



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

**Public comments received
March 1 through 4, 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):

Eric Hanscom

Commenter email (if provided):

eric@iciplaw.com

Public comment:

The Utah state park system has done an excellent job of allowing drones in certain parks to both raise revenue and allow drone flyers to promote the parks through their YouTube and Dronestagram pictures and videos. This proposal seems very reasonable and seems to balance recreational and environmental interests.

Date comment received:

Tuesday, March 1, 2022



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Oregon Parks and Recreation Department

Proposed rule change:

Take-off and landing of drones

Commenter name (if provided):

Jennifer Birdsong

Commenter email (if provided):

jbirdsong1@twu.edu

Public comment:

Properly trained drone pilots that adhere to the Federal Aviation Authority (FAA)'s rules know how to fly when to fly, when to land, and how to respect the privacy of others and the land. I have read many public comments that cite irresponsible drone pilot behavior, and I am in complete agreement with eradicating this type of drone pilot. If both hobbyist and professional drone pilots were trained and versed in proper park rules (i.e., where they are permitted to fly and where they are not allowed to fly), FAA guidance and regulations, and weather and safety protocols, everyone could enjoy the park. Drones are such a fantastic tool.

- A disabled person might use a drone to capture a view otherwise unavailable to them because they cannot hike a trail or scale a mountain.
- A photographer can hone a new skill, photographing nature.
- A Search and Rescue mission can gain valuable practice for a real task.

Please consider allowing drones the space to utilize your park for the many missions and many opportunities that drones provide.

Date comment received:

Tuesday, March 1, 2022



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Oregon Parks and Recreation Department

Proposed rule change:

Take-off and landing of drones

Commenter name (if provided):

Wood Sabold

Commenter email (if provided):

photowood@mycomspan.com

Public comment:

There should be no place for mechanized drones on state beaches or any state park. Parks and Beaches should be enjoyed without distracting noises.

Date comment received:

Tuesday, March 1, 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):

Carolyn White

Commenter email (if provided):

mcwhite_7@verizon.net

Public comment:

I am in support of the OPRD rules guiding the take-off and landing of drones in Oregon state parks and along the ocean shore. As a FAA Part 107 certified sUAS pilot, I am entrusted to uphold, promote and maintain my sUAS flights in a professional manner. Paramount to designing one's flight maneuvers is the safety of the flight field environment. Upon reviewing the OPRD additional rule sections, the park departments are working collaboratively to ensure that designated and appropriate zones are delineated for safe drone take-off and landing zones.

Drone pilots are readily utilizing apps to submit flight plans directly to the FAA for approval of flights which are guided by the aerial and geographic boundaries set in place through our LAANC system. Adding the versatility of the appropriate drone take-off and landing zones within the Oregon state parks and along the ocean shore is feasible with the monitoring and regulations as proposed.

Date comment received:

Tuesday, March 1, 2022



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Oregon Parks and Recreation Department

Proposed rule change:

Take-off and landing of drones

Commenter name (if provided):

Michael Mooney

Commenter email (if provided):

mmooneyor@me.com

Public comment:

I fully support the creation of rules to limit use of drones as proposed.

I suggest whatever means you use to communicate these new rules also repeat the existing State and Federal (FAA) rules prohibiting Drones below certain altitudes and in certain airspace.

What are the proposed enforcement and penalties for violating these new rules?

Drones have quickly become a nuisance to wildlife and outdoor enthusiasts. In much more serious cases they have posed an immediate danger to aircraft involved in fire fighting and aircraft operations around airports.

Drones use has skyrocketed as they have become very cheap and some of those operating them do so range from being completely oblivious to rules to fully intending to do harm. The military has invested considerable resources to combat this threat so this is Oregon State's opportunity to get this done in an effective manner the first time.

Regards,

Michael Mooney

Turner, OR

Date comment received:

Tuesday, March 1, 2022



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Oregon Parks and Recreation Department

Proposed rule change:

Take-off and landing of drones

Commenter name (if provided):

Roger Webb

Commenter email (if provided):

webb.roger@gmail.com

Public comment:

Greetings,

My name is Roger Webb and I am an FAA licensed remote pilot and UAS operator. I am opposed to all but the most limited restrictions on flying within state parks, and in particular, along State beaches, waterways and other public areas. While I am sympathetic to issues regarding noise, privacy, environmental and animal protection and security of sensitive areas, these needs can be met without the proliferation of blanketed ban areas.

