with drones is when they begin to change the atmosphere of the places they're in. As an avid Smith Rock State Park climber, it's unfortunate when the faint voice of hikers down below, the cacophony of crickets in the distance, and the plethora of cawing birds is substituted for the disturbing, overwhelming whirr of drone blades chopping through the air. With the seemingly sudden spike in drone popularity, it's become a regular situation I find myself in: Watching the natural environment disturbed by the growing number and sound of drones. They have their place, don't get me wrong, I just don't think it's in protected state parks.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, February 24, 2022

**Commenter name (if provided):**

Anna Saphier

**Commenter email (if provided):**

annasaphier@gmail.com

**Public comment:**

I believe drones should not be permitted to take off and land in state parks, aside from those licensed and used for commercial purposes (think revenue). Drone are loud and distracting (speaking from the perspective of a rock climber who has had a drone hover overhead). Their noise is a nuisance.





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, February 24, 2022

**Commenter name (if provided):**

Sarah Hill

**Commenter email (if provided):**

smackenzie11@georgefox.edu

**Public comment:**

Trying to climb with drones flying around is very distracting and dangerous. I've been a volunteer medic at outdoor festivals and seen many drone injuries from them accidentally being flown into people and the propellers cutting skin. The buzz of a drone while trying to lead climb and communicate with your belayer is a safety issue, not to mention the risk of them crashing or hitting someone. Drones are distracting and annoying to peaceful nature places like Smith Rock, please keep them out. People go to Smith Rock to be in a peaceful, beautiful atmosphere. Someone running their drone takes away from that atmosphere for everyone nearby. A few cool drone shots for one person isn't worth ruining the atmosphere for many.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, February 24, 2022

**Commenter name (if provided):**

Hunter Murray

**Commenter email (if provided):**

hmurray25@gmail.com

**Public comment:**

Hello, Thank you for taking public comments on this topic. I recreate multiple times a week at Smith Rock and love the park dearly. I believe that drones are a nuisance to wildlife and that their loud noises disrupt the human experience of nature within the park. I love walking along the crooked river and hearing the cacophony of geese and the quiet babbling of the water. It is a place where I can go to escape the noise of development and appreciate the natural world. Natural spaces are disappearing rapidly and I believe that we must defend such havens.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, February 24, 2022

**Public comment:**

Drones are great at capturing incredible imagery and can also be useful in search and rescue missions of lost or injured hikers, climbers, skiers, etc. That being said, they are intrusive and annoying to those enjoying the natural environment, and they can be harmful to raptors, other birds, and other wildlife. I would like to see permit requirements for any drone use in our parks.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, February 24, 2022

**Commenter name (if provided):**

Liz Babbs

**Commenter email (if provided):**

ebabbs@creswell.k12.or.us

**Public comment:**

I personally would like to see drones kept out of wild spaces including state parks. The purpose of setting aside land to be less developed and more wild is so people can engage in activities outside of the buzz and hum of the world. Drones are a real detriment to that. They are horribly intrusive and feel very invasive. Besides this they are really distracting. Many people seek out state parks for outdoor recreation, one of which is rock climbing. Rock climbing takes focus and is also another chance to engage with the natural world. As a climber I have had the experience of drones hovering near my head while I'm 60 feet off the ground and it was wildly infuriating and horribly distracting. I hope that state parks continue to maintain this space away from invasive technology.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, February 24, 2022

**Commenter name (if provided):**

Garrett Genereux

**Commenter email (if provided):**

gpgenreux@gmail.com

**Public comment:**

Please ban take off/landing/flying of drones from state park lands. They significantly detract from the experience of all other users and create privacy concerns. At the very least they should need a permit.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, February 24, 2022

**Commenter name (if provided):**

Conor Jonson

**Commenter email (if provided):**

conor.jonson@outlook.com

**Public comment:**

I do not think drones should be allowed at Smith or in any state parks. Drones disturb nature as well as 99% of park users. No drones!



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, February 24, 2022

**Commenter name (if provided):**

Paul Nanawa

**Commenter email (if provided):**

paul.nanawa@gmail.com

**Public comment:**

I am against drones in our parks. They are noisy, ruin the outdoor experience many go to the parks to find



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, February 24, 2022

**Commenter name (if provided):**

Nellie Trenga-Schein

**Commenter email (if provided):**

trengasc@ohsu.edu

**Public comment:**

I feel it is very important to continue restrictions on drone use in Oregon state parks. Drones are incredibly disruptive and can interfere with the safety of others utilizing outdoors spaces. An important example of this is climbers at smith rock as the noise of drones interferes with communication and inadequate control of drones by inexperienced pilots could be dangerous for climbers. Please keep our outdoor spaces protected and do not allow drone flight or landing in state parks.





# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Thursday, February 24, 2022

## Commenter name (if provided):

Sarah Birmingham

## Commenter email (if provided):

sarahbirmingham42@gmail.com

## Public comment:

I don't doubt that there are a lot of very cool applications of drones- I've seen a lot of really neat video footage and photography that would be otherwise difficult to obtain, and there's a lot to say for their use in doing visual inspections for safety, monitoring, or research purposes in locations that would be dangerous for a human to access. A lot of people are going to write in about the threat to wildlife, to park user safety and enjoyment, but I'd like to approach this from a different angle: what we need to consider about drone photography in state parks in the context of digital privacy. Most drone activity is more likely to be, at best, a nuisance to park users both wild and human, and at worst, another invasion of privacy in an age when personal privacy is being assaulted on all other fronts. With the advent of Ring cameras ushering in an age of residential street surveillance, wanton data sharing between digital conglomerates with minimal ability to withdraw consent, and the privatization and subsequent restriction of formerly communal spaces, public parks with low-to-zero cost of access and reasonably anonymized usage policies remain a bastion of personal freedom relatively free of surveillance. Smith Rock might report an aggregated total of more than 700,000 visitors in a year, but blissfully lacks the capacity to report on which trails they each used, how long they spent there, who they talked to and what they talked about, what they spent or considered spending money on while in the park, or which rock face is the best-performing based on analysis of sophisticated eye-tracking technology. While most recreational drone usage is destined for an instagram post and not as a data point in some villainous corporate plot, it's important to recognize the baby steps that lead from one to the other and the ways in which drone photography is unique in this aspect as compared to traditional handheld or stationary camera. It's unlikely that you'll be aware of the drone taking your picture; if you're lucky, you'll be able to hear it, if you're even luckier you'll be able to spot it, but only very infrequently will you be able to locate its operator. A hidden camera is also difficult to detect, but has the virtue of remaining in one spot and is easier to evade. A person holding a camera is typically the easiest of the three to identify, and also the quickest way to locate the person taking your picture, and provides some avenue towards figuring out why. I also think it's easy to jump to the most dystopian possibility, but I think it's easy for a lot of people to resonate with this privacy invasion on a more personal level. As a woman with an abusive ex-boyfriend from years ago who owned a drone, I know I still feel dread when I hear one nearby and think of who could be behind it. It also doesn't have to be that immediately personal. Most women and, horrifyingly, many girls can attest to being watched, leered at, or photographed in public in ways that made them uncomfortable; they're already trained to be hypervigilant on the ground and shouldn't need to turn their attention skyward as well. So much of your life is on camera—at work, online, in commercial, private, and residential spaces. I ask that OPRD commit to minimizing surveillance on public land by restricting drone usage so that these lands can continue

to be loved and enjoyed by people who are comfortable, safe, and empowered.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Thursday, February 24, 2022

## Commenter name (if provided):

Amberley Ransom

## Commenter email (if provided):

amberleyransom@gmail.com

## Public comment:

I don't think drones should be allowed in parks. In my experience, drone operators typically don't look beyond getting the aerial footage they want. I've seen drones be disruptive to both people and wildlife. The noise and visual distraction has directly interfered with my ability to hear my climbing partner while he was on a section of wall where I could not see him. I've watched birds circle and swoop at drones getting too close to their nests. For me personally, drones negatively impact my experience in nature, whether I'm climbing, hiking, or just enjoying a view. I'm also a digital content creator, and I don't see the financial payoff of drone footage to be worth the negative impact they can cause in nature.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, February 24, 2022

**Commenter name (if provided):**

Danielle Nelson

**Commenter email (if provided):**

daniellevnelson@gmail.com

**Public comment:**

I am against the takeoff and landing of drones in state parks. I often use Smith Rock State Park for outdoor rock climbing, and in such a high risk situation, the distraction of someone else's drone suddenly coming up can be dangerous. Additionally, the sound carries much further than speech or even music, making it difficult to hear fellow climbers' rope commands or enjoy the sounds of nature.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, February 24, 2022

