



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

**Public comments received
Feb. 19 through Feb. 28, 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):

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.

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):

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.

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):

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.

Date comment received:

Saturday, February 19, 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):

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?

Date comment received:

Saturday, February 19, 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):

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.

Date comment received:

Saturday, February 19, 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):

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

Date comment received:

Saturday, February 19, 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):

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.

Date comment received:

Sunday, February 20, 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 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.

Date comment received:

Sunday, February 20, 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):

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.

Date comment received:

Sunday, February 20, 2022



Submit a public comment on a rule

Oregon Parks and Recreation Department

Proposed rule change:

General comment or question

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.

Date comment received:

Sunday, February 20, 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):

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.

Date comment received:

Sunday, February 20, 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):

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.

Date comment received:

Sunday, February 20, 2022



Submit a public comment on a rule

Oregon Parks and Recreation Department

Proposed rule change:

General comment or question

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.

Date comment received:

Monday, February 21, 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):

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!

Date comment received:

Monday, February 21, 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):

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.

Date comment received:

Tuesday, February 22, 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):

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.

Date comment received:

Tuesday, February 22, 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):

Fred Causer

Commenter email (if provided):

fredcauserjr@gmail.com

Public comment:

Drones are already regulated by the FAA . I believe this is ridiculous.

Date comment received:

Tuesday, February 22, 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):

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 Oregon's 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.

Date comment received:

Tuesday, February 22, 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):

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

Date comment received:

Wednesday, February 23, 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):

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 alining 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,

Date comment received:

Wednesday, February 23, 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):

Karina Ramos

Commenter email (if provided):

kramosnava@icloud.com

Public comment:

They should be illegal because it disturbs someone experience and nature has well.

Date comment received:

Thursday, February 24, 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):

Commenter email (if provided):

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

Date comment received:

Thursday, February 24, 2022



Submit a public comment on a rule

Oregon Parks and Recreation Department

Proposed rule change:

General comment or question

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

Date comment received:

Thursday, February 24, 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):

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.

Date comment received:

Thursday, February 24, 2022



Submit a public comment on a rule

Oregon Parks and Recreation Department

Proposed rule change:

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.com

photocombobulate.com

Date comment received:

Thursday, February 24, 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):

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.

Date comment received:

Thursday, February 24, 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):

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.

Date comment received:

Thursday, February 24, 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):

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.

Date comment received:

Thursday, February 24, 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):

Max Tepfer

Commenter email (if provided):

mtepfer@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.

Date comment received:

Thursday, February 24, 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):

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.

Date comment received:

Thursday, February 24, 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):

Waverly Davis

Commenter email (if provided):

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

Date comment received:

Thursday, February 24, 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):

Quinn Rohlf

Commenter email (if provided):

qrhlf@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 multicopter 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.

Date comment received:

Thursday, February 24, 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):

Commenter email (if provided):

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?

Date comment received:

Thursday, February 24, 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):

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.

Date comment received:

Thursday, February 24, 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):

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.

Date comment received:

Thursday, February 24, 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):

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.

Date comment received:

Thursday, February 24, 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):

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.

Date comment received:

Thursday, February 24, 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):

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.

Date comment received:

Thursday, February 24, 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):

Colleen Baird

Commenter email (if provided):

cmbaird88@gmail.com

Public comment:

No drones in the parks please! They're awful

Date comment received:

Thursday, February 24, 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):

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.

Date comment received:

Thursday, February 24, 2022



Submit a public comment on a rule

Oregon Parks and Recreation Department

Proposed rule change:

General comment or question

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.

Date comment received:

Thursday, February 24, 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):

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.

Date comment received:

Thursday, February 24, 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):

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.

Date comment received:

Thursday, February 24, 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):

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.

Date comment received:

Thursday, February 24, 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):

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.

Date comment received:

Thursday, February 24, 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):

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.

Date comment received:

Thursday, February 24, 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):

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.

Date comment received:

Thursday, February 24, 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):

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

Date comment received:

Thursday, February 24, 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):

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!

Date comment received:

Thursday, February 24, 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):

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.

Date comment received:

Thursday, February 24, 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):

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.

Date comment received:

Thursday, February 24, 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):

Commenter email (if provided):

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.

Date comment received:

Thursday, February 24, 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):

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.

Date comment received:

Thursday, February 24, 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):

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.

Date comment received:

Thursday, February 24, 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):

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.

Date comment received:

Thursday, February 24, 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):

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.

Date comment received:

Thursday, February 24, 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):

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.

Date comment received:

Thursday, February 24, 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):

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.

Date comment received:

Thursday, February 24, 2022



Submit a public comment on a rule

Oregon Parks and Recreation Department

Proposed rule change:

General comment or question

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.

Date comment received:

Thursday, February 24, 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):

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.

Date comment received:

Thursday, February 24, 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):

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.

Date comment received:

Thursday, February 24, 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):

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.

Date comment received:

Thursday, February 24, 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):

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.

Date comment received:

Thursday, February 24, 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):

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

Date comment received:

Thursday, February 24, 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):

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.

Date comment received:

Thursday, February 24, 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):

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

Date comment received:

Thursday, February 24, 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):

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

Date comment received:

Monday, February 28, 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):

Commenter email (if provided):

Public comment:

No drones! They detract from the natural environment which we seek in these places.

Date comment received:

Friday, February 25, 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):

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.

Date comment received:

Friday, February 25, 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):

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.

Date comment received:

Friday, February 25, 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):

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.

Date comment received:

Friday, February 25, 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):

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.

Date comment received:

Friday, February 25, 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):

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.

Date comment received:

Friday, February 25, 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):

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.

Date comment received:

Friday, February 25, 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):

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.

Date comment received:

Friday, February 25, 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):

Sophie Avila

Commenter email (if provided):

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.

Date comment received:

Friday, February 25, 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):

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.

Date comment received:

Saturday, February 26, 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):

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 (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)

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 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.

Date comment received:

Saturday, February 26, 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):

Geoff Hance

Commenter email (if provided):

irongeoff3309@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

Date comment received:

Monday, February 28, 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):

Noreen Zupan

Commenter email (if provided):

noreenzupan@msn.com

Public comment:

Date comment received:

Monday, February 28, 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):

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

Date comment received:

Monday, February 28, 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):

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

Date comment received:

Monday, February 28, 2022

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)

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](#)

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↕ Rule Number	↕ Rule Title	↕ Chapter Name
736-010-0015	Definitions	Parks and Recreation Department
736-015-0040	Miscellaneous Rentals and Products	Parks and Recreation Department
736-040-0048	Wallowa River Scenic Waterway	Parks and Recreation Department
736-015-0006	Definitions	Parks and Recreation Department
736-015-0020	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

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

Date comment received:

Sunday, February 27, 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):

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.

Date comment received:

Sunday, February 27, 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 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 occasional 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

Date comment received:

Monday, February 28, 2022