At the end of the day, we, as pilots, have already been asked to take on a lot. We learn the radio, air traffic control systems and airspace, weather and a litany of regulations, which I find reasonable. We are already prohibited from flying over people. We are required to register our drones, carry a license and receive regular, updated, training from the FAA every 2 years. We are now being asked to equip our craft with strobes and transponders. If we're going to do all of this, and comply, at the very least we should have the privilege, as it were, the right I'd rather say, to fly on our public land.

If we are going to erect No Drone Zones, there should be ample days and times per year, during times of good weather, where the limitation is restricted and we're free to photograph areas of significance (like historic sites) and get some time set aside to enjoy the public land that we also pay for. Any Drone Free Zone should come with Come Fly Days where the restrictions are lifted or reduced to the lowest reasonable level.

For campgrounds, there are already quiet times and noise controls in place at night, and there's no problem with drone flyers being subjected to the same, while still being able to capture a nice view of the family campsite, being able to take group photos and capture the scenery of the area. When flying outside of your personal campsite, reasonable height restrictions could be in place allowing flight above 50 or 100ft, which would limit prop noise, improve privacy and still allow legitimate photography activity to take place.

For beaches, there are myriad reasons why blanket prohibiting drone use is a bad idea. You're limiting some of the most widespread, open air areas for beginning pilots to practice. With the noise of wind and waves, and people playing music, the drone prop noise is of minimal concern here. And when we're talking about beaches, we're talking about miles of open space on land that's as much ours as anyone else who are free to drive, run with their dogs, or play loud music, all of which I find annoying but won't ask to have banned out of a sense of mutual respect for others

who may wish to enjoy the environment in their own way. If it bothers me that much, I'll move a few dozen yards down the sand.

All this said, I still sympathize with the need for quiet and privacy in enjoying our parks. I am not completely opposed to restricting flight, but it needs to be done on an individual basis, for each area, with sufficient input and due regard to the flying community. We pay our taxes, park fees, and follow the many regulations imposed to obtain our privilege to fly. We demand the right to be able to execute it, and on the public land that we've helped pay for.

Thank you for your time,

Roger Webb

Dayton, OR

Date comment received:

Tuesday, March 1, 2022



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Oregon Parks and Recreation Department

Proposed rule change:

Take-off and landing of drones

Commenter name (if provided):

Tom Egan

Commenter email (if provided):

mtnarete@msn.com

Public comment:

I am against drones at smith rocks, it is a violation of my privacy,,, they are frequent during raptor nesting,,, and are annoying

Date comment received:

Tuesday, March 1, 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):

Tom Kelly

Commenter email (if provided):

backpackersk@gmail.com

Public comment:

I support the new drone regulations and hope they are strongly enforced. In fact, I would like to see more stringent regulations in any natural or wilderness-like environment throughout the state. There is a reasonable expectation of privacy in such settings. The noise, disruption of wildlife, and safety considerations dictates this should be passed and even possibly strengthened. Thank you for your efforts.

Tom Kelly

Salem, OR

Date comment received:

Tuesday, March 1, 2022



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Proposed rule change:

Take-off and landing of drones

Commenter name (if provided):

Robert Taylor

Commenter email (if provided):

fullbookcases@yahoo.com

Public comment:

I think the proposed rule is a good one. I know that when I post a photo on my FB page or a group page - it generates a lot of interest by non-drone people to go to that area. Drone photography is much like other photography but from a different perspective. It will generate interest in the parks.

I am physically limited in my mobility. This gives me a way to see many aspects of nature that are often only seen by a few. This is a blessing for physically handicapped people. Too many feel parks are only for the able bodied that can hike 20 miles to some remote spot.

Regarding noise, I have found that most people do not even recognize my drone was in the air until I am landing.

Finally it should be noted that although drones are very popular and will increase attendance to the parks. I have never flown my drone in a park or beach where there was another drone. The skys of the park will not be "filled with drones".