**Commenter name (if provided):**

Michael Martin

**Commenter email (if provided):**

michael.martin.97@me.com

**Public comment:**

Definitely think they shouldn't be allowed. Really bugs me when people use them to film climbers / any one with out consent. Not only because of the noise pollution but they can be really distracting in a time when trying to focus on performing / enjoying outdoors activities safely. I kinda feel like it's the equivalent of people who bring speakers into the outdoors but it just sounds like a giant mosquito.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, February 24, 2022

**Commenter name (if provided):**

Kevin White

**Commenter email (if provided):**

kevin.white.pnw@gmail.com

**Public comment:**

I do not think you should be able to operate a drone within the Smith Rock State Park.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, February 24, 2022

**Commenter name (if provided):**

Michael Fletcher

**Commenter email (if provided):**

hmfletcher300@yahoo.com

**Public comment:**

As a frequent visitor to state parks in Oregon as well as an avid photographer and supporter of visual arts I think drone use should be banned. Nothing is more distracting than a drone buzzing above you while you are trying to enjoy the natural landscape. Drone photography is a cool visual but the disruptions to the other visitors experience as well as their impact on birds and other wildlife far outweighs any benefit in my opinion. I've also had friends who have been followed by drones against their desire likely filming without their consent. It raises a situation when a drone is flying around it immediately makes everyone uncomfortable. Thank you for your consideration.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, February 24, 2022

**Commenter name (if provided):**

Peter Wurden-Foster

**Commenter email (if provided):**

peter.wurden@gmail.com

**Public comment:**

Drone use within state parks should be banned completely. People travel to state parks to be surrounded by nature and enjoy the ambiance and atmosphere. Drone noise and use is a severe detriment to this atmosphere; the incessant buzzing and whirring of drones, with accompanying concerns that you are getting recorded or the idiot pilot will crash and damage you or the environment. The "benefit" to one person of getting their video, without the consent of others they are undoubtedly recording, is not worth the experience being ruined for the hundreds of other park users.





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Commenter name (if provided):**

Colleen Baird

**Public comment:**

No drones in the parks please! They're awful

**Date comment received:**

Thursday, February 24, 2022

**Commenter email (if provided):**

cmbaird88@gmail.com



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, February 24, 2022

**Commenter name (if provided):**

Claire Engelen

**Commenter email (if provided):**

claire.engelen@gmail.com

**Public comment:**

Sound pollution, scaring birds and potential for trash (drones) to fall into the ocean/atop trees/unreachable zones. Let state parks be sanctuaries for animals and people alike but don't allow for unnecessary commotion and trash to be sanctioned.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, February 24, 2022

**Commenter name (if provided):**

Erica Raggio

**Commenter email (if provided):**

erica.raggio@gmail.com

**Public comment:**

Taking off and landing of drones is currently not monitored in OR state parks and have been shown to have a negative impact on wildlife. Research shows they are a disturbance to the peaceful environment many seek out in our state parks and coastline. While climbing at Smith Rock, strangers have flown their drones dangerously close to me, putting myself and other climbers at risk. Use of drones should be by permit (\$\$) only in our parks.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, February 24, 2022

**Commenter name (if provided):**

Burt Rosen

**Commenter email (if provided):**

jburtrosen@gmail.com

**Public comment:**

Drones destroy the peace and tranquility of our beautiful places. They should be banned.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, February 24, 2022

**Commenter name (if provided):**

Kaileen Barley

**Commenter email (if provided):**

admin@klaree.com

**Public comment:**

I use drones as a way to capture fond memories with my family. I take my family to state parks often, sometimes using a drone to film our time together. Perhaps, a proper drone license or permit held by operators would be a solution to all? Users can take an online course with acknowledgment to rules and regulations regarding drone use in Oregon state parks. I oppose a full ban.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, February 24, 2022

**Commenter name (if provided):**

Stephen Nelson

**Commenter email (if provided):**

73.nelson@gmail.com

**Public comment:**

As a State park annual pass holder and user of several parks I would greatly prefer that use of drones is prohibited in State Parks. They are an invasion of privacy and create stress because of noise and speed.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, February 24, 2022

**Public comment:**

I am a FAA107 certified drone pilot and a frequent visitor of Oregon state parks. I strongly believe that drone usage should be banned or very strictly regulated with a permit system in our state parks. Drones are useful tools for many industries and fun to fly as a hobbyist. However, they are also noisy, distracting, and even dangerous in the hands of inexperienced pilots. In addition, the Audubon Society has found that drones are harmful to nesting birds. Drones have become a major nuisance at Smith Rock State Park in particular, where I have had UAV's buzz by me while rock climbing. It's unfair that drones should be allowed to disrupt the experience of all park goers. Ask yourself, next time you visit Smith Rock, would you rather enjoy the falcons and eagles overhead or a drone buzzing by as you try to enjoy some peace and quiet in the outdoors?



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Thursday, February 24, 2022

## Commenter name (if provided):

Quinn Rohlf

## Commenter email (if provided):

qrohlf@gmail.com

## Public comment:

Hi! I'm a long-time user of Oregon's natural areas - I was raised backpacking in the Columbia River Gorge before I could walk by myself, and these spaces mean a great deal to me. I've also been a longtime user of Smith Rock State Park. I started climbing at Smith in 2008, and have been trail running and climbing in the park on a regular basis for the subsequent 14 years. I also have a great deal of experience and appreciation for what multirotor drones are capable of. I designed and implemented a custom system for drone localization and control during my undergrad, and I have enjoyed many climbing documentaries that were only made possible through the use of commercial drones by licensed professional operators. However, I strongly feel that personal, non-permitted drone usage by amateur operators on our public lands is extremely disruptive to almost all other user groups at best, and in many cases it is actively dangerous. I've been "buzzed" by hobbyist drones at Smith Rock more times than I can count, often while on the wall climbing where being able to focus is paramount to my safety. I personally know rock climbers who have been struck by drone rotors when a drone user "decided to get a closer look". I also strongly believe that the noise impact of drones alone should disqualify them from usage in a public natural setting – the whine of a drone rotor strongly detracts from the experience of hiking, climbing, running, or just sitting and enjoying our natural areas, and due to its high pitch, can be heard at extreme range. To minimize user conflict, preserve the natural experience in our public natural areas, and avoid dangerous situations caused by amateur drone operators, I strongly feel that drone usage within Oregon Parks properties be restricted to FAA certified drone pilots, and subject to a standard commercial-use permitting process.





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, February 24, 2022

**Commenter name (if provided):**

Waverly Davis

**Public comment:**

Although I appreciate some beautiful footage and see the utility of drones in science, I cannot condone their usage in State Parks and along the ocean shore. As someone who enjoys being outside, I find drones distracting, dangerous, harmful to wildlife, an invasion of privacy, and largely unnecessary. Here's a personal example: I was belaying my climbing partner at Smith Rock State Park in Oregon when I heard an incessant loud buzzing from a nearby drone. The noise was so distracting I could not hear my partner trying to communicate with me. I had to wait until the noise diminished to be able to hear her. Although other forms of noise can also be disruptive (such as large crowds), I found the drone buzzing to be especially distracting and more importantly-impossible to locate and stop, whereas a noisy crowd nearby is easy to talk to and ask people for some quiet. In addition, once my partner was safely on the ground, I was able to locate the drone and realized that the flier was attempting to get footage of the resident bald eagle, which has been nesting at Smith Rock for over 5 years. This broke my heart as drones are detrimental to nesting birds and can create a host of issues for their health and wellbeing. I also find drones to be an invasion of privacy. Because you oftentimes cannot locate the flier of the drone, you have no capability of asking not to be videotaped. This is bothersome when I am trying to enjoy a day out in nature and do not want to interact with any type of media, let alone be involuntarily added to someone else's footage. I strongly believe drones have no place in state parks. Most camera phones are capable of taking gorgeous footage and photos of the places we interact with and are a great substitute to the amount of detriment and negative impact drones cause. Waverly Davis



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, February 24, 2022

**Commenter name (if provided):**

Jessica Beauchemin

**Commenter email (if provided):**

beauchemin.jess@gmail.com

**Public comment:**

Hi, I'm writing today to express my concern with rule changes regarding drone use in State parks. I understand that when used responsibly, drones can be an enjoyable way for some users to enjoy our natural spaces. However, it appears that a very small percentage of drone pilots actually know, understand and follow the rules when operating around people. I have never had one single positive experience around someone flying a drone. They are becoming so cheap and easy to acquire that literally anyone can get one. I do not think it should be left up to park employees to become drone police on top of the million other duties they are required to perform on the job. Just trusting people to know and follow the rules is a big ask. I believe that anyone who wants to fly a drone in a busy park or coastal park should require some kind of license/permit and that usage should be extremely limited. As other commenters have noted, drones invade people's privacy, negatively impact animals and destroy any sense of solitude you might have. The state parks should continue to be a respite for people to enjoy the outdoors without having noisy drones fly overhead (or straight into your arm without apology, which has happened to me!) Thanks for your consideration.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, February 24, 2022

