



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

**Public comments received
Feb. 16 through Feb. 18, 2022**



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):

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.

Date comment received:

Friday, February 18, 2022



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):

N. Eddy

Commenter email (if provided):

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.

Date comment received:

Friday, February 18, 2022



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):

Mike Waller

Commenter email (if provided):

mwall468@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.

Date comment received:

Friday, February 18, 2022



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):

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 peoples experience.

Thank you for listening,

Christina Dampier

Resident of Oregon.

Date comment received:

Friday, February 18, 2022



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):

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.

Date comment received:

Friday, February 18, 2022



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):

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.

Date comment received:

Friday, February 18, 2022



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):

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.

Date comment received:

Friday, February 18, 2022



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):

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!

Date comment received:

Friday, February 18, 2022



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):

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?

Date comment received:

Friday, February 18, 2022



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):

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.

Date comment received:

Friday, February 18, 2022



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):

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."

Date comment received:

Friday, February 18, 2022

From: outlook_5FC358A53DAD9A88@outlook.com on behalf of 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>
Date: November 18, 2019 at 11:41:25 AM PST
To:
Cc: INFO Park * OPRD <Park.Info@oregon.gov>, MEMMINGER Steve * OPRD <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



Matthew.davey@oregon.gov

From:

Sent: Saturday, November 16, 2019 5:59 PM

To: 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

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.

Date comment received:

Friday, February 18, 2022



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):

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.

Date comment received:

Friday, February 18, 2022



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):

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!

Date comment received:

Friday, February 18, 2022



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):

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!

Date comment received:

Friday, February 18, 2022



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):

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.

Date comment received:

Friday, February 18, 2022



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):

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.

Date comment received:

Friday, February 18, 2022



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):

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,

Date comment received:

Friday, February 18, 2022



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):

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

Date comment received:

Friday, February 18, 2022



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):

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.

Date comment received:

Friday, February 18, 2022



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):

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.

Date comment received:

Friday, February 18, 2022



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):

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.

Date comment received:

Friday, February 18, 2022



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):

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.

Date comment received:

Friday, February 18, 2022



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):

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.

Date comment received:

Friday, February 18, 2022



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):

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!

Date comment received:

Friday, February 18, 2022