Date comment received:

Tuesday, March 1, 2022



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Oregon Parks and Recreation Department

Proposed rule change:

Take-off and landing of drones

Commenter name (if provided):

Jim Preston

Commenter email (if provided):

jetjock737@verizon.net

Public comment:

I appreciate you allowing us to comment on this proposed rule. As a retired airline pilot, I enjoy flying my drone as much as possible. (It's less risky, but doesn't pay nearly enough!) I am completely in support of certain restrictions with regard to sensitive wildlife areas, crowded campgrounds and parking lots. But there are so many more open areas where no one will be bothered by drones. And Oregon parks are all absolutely beautiful places to see; and in many cases, those areas may ONLY be visible by a drone.

The FAA is very specific in how drones should be operated, and I would never advocate against those regulations. But I'm also strongly in favor of reducing regulation in open areas where very few people are, and where the scenery is incredible. Therefore, I hope you'll adopt this proposed rule and allow drone aviation to proceed within Oregon's state parks.

Thank you very much for working to permit certain drone operations, and thank you as well for allowing me to comment. I hope that Oregon's foresight and proactive approach will be copied nationwide. You're pioneers!

Date comment received:

Tuesday, March 1, 2022



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Oregon Parks and Recreation Department

Proposed rule change:

Take-off and landing of drones

Commenter name (if provided):

Aimee ROSEBORROUGH

Commenter email (if provided):

aimeeclimbs@gmail.com

Public comment:

Drones should be prohibited at smith rock. They are loud and disturb the natural area.

Date comment received:

Tuesday, March 1, 2022



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Proposed rule change:

Take-off and landing of drones

Commenter name (if provided):

David McRae

Commenter email (if provided):

Public comment:

Regarding establishing a takeoff and landing zone for drones at Smith Rock State Park; It seems impossible to allow drones to fly within the state park without disturbing wildlife and compromising the natural experience for all other users.

I would propose drones only be allowed in search and rescue operations where locating an injured person is critical to their safety. Otherwise, Please do not compromise the natural environment for the enjoyment of a few. Thank you for your consideration.

Date comment received:

Tuesday, March 1, 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):

Stephanie Zloof

Commenter email (if provided):

shaiakenziethomas@gmail.com

Public comment:

Thank you much for the opportunity to comment on the proposed rule. I thank you for proposing a balanced rule that I myself as a pilot can support! I have been a drone pilot for about a year now and love all the opportunities and beautiful sites to explore. Oregon State parks in my opinion are some of the most beautiful places in America and the consideration for us is very much appreciated.

Date comment received:

Wednesday, March 2, 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):

Chris Phillips

Commenter email (if provided):

chrisedge@yahoo.com

Public comment:

There is not a more beautiful place to fly than our state parks and coastlines. Do not make the process more laborious for overstressed NP employees.

Free the drones.

Date comment received:

Wednesday, March 2, 2022



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Oregon Parks and Recreation Department

Proposed rule change:

Take-off and landing of drones

Commenter name (if provided):

Eli Conlee

Commenter email (if provided):

eli@climbersforchrist.org

Public comment:

Dear OPRD -

Thank you for your timely work in assessing the use and impact of unmanned aircrafts systems ("drones") in state parks & recreation areas. While I certainly enjoy the lower impact results of professional footage for permitted films and awesome capacity for drones in research use, I am opposed to non-permitted drone use in the state parks.

Amateur drone usage is, at best, an inconvenience to other user groups and poses disturbance to users and wildlife alike. At worst (and unfortunately, seemingly common in some state parks) it is dangerous for other user groups and a threat to wildlife. I primarily frequent Smith Rock State park (dozens of days per year) as an outdoor professional and recreational climber, hiker, and biker. Drone users have consistently ignored raptor closures, "buzzed" climbers, and added noise interference to all users. Drone pilots are certainly not homogenous in behavior, but I have seen many of them disregard rehabilitation zones or set up off-trail in sensitive areas as they are more focused on their activity than the safety or sensitivity of the area.

At Smith Rock and elsewhere, drone usage also seems to violate not only the natural outdoor experience, but personal privacy as well. For amateur and un-permitted users, there is no consideration of others' personal privacy and other users are often filmed without knowledge or consent. Whereas in permitted use, there is at least an expectation of professionalism in how the footage may be used, or a clearer path of public record for users to communicate with the permitted users if they wish to not have their image used.