**Commenter name (if provided):**

Max Tepfer

**Commenter email (if provided):**

mtepfers@gmail.com

**Public comment:**

Hello, I'm a frequent visitor of Smith Rock State Park. I work there as a climbing guide, recreate there weekly climbing for myself, and am also the president of a local non profit that advocates for climbing access in Central Oregon including doing a lot of maintenance work on climbing infrastructure at Smith Rock State Park. I personally feel that drones should be allowed in state parks on a conditional basis. They should be tightly regulated such that each drone pilot is required to get a permit from OSP each time they want to fly a drone. Additionally drones should not be permitted during raptor nesting season. Lastly there should be a stiff fine for anyone operating a drone outside those parameters. Drones do have the potential to capture stunning imagery and I think that they do have a place on state park lands, but they also have the potential to be annoying and dangerous to other users and to threaten wildlife. As a result I think that if drone use is permitted, it needs to be carefully regulated to minimize these impacts.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, February 24, 2022

**Commenter name (if provided):**

Grant ortman

**Commenter email (if provided):**

grantortman@gmail.com

**Public comment:**

I strongly oppose the taking off or landing/ flying of drones on parks and beachfronts. Besides it's obvious noise level they are also dangerous. Much like many motorists don't understand the speeds of cyclists (and cause accidents accordingly) many drone pilots don't have a good sense of depth. They will fly closer than they should and will sometimes will almost buzz you. I couldn't imagine falling on a climb and possibly get hurt all because of the distraction of an overly zealous "pilot". If they do want to fly I think a permit system should be in place at minimum.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Thursday, February 24, 2022

## Commenter name (if provided):

Kara Parker

## Commenter email (if provided):

kjparker17@gmail.com

## Public comment:

I think flying drones in Smith Rock state park could pose a serious safety issue to climbers. There are not enough park rangers to monitor who is flying drones and where which means inexperienced users could fly their drones too close to climbers. Climbing is an inherently dangerous sport that requires focus and precision. I personally would feel less safe if drones were allowed freely.

- 1) they crash when they lose connection and there are certainly places where this could occur. I have been hit by a drone before and it hurt.
- 2) there is already loose rock above climbs and to have a drone accidentally land/crash above a route would lead to rock fall on unsuspecting climbers below
- 3) Smith Rock is home to many species of birds who nest here. Flying drones could significantly alter their behavior.

We all must share the area and weigh the pros and cons. Currently, there is a healthy, mutual sharing of the park in which hikers enjoy the area as well as climbers without encroaching on one another. Climbers are able to communicate with hikers and educate when necessary in regards to safety issues. With flying a remote controlled drone, we wouldn't be able to know who was flying it or where from, thus unable to communicate a safety issue.

Last but not least, Smith is a riparian home. While the FAA is developing rules for drone use, they have not considered the impacts on wildlife. NPS has banned drones in parks. Drones would significantly deter birds of prey from feeling safe nesting here. It would be a tragedy to take away their space, the educational opportunities that their presence provides and the connection to nature many come to Smith for.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, February 24, 2022

**Commenter name (if provided):**

Evan Webb

**Commenter email (if provided):**

evanwwebb@gmail.com

**Public comment:**

I spend a lot of time at Oregon parks. I find the drone community to be a damper on my experience while using these outdoor spaces. Drones are noisy and seem to be a danger to local avian species. If I could banish them from OR parks I would do it in a heartbeat.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Thursday, February 24, 2022

## Commenter name (if provided):

Mason Marsh

## Commenter email (if provided):

masonmarsh@mac.com

## Public comment:

Thank you for the opportunity to comment on this proposed rule change regarding the use of drones in state parks and along our coastline.

I am an Oregonian and a professional photographer who often uses drones to capture images I cannot get from the ground. I am certified by the FAA (Part 107) to operate an Unmanned Aerial System (UAS) and I have watched as drone operators, both amateur and professional, proliferate many of our shared public spaces so I understand the concerns many people have about the noise, safety hazards and potential privacy invasions drones often bring. Despite these credible concerns, I want to offer my full support to the rule changes as proposed and offer further steps the state should take to ensure access to responsible drone operators to our shared spaces.

Being a drone operator who carefully and respectfully operates my UAS equipment in state parks and along the coast, I know that my rights to fly as granted by the FAA come with constraints that I must abide by. In addition to these rules, I have taken further steps to ensure that my flights do not disturb wildlife, annoy my fellow park visitors, or otherwise disrupt the environment I seek to capture photographically. The fact that my drone is imperceptible to people and wildlife when it is up and away from them, along with my careful location selection process, allows me to peacefully photograph difficult to reach locations while limiting my impact. I have found that when I act responsibly, I can get the images I am seeking without bothering anyone or anything, which is something I can't say when tromping around sensitive areas on foot. By allowing respectful drone access to these areas, the state can preserve our freedom to enjoy our public spaces while preserving the peace, safety and enjoyment of others. To facilitate this respectful and responsible access to drone operators, I would encourage the state to develop a registration and education system for those seeking to fly drones in the parks and along the coast, (outside of the prohibited areas identified by the state, of course). This system would help responsible drone operators like me to identify prohibited areas, follow additional guidelines to protect sensitive areas and wildlife, and keep clear of areas where drones would disturb other park users. I would even be willing to purchase an annual permit tied to this registration and education process, because my continued access is incredibly valuable to me as an Oregonian and as a photographer. I do believe that requiring all drone operators who wish to launch and land within state parks and other public areas of the coast to register and invest financially in a cooperative system would foster a mutually-beneficial relationship and curtail irresponsible drone operations. It's in my best interest as an aerial photographer that other drone operators who do not wish to follow the rules in place to safeguard everyone and everything around them be restricted from our precious natural spaces. As is clear

from the majority of the comments collected so far, the general public is weary of the noise and invasiveness of drones. The fact that irresponsible and even reckless drone use in our public spaces has lead to this common concern, I am eager for the state to work with responsible drone operators like me to mitigate these concerns while maintaining access to qualified, educates and respectful operators.

MASON MARSH

[masonmarsh.comphotocombobulate.com](http://masonmarsh.comphotocombobulate.com)





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, February 24, 2022

**Commenter name (if provided):**

Abbey Larkin

**Commenter email (if provided):**

abilarkin@gmail.com

**Public comment:**

Please continue to ban drones from State Parks, including Smith Rock. Drones have the possibility of driving adult birds away and, thereby, disrupting nests in the park. Plus, drones are noisy and could interfere with the activities of people who visit the park.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, February 24, 2022

**Commenter name (if provided):**

Julie S

**Commenter email (if provided):**

soaring\_orion@yahoo.com

**Public comment:**

No drones/less drones/maybe permits for drones? They are loud and in everyone's space and i don't think I want to be in anyones video footage



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, February 24, 2022

**Public comment:**

While drone photography is neat, it does not justify the nuisance to other recreational users and wildlife, in my opinion. Drone usage for collecting scientific data (lidar, etc) is a very effective technique and could be considered on an individual basis for official, state sanctioned use, given that all environmental/wildlife impacts are evaluated. However, carte blanche drone usage should not be allowed for both official and recreational users. In order to appease both sides, maybe drone users could be granted an annual, short drone "season" when they are allowed to take off and land in state parks or ocean shore, similar to a hunting or fishing season, so that all users know what to expect well in advance



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, February 24, 2022

**Commenter name (if provided):**

Karina Ramos

**Commenter email (if provided):**

kramosnava@icloud.com

**Public comment:**

They should be illegal because it disturbs someone experience and nature has well.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Wednesday, February 23, 2022

**Commenter name (if provided):**

Damian Fagan

**Commenter email (if provided):**

dfagan574@gmail.com

**Public comment:**

Thank you for the opportunity to comment on this issue of drones flying within Oregon State Parks. Though drone operators may be responsible in flying their aircraft to avoid buildings, airplanes, ships, and other structures, I'm skeptical that many of them would operate these drones in a wildlife-friendly manner. By that, I'm referring to nesting, foraging, or migrating birds and sea mammals. The potential disturbances of flying drones to wildlife does not seem compatible, nor does it provide adequate protection for these creatures. I think aligning Oregon State Parks with National Park and National Wildlife Refuge rules is a good thing by banning take-off and landing of drones in the parks. The other disturbance is the invasion of personal privacy that drones are capable of. Thank you,



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Wednesday, February 23, 2022

**Commenter name (if provided):**

Roger Joys

**Commenter email (if provided):**

roger.joys.register@gmail.com

**Public comment:**

Thank you for allowing me to comment. I am a frequent visitor to numerous state parks in Oregon. I'm an avid outdoor activities person and really love the diversity of our state park system. I am also an FAA certified UAS pilot.