I am in favor of permitted drone use in many state recreation areas and parks, and see the shared user group value in allowing amateur usage in certain areas as long as clear parameters are set for drone pilots and other user groups are aware that drone usage and possible filming is occurring.

But I sincerely ask that the OPRD committee *restrict drone usage to permitted professionals* (ideally only those who maintain their FAA Remote Pilot certification) at Smith Rock and any other parks & recreation areas where rock climbers and nesting raptors are active.

Appreciatively,

Eli C.

Date comment received:

Wednesday, March 2, 2022



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Oregon Parks and Recreation Department

Proposed rule change:

Take-off and landing of drones

Commenter name (if provided):

Mark Hoops

Commenter email (if provided):

seahusker@outlook.com

Public comment:

Hi,

I would like to see drones banned from state park or at least outline a restricted spot for them as well as some restrictions along the coast to preserve natural sounds.

Mark Hoops

Date comment received:

Wednesday, March 2, 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):

Jane Sommers

Commenter email (if provided):

fulgurantefarm@protonmail.com

Public comment:

I support no-drone zones in all state parks. I have encountered drones at several State Parks, degrading my experiences there.

Besides being an annoyance, it is also an invasion of privacy, since drones are likely making video of park visitors, without consent. One has no control over how that video will be used.

I would support a complete ban of drones in all parts of every state park, unless a permit is issued for purposes that benefit the public, such as to promote the park or to survey for hazards. When a permit is issued it should be required that the recipient of the permit post notices at the park entrance(s) indicating when and where the drone will be flown.

Jane Sommers

Salem

Date comment received:

Wednesday, March 2, 2022



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Oregon Parks and Recreation Department

Proposed rule change:

Take-off and landing of drones

Commenter name (if provided):

Kim Davis

Commenter email (if provided):

k.mdavis@yahoo.com

Public comment:

I am opposed to the take off and landing of drones in state parks. The recurrent theme in the proposed rules that drones "may not harass, disturb, pursue, or injure...." is insufficient assurance of protection for our wildlife. The proposed rules do not address the disturbance already experienced by wildlife and humans from the use of drones. Drones are not silent. They emit highly irritating noise frequencies for hours at a time. They interfere with other activities enjoyed by park users, including hiking, birdwatching or simply relaxing. They are invasive to other people's privacy and eliminate all hope of experiencing solitude.

To allow the few who want to play with machines, motors and tech toys to disturb the peace of so many who relish time spent outdoors is a disservice to those thousands who wish to continue enjoying Oregon parks.

Please start over. These rules do not adequately address the interests of Oregon's citizen majority and do nothing to protect our commons.

Thanks.

Kim Davis

97306

Date comment received:

Wednesday, March 2, 2022



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Oregon Parks and Recreation Department

Proposed rule change:

Take-off and landing of drones

Commenter name (if provided):

Kathleen and Michael Krall

Commenter email (if provided):

krallfamily@comcast.net

Public comment:

Dear Sir or Madam,

We live along the edge of Netarts Bay in Tillamook County, OR. We are volunteers who do bird surveys for Portland Audubon and East Cascades Audubon in Tillamook county. We also monitor the Oceanside State beach wayside for dead birds as part of the University of Washington's COASST program.

We support the banning of drones near known bird nesting sites. In our area, this would include the beach near Radar Road, just south of Cape Meares State Park, known as "Short Beach." This popular beach hosts nesting Black Oystercatchers and other bird species. We have observed these birds on their nest the last few years. The joint monitoring project of Portland Audubon and USFW reported in Feb 2020 that "the Oregon Black Oystercatcher breeding population is small but stable with only several hundred individuals. This distinctive bird is considered a bird of conservation concern by the US fish and wildlife service due to its dependence on rocky shoreline habitats, its rarity, and vulnerability to threats including climate change and human disturbance."

<https://audubonportland.org/press/new-population-estimate-for-the-black-oystercatcher/>

We applaud you for developing new rules to control this popular activity. We think the plan for banning drones to protect nesting sites should include the Snowy Plover protected areas at Sitka Sedge and Cape Lookout/Netarts spit, but also known sites for nesting Black Oystercatchers, including Short Beach, Boiler Bay and others.