Our Oregon Parks offer a wide range of recreational opportunities for so many. Obviously, not all these forms of recreation can coexist in the exact same place at the exact same time, and I applaud the park system's current approach to being fair to all those who want to recreate in our parks.

I realize not all people like drones and feel their presence impedes on their personal objectives for visiting a park. I can also say the same for many other forms of recreation like horseback riding, cycling, RV camping, etc. However, I see these forms of recreation co-existing today.

I do not advocate unfettered access for drone pilots in the Oregon State Parks. There are many parts of our parks that should be off limits to drones due to wildlife habitat, sensitive areas for humans, safety and general recreational separation. However, this does not mean a total ban on drones, or highly restrictive policies that prevent recreational flying. There is a middle ground here.

I highly encourage the Oregon State Parks to consider and implement a drone policy that allows coexistence of all these various forms of recreation. This broadens the appeal of our parks as being inviting, and not restrictive to all those who want to respectfully enjoy the unique features and beauty of our fantastic park system. Again, thank you for allowing me to provide input.

Roger Joys



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Tuesday, February 22, 2022

**Commenter name (if provided):**

Darryll DeCoster

**Commenter email (if provided):**

darryll@perubique.com

**Public comment:**

It is important to keep in mind that there is a growing community of drone pilots that are producing high quality content for both personal and professional use. Having clear, well communicated and thoughtful rules that can adequately address the majority of the people visiting Oregons Parks is a must. Having specific take-off and landing zones would be helpful for a variety of reasons. It makes it clear where these pilots can lawfully start and end operations of their crafts, while also providing a spot to help communicate what the flight rules are for the area. These take-off and landing zones should have a clear line of sight to where the drones are allowed to fly, hours of operation and weather conditions. It would also be helpful to have a series of video sessions that explain what the rules are, where these zones could be located and what being allowed to fly drones means and what it does not.

These types of rules are mandatory in order to allow drone pilots to enjoy their craft as well as keeping any disruption to a minimum and to create a safe area for pilots that is separate from the general public.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Tuesday, February 22, 2022

**Commenter name (if provided):**

Fred Causer

**Commenter email (if provided):**

fredcauserjr@gmail.com

**Public comment:**

Drones are already regulated by the FAA . I believe this is ridiculous.





# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Tuesday, February 22, 2022

## Commenter name (if provided):

Dylan Feral-McWhirter

## Commenter email (if provided):

dfmcwhir@gmail.com

## Public comment:

I would like to voice my support for the proposed rules on drone take-offs and landings in state parks.

As both a recreational and part 107 licensed drone pilot I feel it is important for these public spaces to remain open for drone activities by default except where there are legitimate and proven reasons to close them (ie specific wildlife habitats). I feel that most of the people commenting trying to keep drones out of state parks are doing it because it MIGHT diminish the enjoyment of their chosen hobby/use of the state parks. It would be unreasonable in my opinion to prioritize some peoples chosen method of enjoying the state parks over others such as myself. Honestly there a lot of ways that other people use our state parks that may diminish my enjoyment (horseback riders, kites on the beaches, loud groups of people, etc), but it is something that we all just have to deal with. I really think that we can all be civil and use common sense to allow everybody to enjoy these beautiful places.

I also don't think I have heard a specific argument siting drone takeoffs and landings as an issue, which is all that this rule should be addressing. Most people who are against drone usage in the state parks seem to be concerned about them flying around. As such, they should address that to the FAA who has power of that activity. While preventing take offs and landings may accomplish the goal that some people have of prevent drones from flying "in" state parks, it may not as well. There are lots places where I could take off from a public place outside the park and then fly a fairly far distance over ("into") the park while following FAA rules. I have to admit that if the default rule for state parks was "no drone takeoff and landing unless specifically allowed" and I was near a park that hadn't specifically allowed them, I would assume that drone use just hadn't been evaluated at that location yet. In that circumstance I would be more likely to try to find a place where I could take off from non-state park property but still fly over the park per the FAA to get any pictures/views I wanted. Whereas if the proposed rules go into effect and I came to a state park that disallowed drone takeoffs and landings I would assume there was good reasons for it and avoid flying over the park altogether.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Tuesday, February 22, 2022

**Commenter name (if provided):**

Ryan Jones

**Commenter email (if provided):**

ryansjones@hotmail.com

**Public comment:**

Personally, I think a mixed approach might be a possibility for Oregon State Parks and beaches, where drones are allowed at some places where other places can have restrictions where needed. I actually live in Washington State and the state parks here actually do have bans in place on drones and one has to get a permit to fly drones in the Washington State parks, though wdfw areas and game boat are usually fair game as far as I can tell. Even some of the county parks here in Washington (like the Snohomish County Parks) have bans on drones. In Oregon is a unique situation where there currently no blanket bans in place on drones in the state parks or beaches. And being a mavic mini drone pilot myself, I get it. There are going to be the idiot drone pilots out there that make everyone else look bad. On the other extreme, there are going to be the drone haters out there, who if they had their way, drones would be outright banned and limited to say rc fields and backyards. I am not going to be familiar with all of the parks and areas in Oregon, but I am sure every park, beach and public area is going to be different. Sure I'd be leery about flying drones at busy campgrounds or on beaches where there are alot of people around (think like Seaside, Canon Beach, or Astoria during say the warm summer months when there are going to be more people around). On the other hand, I don't support blanket bans either as I am sure there are going to be smaller and less populated beaches where people probably can get away with flying drones (aside from sensitive areas along with wilderness areas or other places where there are flight restrictions already in place). Perhaps education can be good there, like where are alot of marine wildlife around and other sensitive areas. Every park and public area is going to be different and some places might be better suited for drone flying than others. Can probably vary by season too (for example beaches are usually going to be busier during the summer months and way less busy during the winter months for example). For Smith Rock, perhaps it might be good to restrict drone flying during times of year when it is most busy as well as when the birds of prey are most active. But perhaps they can be allowed off season when there are less people around and birds are less active. Also, if you are going to designate flying areas for drones, they should be defined and reasonable. Perhaps areas where there are alot of complaints on drone flying can have some reasonable restrictions in place. Also, some people (like myself) are going to fly as hobbyists while there are going to be those who fly as part 107 pilots. Liked the Cline Falls area as it is mainly just a viewpoint area and I didn't have any issues flying my drone there last year. Other good places for flying could include the warm springs boat launch area when it is not being used, public fields when they are not being used, view point areas (like the viewpoint of the Sisters Volcano along highway 20 between Bend and Sisters), blm lands within reason and others. Sure there are going to be sensitive areas and areas where people want peace and quiet too. If there are going to be restrictions on drones, they should be reasonable and perhaps a balanced

approach can work. If permits are going to be needed for drone flying, the permit process will need to be affordable and straight forward. That is my opinion on the matter. I am sure every park and area is going to be different and some places are going to be better for drone flying than others, and vice versa is also true. perhaps varying the rules by park and beach might be a good approach. Also, perhaps there could be variants in the rules based on time of year such as allowing drone flying in off season on the beaches when there are less people around or at smaller beaches that are less busy. Of course, where drones are prohibited, would be good to put up some no drone zone signs so that people know what places to avoid, otherwise people might not know about the restrictions. And I do know that some governments will just ban drone flying altogether, seen that happen here in Washington (such as Snohomish County Parks, Seattle, Bellevue, Redmond, etc), but I don't support blanket bans. I am sure that there are going to be some approaches that work for almost everyone.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Monday, February 21, 2022

**Commenter name (if provided):**

Ryan Ropers

**Commenter email (if provided):**

r2droneimages@gmail.com

**Public comment:**

As a drone pilot, and frequent visitor to Oregon. I support the positive rule changes for drone pilots. Being a licensed drone pilot, I have no interest in flying over campgrounds, or populated areas. Oregon has a beautiful coastline, and the images I've gotten from the coast are amazing! Flying a drone is a great recreational experience! I have been able to share locations and images of many places. It's a great way to share a new perspective of an area!



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Monday, February 21, 2022

**Commenter name (if provided):**

Jacob Westlake

**Commenter email (if provided):**

jacob.westlake@aol.com

**Public comment:**

With lawn maintenance of the campground, any mower is going to be far noisier than any drone taking off, in the air or coming down to land. Many people bring cameras to have something to use to take memorable photos and drones are another form of taking pictures/video, it gives a whole new perspective. Most people may be using a DJI brand drone with have safety measures such as obstacle avoidance sensors, (we trust sensors with our lives with TESLA, vehicle blind spots) a top of the line drone manufacturer should be no different in trust in terms of working if and when needed. Please allow drone operators to take memorable photos and video of their time at the park.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Sunday, February 20, 2022

**Commenter name (if provided):**

John Klupar

**Commenter email (if provided):**

klup@outlook.com

**Public comment:**

Without any information regarding the number of complaints that the Oregon State Parks receive its hard for me to see that this is a required regulation. I haven't seen any issues. I've just never seen an issue in the parks.1. How the rule is implemented is everything. The current text could be implemented as a complete prohibition of all take off and landings. Or it could be a reasonable balance of all users of the state parks needs. It is really hard to anticipate how open the parks will be with their permission. It's really hard to give feedback not knowing what the goal of the park managers are.2. Having an open line of communication with Park Managers regarding when requests are denied may help the rules be more enforceable. For instance "Area X is off limits due to ecological sensitive areas" or "campgrounds are off limits for safety and general quality use of the area by all park goer ". Not getting that feedback will be a challenge for the pilots. It would be key to the rules success. Helping manage all park goers expectation.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Sunday, February 20, 2022

## Commenter name (if provided):

Norbert Norton

## Commenter email (if provided):

nada@nada.net

## Public comment:

The newly proposed rules regarding the use of drones in Oregon state parks miss the mark. The majority of Oregon state parks have never adopted regulations regarding drones. Drone use in the parks has been and continues to be conducted in reasonable and mostly void of complaint as evidenced by the lack of records in FOIA requests. Moreover, the two state parks that do maintain some measure of drone prohibition have done so not for the sake of reducing complaints or resolving actual incidents, but instead arbitrarily added the regulations on two unfounded beliefs: safety concerns and disruption to sensitive habitats. Let's address those misconception with immediacy.

Drones have been in circulation since 2013. The number of safety incidents relate to drones worldwide has been miniscule. The handful of serious injuries from drone accidents have made national and international news because of their extreme rarity and absolutely none have taken place in an Oregon state park or even within the state of Oregon. Any argument of drones being a threat to personal safety is maliciously overblown conjecture. The OPRD would be better served restricting the carriage of a knives as there have been documented incidents of injuries on OPRD lands over the same course of time. The same can be offered in regards to the disruption of sensitive habitats. Where the OPRD rule-making committee offered up concerns about the nesting of birds, Oregon state law as well as Federal acts and regulations already provide more than adequate regulation to educate all users (drone or otherwise) and prosecute those who disrupt or harass wildlife regardless of the way or tools they use in doing such. This similarly applies to protection of the grounds. Drafting regulations prohibiting of drones that isn't inclusive of all means (foot traffic, bikes, pets, golf clubs, etc.) is pointedly showing an anti-drone agenda rather than a concern for the environment. The regulation is akin to prohibiting the use of picnic areas in a park by those who have napkins in their picnic baskets for fear that they might litter.

What has become perfectly clear is that the OPRD is interested in making regulations for the sake of making regulation and are driven by invalid perceptions about drones, their use, and their environment impacts. Moreover, the regulations proposed are superfluous. Again, both state and federal law already have statutes and acts that can be used against bad actors. OPRD already has the authority to police both drone operators and any average Jane or Joe for disruption to habitats, causing safety concerns with other park guests, impeding park employees, or other criminal mischief. Attempting to write an additional regulation to cover the use of a drone in those already illegal events doesn't aid in policing or prosecution. It instead is like creating a park rule that disallows armed robbery on park property and expecting that the park rule enhances the already

existing state laws covering the very same criminal act.

With this said, what is the best way forward in creating new regulation that helps to ensure that Oregon's state parks continue to be havens for recreation, sport, adventure, solace, natural beauty, environmental study, and tourism? Stop focusing on the tool and instead focus on the behavior. There isn't a need to ban an area for launch / landing of a drone. Your need is to express that visitors shall not knowingly place the personal safety of others at risk. There isn't need to identify "drone" or "bow knife" or "trip wire". Specifying an instrument doesn't create a better rule, it displays an agenda. Skip doubling / tripling up on already existing state and federal regulations by simply working a regulation that defers to those existing statutes: Visitors will abide by all state and federal regulations that prohibit the disruption or harassment of wildlife. There is no need to detail the tool (drone, knife, lasso, spotlights) as to how that disruption or harassment takes place. You can do better and revisit this set of proposed regulations.





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Sunday, February 20, 2022

**Commenter name (if provided):**

Jonathan MacKnight

**Commenter email (if provided):**

jon.macknight@icloud.com

**Public comment:**

Hello, As an FAA Part 107 Certified UAV operator, I would be remiss if I did not gesture to the near impeccable safety records of drones as a whole. After light research I have found zero instances of fatalities resulting from hobby UAV drone use, in the USA or elsewhere. Further more, with the rules as they are, it makes Oregon an attractive place for tourists who themselves fly drones, to visit and spend their tourist dollars. I come to fly my drone, and spend \$3-4,000 not including air fare to do so. I don't want to stop coming. A reasonable middle ground would be annual permits issued and day permits at 70% the cost of annual. Yearly permits of \$100.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Sunday, February 20, 2022

**Commenter name (if provided):**

Neal Dunbar

**Commenter email (if provided):**

nealdunbar@yahoo.com

**Public comment:**

The less drone activity above our parks and beaches the better. Please be as restrictive as possible.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Sunday, February 20, 2022

**Commenter name (if provided):**

Mike Cassidy

**Commenter email (if provided):**

cassidyn3555l@gmail.com

**Public comment:**

If public Drone operations necessitate regulation at the state level of government, the Oregon Department of Aviation (ODA) should act as the regulatory agency. They should have an enforcement agreement with local and federal law enforcement agencies should the public violate state or federal statutes. Drone operations are already governed by the Federal Aviation Administration currently and it makes the most sense to keep aviation activities governed by aviation agencies. In order to maintain continuity and industry appropriate regulation and enforcement. There should be a collaborate agreement between the FAA, ODA, and any other state or local agencies to establish any new regulations pertaining to drone operations inside the state of Oregon and especially on public lands.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Sunday, February 20, 2022

**Commenter name (if provided):**

Ken Erich

**Commenter email (if provided):**

kelrich@comcast.net

**Public comment:**

Trying to restrict drone use in parks is unconstitutional both my state and National. No sub division, may not supersede the state or National constitution. What your proposing is a fly in to force the citizens to burden the cost of a law suite for the government officials ignorance of their own laws.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Saturday, February 19, 2022

**Commenter name (if provided):**

Erik Suring

**Commenter email (if provided):**

fsejs@yahoo.com

**Public comment:**

I am a recreational drone pilot. The Oregon coast can be a great place to fly, and I believe there are many places it can be done responsibly. I have flown responsibly away from campgrounds while staying at state park campgrounds. I think it would be useful to have a published map of where flights are allowed, and I hope the maps will not be restrictive. I have a question: how will UAS take off/landing prohibition zones effect hang-gliding or parasailing operations? Is it likely that prohibition zones might include currently used hang-gliding or parasailing landing areas? Thank you, Erik



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Saturday, February 19, 2022

## Commenter name (if provided):

Ryan Latourette

## Commenter email (if provided):

latourette@comcast.net

## Public comment:

The newly proposed OPRD Drone Take-off and Landing rules are fatally flawed, near-sighted, and are taking a stab at correcting an issue that as yet hasn't existed. I would very much urge reconsideration of the proposal based on the details I will provide below. Foremost, the creation of areas restricting certain zones from the landing of UAS inevitably is preempted by Federal regulation. The US Congress designated sole jurisdiction of airspace and the regulation of aircraft flight rules to the FAA. The FAA in turn recognized that in-flight emergencies can and do take place. When dealing with in-flight emergencies, aircraft operators are afforded a suspension of regulations to help ensure the safe landing of the aircraft. This is why from time to time you will see aircraft landing on a highway, parking lot, or other area in which aircraft are otherwise not permitted. The very same applies to UAS as is hinted at in § 107.21 In-flight Emergency. The National Traffic Safety Board has affirmed that UAS are aircraft as well. Landing a UAS anywhere during an in-flight emergency is expressly permitted and would thereby preempt your regulation. Next, we must observe that UAS regulations are quickly being amended and that land use jurisdiction trying to play catch up can be seriously impacted. As you focus today on restricting locations for drone use, there must also be an understanding that your preventions are defeated by the limits of your authority. Preventing the take-offs and landings in a specific area does not equate to fencing off the area for flight, including flight at just feet or inches off the ground for which you are attempting cessation. With the jurisdiction of airspace solely in the purview of the FAA, an UAS launch just inches outside your specified zone would legally be allowed to traverse the land use restricted area. The restriction is further constrained with the FAA's easing of visual line of sight regulations for UAS which will be happening shortly. Congress mandated in 2012 that the FAA establish multiple UAS test sites across the nation to devise means for UAS to safely fly beyond visual line of sight. Most of those test centers have been actively working on the solution and are ready to have the introduction of BVLOS flight start taking place without Part 107 waiver. The FAA has committed to such easing after the final go live of their newest Remote Identification regulations which happen in September of 2023. With those BVLOS operations cleared for flight, UAS operators will be capable of standing entirely outside the boundaries of the park, even more than miles away, and operate an UAS in the airspace feet off the ground in areas you might designate as no take-off or landing zones. The operations essential not only defeat the purpose, but also place OPRD in a precarious position in attempting to police the restricted activity for those zones. Finally, OPRD has not articulated any actual prevalence of problematic UAS activity prompting such interests to impose restrictions. I will note here that UAS are the safest aircraft in the skies, bar none. Where rotorcraft (helicopters) in the United States alone have an average of 20 fatalities annually, the same cannot be said of UAS. Globally the last fatality due to a non-military