Thank you,

Kathleen and Michael Krall

Date comment received:

Wednesday, March 2, 2022



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Oregon Parks and Recreation Department

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Take-off and landing of drones

Date comment received:

Thursday, March 3, 2022

Commenter name (if provided):

Dan Christian

Commenter email (if provided):

Public comment:

The current wording leaves much of the implementation to the defined launch areas. This makes public input difficult because there is no guidance about how large or common launch areas may be. It would be helpful if there were either example maps, or a statement of the principles determining launch areas in a particular park.

It would be useful if you also defined areas that are “keep out” or have a minimum height. This allows key areas to be protected, which should allow greater freedom outside those areas. Some of these might be seasonal (e.g. bird nesting areas).

I would like to argue that drone are a valid use of our shared parks. Drones can capture images and do research that cannot be done from the ground. Obviously, this cannot be to the detriment of wildlife or other uses.

I would suggest that there should be a “drone day” once a month where wider access is permitted. People would know that these days might be noisier than the rest of the month, but drone users would have access to areas that are normally off limits. Any “keep out” areas defined for wildlife protection would still be in force.

It would be helpful if the permitting process could be reliably done in just a day or two. Drone users may be looking for a weather window or wildlife transit (e.g. whale spotting). If the permit process can be done quickly, then they can apply for permission once there is a likely weather window. It could be that the permitting process become two steps in some cases: general approval for area and activity, then flight approval for specific dates.

It may be worth repeating some standard FAA rules: drones should never influence wildlife, and should never be flown over other parties.

The FAA is rolling out drone remote ID requirements that should dramatically help with accountability. The negative encounters reported in some of the comments should be quickly eliminated once remote ID takes effect.



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Oregon Parks and Recreation Department

Proposed rule change:

Take-off and landing of drones

Commenter name (if provided):

Jim McKinnell

Commenter email (if provided):

jimtrudy@comcast.net

Public comment:

Dear Oregon Parks and Recreation,

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

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

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

Sincerely,

Jim McKinnell

Salem, OR

Date comment received:

Thursday, March 3, 2022



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Oregon Parks and Recreation Department

Proposed rule change:

Take-off and landing of drones

Commenter name (if provided):

Brett Hunsaker

Commenter email (if provided):

misc@hunsaker.org

Public comment:

Concerning Oregon State Parks and rules for drones:

1. Use a light touch policy. Drones should be allowed unless there is a significant negative impact to the public.
2. Although Oregon can't explicitly stop overflight of nude beaches (only FAA can restrict airspace), and you can limit where they take off and land, a better way would be to post signs politely asking for drone pilots to respect the privacy of those at the nude beach.
3. Balance use of parks by drone pilots and others. Rather than completely banning drones, offer "drone days" at the parks where drones can be used. Maybe Wednesday when parks aren't very busy. That way people who want a peaceful walk in the park can know to avoid those days but a drone pilot that want's to capture the beauty of Silver Falls Park can still fly there.
4. Don't ban drones but help people learn to share. I hate hiking on trails used by horses because of all the droppings left behind, but I recognize that horse riders have a right to be out in nature too.
5. Don't believe that drones will hurt people. There will always be more people injured by dogs in the parks than by drones.

Thanks,

Brett Hunsaker

Date comment received:

Thursday, March 3, 2022



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Proposed rule change:

Take-off and landing of drones

Commenter name (if provided):

Elena Guevara

Commenter email (if provided):

llamalace@hotmail.com

Public comment:

I live in Salem and I am greatly in favor of the proposal to create "no drone zones" in and around Oregon state parks and the coast.

Drones are noisy and unpleasant. When they have cameras attached, they can invade citizens personal privacy. I support any legislation that reasonably limits where and when drones can be operated.

Thank you.

Elena Guevara

Date comment received:

Thursday, March 3, 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):

Bruce Alber

Commenter email (if provided):

bpalber@gmail.com

Public comment:

I am writing to address a serious error in the wording for the proposed rules regarding The Take-off and Landing of Drones in State Parks. The idea is probably to maintain the peace and quiet fo the Parks by prohibiting loud, buzzy motorized drones. These usually have 4 or more small rotor blades, turning at a high RPM creating a loud buzzing sound. They are flown remotely, sometimes even beyond the sight of the operator or pilot.