UAS was in 2013 – and the fatality in that case was to the UAS' own operator. I very highly suspect that the OPRD has few, if any, actual encounters that relate to the interests of the draft rule. As such I've written a FOIA request seeking such documentation to confirm my suspicions; I might suggest reviewing such records to match the perceived need with the actual data points. This includes suggestions that birds and other wildlife are disturbed by drones. There are great misconceptions and a significant lack of worthwhile scientific studies of drone and bird or animal interactions. The notion that drones are loud is absurd. Drones produce far fewer decibels than your standard lawn mower.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Saturday, February 19, 2022

**Commenter name (if provided):**

Antonio Avila

**Commenter email (if provided):**

antonioavila77@yahoo.com

**Public comment:**

Honestly, people go to the beach and state parks to relax in nature. There is nothing relaxing about having a drone flying all over the place. Where are people supposed to go in order to have some peace and quiet? Also, as another commentator said, how are we going to deal with the drone when it crashes into haystack rock in Cannon Beach, or into any other protected area? Will the remnants of the drone be left there among all of the animals for them to eat more plastic?





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Saturday, February 19, 2022

**Commenter name (if provided):**

James Cowan

**Commenter email (if provided):**

jamescowan24@gmail.com

**Public comment:**

I support allowing more opportunity for drone usage in state parks. Drone flight is an enjoyable, relaxing and growing hobby.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, February 18, 2022

**Commenter name (if provided):**

Ritter Friedrich

**Commenter email (if provided):**

RitterF@outlook.com

**Public comment:**

Please don't limit a hobby I care very much for, FPV drone flying has got me out to enjoy the beauty of Oregon that my Old arthritic knees would never allow. Much safer and more cost effective or resource intensive as Skiing or OHV. FPV flying is a skill development hobby with unknown future growth. limiting access to high tech growing industries is only going to hurt Oregonians who may pursue a career in Drone piloting. It would be nice if there were identified Drone Friendly parks and very inexpensive Furniture to make drone flying more enjoyable. this could be artwork that is designed to be flown through or "Gates" to fly through. it could be very natural. Please expand the FPV drone Hobby in the state.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, February 18, 2022

**Commenter name (if provided):**

Francis Gilbert

**Commenter email (if provided):**

fsgilbert@msn.com

**Public comment:**

UAVs are a useful tool for monitoring and studying wildlife. Like any tool, however, UAV's can be misused, causing harm. The OPRD Drone Take-off and landing rules is sensitive to the needs of both UAV pilots and wildlife. I support its implementation. The scientific journal Current Biology published a code of best practice which seeks to mitigate or alleviate potential UAV disturbance to wildlife. It advocates the precautionary principle in lieu of sufficient evidence, encouraging researchers to recognize that wildlife responses are varied, can be hard to detect and could have severe consequences.

Similarly, the OPRD rules are regulations that mitigate or alleviate potential UAV disturbance of wildlife. The proposed regulations assure that the UAV community knows what is necessary to be responsible operators.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Friday, February 18, 2022

**Commenter name (if provided):**

Joy Kimbrough

**Commenter email (if provided):**

joyofthekimbroughs@gmail.com

**Public comment:**

Hi, I wanted to put in my comments about possibly prohibiting drones from certain areas. I personally do not see the need to prohibit them. We spend a lot of our time at state parks, on trails, lakes and rivers so we get to see a good amount of drone enthusiasts. We love waving to them overhead! I have never had a drone come close to us or make us feel like we are being watched/privacy invaded. Also, drones are very spendy, the farther they go the more expensive usually and most of the people I know like to keep their drones safe so they fly in safe areas where their drone will not fall and mess with wildlife/fauna . I know that during the horrible pandemic we watched a lot of videos from drones flying around other countries and landmarks. It was pretty awesome and we looked forward to the experience that they provided. I hope we will get to see them come free still! Thank you!



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Friday, February 18, 2022

**Commenter name (if provided):**

Steven Lay

**Commenter email (if provided):**

shjmlay@ykw.net

**Public comment:**

Drones can be harmful to user experience and to wildlife. In some cases they can have safety concerns too. Regarding the park user experience, drones make noise. If people are going out into the park to enjoy the quiet from human noise and to appreciate the sounds of nature, drone noise degrades the experience. Drones can endanger wildlife, especially nesting birds. Drones may flush parent birds from nests and leave eggs and juveniles exposed to the elements and to predators. Some species may even be directly harmed by a drone while attempting to defend their nest. Drones can present a danger to park users. Sometimes they fall, and sometimes inexperienced drone pilots lose control. This is especially concerning in busy parks like Silver Falls and Smith Rock.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Friday, February 18, 2022

**Commenter name (if provided):**

Vic Moss

**Commenter email (if provided):**

vic@mossphotography.biz

**Public comment:**

Good morning. First, thank you very much for changing the drone rules to allow reasonable recreational drone use in Oregon State Parks. These parks have beautiful scenery, and just like people with ground cameras, many people use drones to take those photos for their personal enjoyment and to capture memories. If drones are restricted to approved areas, that opportunity is gone. That would be like prohibiting someone from using the phone to take photos except in designated areas.

So by designating non-drone areas (as there should be), you've opened up much more area for us to fly and take photos from. Drone should not be used in crowded areas (parking lots, campgrounds, etc.) and should have seasonal closing for nesting and such. But by allowing to fly everywhere else (within FAA regulations of course), you've developed a very fair and equitable system for all to enjoy your parks. While I am not a citizen of Oregon, I do travel and am looking forward to bringing my drone on my next visit there. Or being able to go out and relax with my drone if I'm there on a business trip.

I live in Colorado, where drones are prohibited in State Parks. I'm looking forward to seeing how this system works for your parks, so I can use it as an example if our parks. Thank you again for crafting such reasonable rules. The drone community truly appreciates your work in this.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, February 17, 2022

**Commenter name (if provided):**

Russell Cooper

**Commenter email (if provided):**

coopersurf1226@gmail.com

**Public comment:**

Drones should definitely be restricted to areas where wildlife cannot be harassed or bothered by these devices. Nor should they be allowed to fly over or endanger people. Crashing a drone and hurting humans or animals should result in a fine. There is also the issue of noise pollution. The noise from a drone can be very disconcerting. It should not be allowed to disturb people or wildlife with its noise. Reducing and eliminating non natural noise should be a goal of drone flights.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, February 17, 2022

**Commenter name (if provided):**

David Lee

**Commenter email (if provided):**

dlee.pilot@gmail.com

**Public comment:**

I urge you to carefully consider the ramifications of allowing even limited UAS operations from state parks, especially along the coasts. As you know, these areas are home to sensitive populations of wildlife, as well as being quite crowded. Adding unmonitored drone operations to this mix will have a drastic impact on wildlife and the public's ability to enjoy Oregon's public beaches. I say this as a licensed airline transport pilot and a commercial UAS operator: the unfortunate reality is that the drone pilot community is immature, irresponsible, and over-confident in not only their abilities but also the consumer-grade technology they're operating. Without the oversight of aviation safety professionals I have little confidence they will choose to operate safely and responsibly in some of Oregon's most vulnerable and scenic areas. Please also note that an advocacy group called the DSPA has put out a nationwide call for drone pilots to sway you with comments — doubtless largely from non-residents who will never experience the harm they will do.





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, February 17, 2022

**Commenter name (if provided):**

Beth Morey

**Commenter email (if provided):**

lawlibn@gmail.com

**Public comment:**

I would like to see drone operation limited in state parks, particularly in more remote areas. Many of us enjoy hiking, backpacking, camping and other activities on state park land to enjoy nature without the persistent noise of buzzing drones. It's becoming increasingly difficult to find places to get away from this kind of technology. State parks should remain a place we can do so.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, February 17, 2022

**Commenter name (if provided):**

mark lorincz

**Commenter email (if provided):**

malorincz@yahoo.com

**Public comment:**

I think drones have no place in state parks, especially along the beach. I have seen people flying them and literally trying to harass osprey and eagles at Sunset Bay State park. Its nice to have area free of mechanical pollution. The only use I can see that justifies the annoyance of them is for search and rescue and lifeguarding. Thanks



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, February 17, 2022

**Commenter name (if provided):**

Wendy Zieker

**Commenter email (if provided):**

serial.fries0o@icloud.com

**Public comment:**

Please do not allow the take off and landing of drones in Silver falls park. Also the coast area. Please let wildlife have some peace . Please let park visitors not be dealing with taking off and landing of drones,



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, February 17, 2022

**Commenter name (if provided):**

C. Kerby

**Commenter email (if provided):**

visi.cindy@gmail.com

**Public comment:**

As someone that does not fly a drone, but has been around them and the people that do fly them, drones should be allowed in public areas and on the beach. The footage these drones gets not only show how beautiful our state is, but also can help with land surveying, shifting in land, plant identification and invasive species etc. I do not promote the idea of people flying them in heavily populated camping areas, but in the open parks and on the beach, let them fly.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, February 17, 2022

**Commenter name (if provided):**

Willaim Castell

**Commenter email (if provided):**

wtcastell@me.com

**Public comment:**

I prize the quiet & solitude of public lands, upon which drones intrude. I hope drones will be excluded.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, February 17, 2022

**Commenter name (if provided):**

Jade and Alex Sharpe

**Commenter email (if provided):**

jadealexsharpe@protonmail.com

**Public comment:**

Drones should not be allowed in any Oregon parks or beaches. They are extremely disruptive to wildlife, who already have extremely reduced habitats and stressors from off-leash dogs, people, etc. Also, drones are just creepy - why do we need to be video'd and followed by some random person just because we went to the beach/park? Not really cool or safe for those that have been stalked and threatened in the past. NO DRONES!



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, February 17, 2022

**Commenter name (if provided):**

Julie Stefanelli

**Commenter email (if provided):**

jasblu2016@gmail.com

**Public comment:**

Drones should not be allowed at all in state parks. They disturb wildlife and can be dangerous to both wildlife and humans. They are noisy and invasive. Please do not allow them in state parks at all!



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Thursday, February 17, 2022

## Commenter name (if provided):

Tj Saunders

## Commenter email (if provided):

gtesaunders@gmail.com

## Public comment:

My name is Tj Saunders, Oregon born and raised. I grew up with my grandparents Volunteering as Oregon State Park Hosts during my childhood. I have utmost respect for our State Parks and the wildlife with whom we share our land. I am a hobbyist and a certified Small Unmanned Aircraft (SUAS / Drone) Pilot under the FAA and I also operate under my Oregon based LLC. I am seeing this rule as showing positive and negative sides to it. Positive: - Public being aware of where drones may be taking off and landing.- Unexperienced hobbyist pilots knowing where a safe area may be to fly without risking damage to their Drone.Negative:- Experienced hobbyist and professional pilots such as myself being limited to where we are permitted to fly while doing so in a safe and professional manner. I am concerned that while this ruling is being put into place the technical understanding of our hobby is may not be fully understood or considered. There are many different types of drones, some which fly more automatically that have auto hover functions, articulating camera's which do more in open sky and generally have a much longer flight time (10-30 minutes in the air on one battery). Then there are drones such as First Person View (FPV) drones which have a more intimate flying style and are operated manually without auto hover functions, operated safely closer/ within trees, around mountain slopes, and can be operated safely around people, that help give a totally different perspective of the beauty of the land, environment and object but at the sacrifice of a much shorter flight time ranging from 3-10 minutes. My concern here is that different types of drones and hobbyists may be tragically limited to where and how far we can fly if these required zones are made for liftoff/landing. We also need to put into consideration the fact of multiple pilots in one area. If I have to hike my equipment 10 miles to a fly location and have to wait 30minutes + because someone else is flying, or if I miss a sunset shot because there is no frequency space with the other pilot, what's the point? Generally rule of thumb drone pilots will have a Visual Observer (VO) and will always make sure the area is clear of people, as well as maintaining visual line of sight instead of solely relying on the flight camera to ensure the drone is safe of obstruction and clear of humans/animals. This is practiced mandatorily under FAA certified pilots, but myself being a part of the hobbyist community as well I can say it is also very commonly practiced. I would love to continue enjoying our state parks while being able to exercise my hobby and passion, without limitations as I operate my drone safely. I do feel that pilots need to fly responsibly and perhaps rules and regulations can be applied to pilots who wish to fly in our State Parks, and we can keep track of their information. We should consider creating a Pilots Permit, get the pilots information, FAA certification number if need be, and make them sign some paperwork so we know who is flying in our parks. Create documentation for a waiver process for pilots who wish to fly in a different area for one day for a project, charge them a fee, make them fill out paperwork..My major concern here is if there is only one area to lift off and land in a 1000+ acre



state park where we can only fly a 1-2 mile radius distance at max depending on Line of Sight and obstruction of Foliage, what is the point? Pilots will be getting the same footage/visuals over and over again and this will eliminate the possibility of endless creativity of piloting we have to offer and share with our state and the world. There are more safe and beautiful areas than can even be thought of for us to fly, and I would hate for that to be drastically limited because someone didn't think of it during the design process of this ruling. The community wants to share different perspectives of our states beautiful nature, its part of the creativity process of being a pilot and is a huge part of our hobby. People are coming here as Oregon residents as well as out of state to come here and fly because we have a different landscape than other states and even countries of the world. Wouldn't we like to sell more park passes and bring more funding to our parks? Or are we trying to limit a growing hobby and skillset and risk the possibility of people flying against the rules as vandals and potentially causing harm or trouble? If you put designated zones required for take off and land, what makes us think people will follow these rules and fly in other areas? I can see the ruling working in a general open grass park area like Stub Stuart has, but in more dense foliage filled areas or landscapes I doubt the ruling will be followed. I also feel Oregon State Parks should respect and recognize the different categories of UAS, under 250g, over 250g-55lbs, 55lbs+ recognized by the FAA. All in all, us pilots are trying to enjoy and share the beauty of our wonderful state and park give a different perspective to the land that humans couldn't normally see. We all need to educate ourselves and operate safely. I think we should create rules, guidelines and potentially implement documentation/records for pilots, without drastically limiting where we can fly. We have many options here, to make things work safely and for all of us to enjoy the parks.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, February 17, 2022

**Commenter name (if provided):**

Adonais Clark

**Commenter email (if provided):**

asktheclarks@msn.com

**Public comment:**

I strongly oppose the use of drones in state parks. They are annoying due to the noise they make and are an invasion of privacy as they will be used exclusively by people who want to take photos. Creepy and scary. People don't follow the rules on our roads, in planes, or in our national forests and parks. This will be no different. Who will be there to enforce the rules when people fly drones where they are not supposed to. The State Patrol or Parks Department. Really? People go to state parks to enjoy the natural scenery, not to watch a bunch of drones being flown by people who don't care about other people's experience and are simply interested in taking photos for their Instagram or Facebook account.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Thursday, February 17, 2022

**Commenter name (if provided):**

Carmen

**Commenter email (if provided):**

nale.carmen@gmail.com

**Public comment:**

The following emails describe one of my experiences with drones at Smith Rock harassing bald eagles and climbers, which includes Smith Rock State Parks response. It's important to note that Smith Rock is a safe haven for eagles and paradise for visitors. I understand that it's important that multiple recreation users are able to enjoy our state parks. However, I am concerned about the noise and use of drones at Smith Rock. I have had multiple personal experiences with drones following me while climbing and the noise scaring me while leading via traditional climbing. The noise is distracting while climbing to the point where I am afraid of falling and hurting myself due to the disruption in concentration. I am not sure what a good compromise is but maybe there could be clear communication to the public of drone edicate. The signs at Smith Rock are confusing when drones are allowed. I would also provide a visible phone number people can call to report any inappropriate drone use. I would recommend that drones maintain a certain distance away from climbers and clear that they are not allowed to harass wildlife. I am curious if drone users have a drone edicate similar to "no trace left behind" and "gym to crag."

**From:** [outlook\\_5FC358A53DAD9A88@outlook.com](mailto:outlook_5FC358A53DAD9A88@outlook.com) on behalf of [nale.carmen@gmail.com](mailto:nale.carmen@gmail.com)  
**To:** [PUBLICCOMMENT \\* OPRD](#)  
**Subject:** Public Comment on Drone Use at Smith Rock State Park  
**Date:** Wednesday, February 16, 2022 7:34:11 PM

---

The following emails describe one of my experiences with drones at Smith Rock harassing bald eagles and climbers, which includes Smith Rock State Parks response. It's important to note that Smith Rock is a safe haven for eagles and paradise for visitors. I understand that it's important that multiple recreation users are able to enjoy our state parks. However, I am concerned about the noise and use of drones at Smith Rock. I have had multiple personal experiences with drones following me while climbing and the noise scaring me while leading via traditional climbing. The noise is distracting while climbing to the point where I am afraid of falling and hurting myself due to the disruption in concentration. I am not sure what a good compromise is but maybe there could be clear communication to the public of drone edicate. The signs at Smith Rock are confusing when drones are allowed. I would also provide a visible phone number people can call to report any inappropriate drone use. I would recommend that drones maintain a certain distance away from climbers and clear that they are not allowed to harass wildlife.

I am curious if drone users have a drone edicate similar to "no trace left behind" and "gym to crag."

Carmen

----- Forwarded message -----

**From:**  
**Date:** Tue, Nov 19, 2019 at 9:32 AM  
**Subject:** Fwd: Question or comment about Smith Rock State Park via website  
**To:** Carmen

Begin forwarded message:

**From:** DAVEY Matthew \* OPRD <[Matthew.Davey@oregon.gov](mailto:Matthew.Davey@oregon.gov)>  
**Date:** November 18, 2019 at 11:41:25 AM PST  
**To:**  
**Cc:** INFO Park \* OPRD <[Park.Info@oregon.gov](mailto:Park.Info@oregon.gov)>, MEMMINGER Steve \* OPRD <[Steve.Memminger@oregon.gov](mailto:Steve.Memminger@oregon.gov)>  
**Subject:** Question or comment about Smith Rock State Park via website

Hi Carmen,

Thanks for taking the time to reach out to us about your experience at Smith Rock last weekend. Park rangers at Smith Rock often respond to visitor and/or natural resource conflicts arising from drone operators in the park when they are brought to our attention, and I'd highly encourage you to call our park office (**541-548-7501**) if you observe that happening again.

No permits for drone use where in effect last weekend. We do share the same concern about the wildlife being harassed by unconscientious drone operators, as well as, your own safety when climbing in the park. Please don't hesitate to reach out to us directly in the future, and we will do our best to make your visit as safe and enjoyable as possible.

Thanks again, and hope to see you back and enjoying the park.  
Matt

**Matt Davey** | Park Manager

---

Smith Rock State Park  
**Oregon Parks and Recreation Department**  
9241 NE Crooked River Dr. Terrebonne, OR 97760  
Work: 541-548-7501 ext. 1



Cell:

[Matthew.davey@oregon.gov](mailto:Matthew.davey@oregon.gov)

**From:**

**Sent:** Saturday, November 16, 2019 5:59 PM

**To:** [park.info@state.or.us](mailto:park.info@state.or.us)

**Subject:** Question or comment about Smith Rock State Park via website

**Question or comment from Carmen:**

I was climbing at Smith on November 16 near Rabbit Stew when I ran into a couple that was flying a drone. They said they had a permit which they all seem to say. They left then later that day we say a drone chasing after an adult bald eagle. Everyone at the crag was really upset and we couldn't find them to tell them to stop. Lately I keep seeing more people with drones and I am concern it's impacting the eagles and wildlife. It's also distracting and dangerous when climbing.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, February 17, 2022

**Commenter name (if provided):**

Bob Lyman

**Commenter email (if provided):**

boblyman@uoregon.edu

**Public comment:**

Allowing drones to take off and land inside state parks would help increase park attendance and also capture the park and its inhabitants from a unique angle.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Thursday, February 17, 2022

**Commenter name (if provided):**

Matt Christensen

**Commenter email (if provided):**

mattchristensen8@hotmail.com

**Public comment:**

Hi, In my opinion, drones are both an invasion of privacy and audible air space. They potentially only enhance the experience of the person flying the drone and negatively affect the experience of others in the general area. There is so much usage at Oregon State Parks so why do we need to allow and encourage loud aerial cameras?



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Wednesday, February 16, 2022

**Commenter name (if provided):**

Forest Menke-Thielman

**Commenter email (if provided):**

dforestation@gmail.com

**Public comment:**

As a climber, drones are incredibly irritating. They not only disturb the serenity of wilderness and distract me, but they do the same for wildlife. If Search and Rescue want to use them in an emergency (they generally don't), then they can, otherwise, get them out of my face. Thank you!





# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Wednesday, February 16, 2022

**Commenter name (if provided):**

Regis Krug

**Commenter email (if provided):**

hikerinoregon@gmail.com

**Public comment:**

Please prohibit, and enforce State Parks as no-fly zones for drones. They are a nuisance to other park visitors. I've had them flying directly over my head - less than 25' at Silver Falls State Park as well as at Multnomah Falls in the Gorge.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Wednesday, February 16, 2022

**Commenter name (if provided):**

Bonni Reeves

**Commenter email (if provided):**

johndoe1109@msn.com

**Public comment:**

Please do not allow drone interaction any where that horseback riding is already allowed on the beach or in the parks system. It is dangerous for horses and riders who might encounter drone activity as horses are flight animals and easily spooked causing injury to all riders, animals or nearby public Thank you for allowing input.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Wednesday, February 16, 2022

**Commenter name (if provided):**

Jill Narozny

**Commenter email (if provided):**

jinarozn@yahoo.com

**Public comment:**

Please do not allow drones over public parks. These areas should be a place to enjoy privacy, quiet, and nature. There should be consideration for the wildlife and birds also.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Wednesday, February 16, 2022

**Commenter name (if provided):**

Christina Dampier

**Commenter email (if provided):**

alaskamagic22@icloud.com

**Public comment:**

Dear Sir or Ma'am, My name is Christina (Myers) Dampier and I would like to voice my comments and opinion on allowing drones in State Parks and on the coast. I visited Shore Acres State Park last year and quite frankly the visit was severely hampered and ruined by a gentleman who was flying his drones over our heads. I am a disabled vet and this drone triggered me as well as being very disruptive and distracting to many of us that were attempting to enjoy the wonderful views. I urge you to make very clear and concise regulations banning these devices from areas that are meant for the public to experience the magnificence of these specific areas in Oregon. The fines for ignoring the possible future bans should be of a significant amount to deter regulation breakers. There are plenty of areas in Oregon where these can be flown without ruining other people's experience. Thank you for listening, Christina Dampier Resident of Oregon.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

Take-off and landing of drones

**Date comment received:**

Wednesday, February 16, 2022

**Commenter name (if provided):**

Mike Waller

**Commenter email (if provided):**

mwaller468@gmail.com

**Public comment:**

Simply put, there are already enough distractions in state parks without adding someone trying to "film" themselves for YouTube, TikTok, or what the app of the day is. I go to the state parks for peace, quiet, relaxation - not doing drones, or worrying about who is flying what above my campsite. So, I am against this concept.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

**Proposed rule change:**

**Take-off and landing of drones**

**Date comment received:**

Wednesday, February 16, 2022

**Commenter name (if provided):**

N. Eddy

**Public comment:**

As a photographer I appreciate the utility and fun of drones. However I feel they have no place in parks and public areas such as the beach. That includes take off, fly over and landing. Drones are motorized, invasive, distracting, a danger to wildlife, and generally incompatible with nature values. In many areas they would be nearly impossible to retrieve if they crash (trees, water, steep terrain, etc.). Also, parks and beaches attract people which drones are not supposed to fly over--a highly changeable situation for the operator or park staff to anticipate and control.



# Submit a public comment on a rule

Oregon Parks and Recreation Department

## Proposed rule change:

Take-off and landing of drones

## Date comment received:

Wednesday, February 16, 2022

## Commenter name (if provided):

Brooks Kline

## Commenter email (if provided):

brookskline@tarafain.com

## Public comment:

I can't speak to this issue as it pertains to the coast (because I don't live near the coast)--but I do live next to a state park. There are so few places left where the natural world is left even partially unmolested, and where there is even a hint of what used to be called "wild"--our state parks are one of those few places. People aren't allowed to dirt bike or ATV in the state park because of the disruptive effect on the animals, habitat, and other people coming to the park to find some solace from the man-made world. So why would we allow another invasive, loud, and peace-disturbing man-made device to buzz around our parks? The park I live next to (La Pine State Park) is a summer habitat for deer and a winter habitat for elk, and overall we have a massively declining cervid population in Central Oregon due to relentless human pressure--why would we increase that in one of the refuges animals have in this area? I am strongly against allowing any drone activity in the state parks, both for the benefit of the natural world and the people who come to the park to enjoy some time in the natural world.