Please simply insert the word motorized into the new rule language. As written, without the word motorized you will ban the flying of kites, balloons on a tether, model gliders, Frisbees, and other forms of silent flying objects.

Please amend the Rule by inserting the word MOTORIZED to solve this obvious problem!

Sincerely,

Bruce Alber

Portland, OR

Date comment received: Thursday, March 3, 2022



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Oregon Parks and Recreation Department

Proposed rule change:

Take-off and landing of drones

Commenter name (if provided):

Bill Bradford

Commenter email (if provided):

billbradford1@gmail.com

Public comment:

Please ban drones!

Date comment received:

Thursday, March 3, 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):

Emily Schnipper

Commenter email (if provided):

emily.schnipper@gmail.com

Public comment:

Hello! Thank you for this opportunity for comment.

I'm writing to encourage that state parks and beaches be closed to drone take-offs and landings. The effect of increasing drone use on nesting birds, seals, and other wildlife is too great. If drones must be allowed, I would encourage the State Parks to create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts.

Thank you,

Emily Schnipper

Date comment received:

Thursday, March 3, 2022



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Proposed rule change:

Take-off and landing of drones

Commenter name (if provided):

WG Pearcy

Commenter email (if provided):

pearcyw@oregonstate.edu

Public comment:

I go to state parks for quietness and relaxation. Drones flying overhead destroy this experience .
Please ELIMINATE OR REGULATE DRONES.

WG Pearcy

Philomath

Date comment received:

Thursday, March 3, 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):

Karen Berry

Commenter email (if provided):

karenrberry1@gmail.com

Public comment:

Dear Protectors of our State Parks,

In order to protect the wildlife that lives in and/or moves through our State, I urge you to pass a rule stating that all state parks and beaches be closed to drone take-offs and landings except where they can be safely allowed. And that the decision of what "can be safely allowed" be based on scientific findings not political opinion.

Thank you for your consideration,

Karen Berry, Oregon resident

Date comment received:

Thursday, March 3, 2022



Submit a public comment on a rule

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Proposed rule change:

Take-off and landing of drones

Commenter name (if provided):

John Morris

Commenter email (if provided):

jomomorris51@gmail.com

Public comment:

I write to urge you to find ways to reduce or eliminate intrusions on my experience of Oregon State Parks and, even more importantly, protect wildlife, by addressing the growing use of airborne drones and electric bicycles. I feel these have no place on otherwise unspoiled public lands. As more people intrude more places more often the habitat and recreation value of Oregon State Parks is diminished.

It may not be a popular move to deny people the use of their new technological toys, but I believe it is necessary to preserve our public park lands.

Thank you,

John Morris

Nehalem, OR

Date comment received:

Thursday, March 3, 2022



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Oregon Parks and Recreation Department

Proposed rule change:

Take-off and landing of drones

Commenter name (if provided):

Fadra Day

Commenter email (if provided):

fadrday@yahoo.com

Public comment:

I am emailing to say that I oppose drone use in state parks as it degrades the quality of the natural experience state parks provide. If drone use is allowed it should be strictly monitored and rules enforced for the safety of people using the park and, more importantly, for the safety of wildlife. Drones can disturb wildlife nesting and wildlife's use of habitat when not flown in ways that do not disturb wildlife. Drones also can intrude on peoples' privacy. So, while I am opposed to drone use in state parks, I ask that, in the event drones are allowed, rules are in place and strictly enforced to protect the peace and safety of the public and wildlife.

Date comment received:

Thursday, March 3, 2022



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Oregon Parks and Recreation Department

Proposed rule change:

Take-off and landing of drones

Commenter name (if provided):

Emilie Brooks

Commenter email (if provided):

thistleamy5@gmail.com

Public comment:

Greetings

Thank you for giving me the opportunity to provide some thoughts on drone usage in state parks.

I am an amateur photographer and nature lover - so taking photographs of our natural areas within our Oregon state park system is a wonderful blessing. To that end I am an annual contributor to the Oregon State Park fund.

However drones and natural areas just do not mix and there is no reason that drones should be allowed to interrupt the birds and animals that make our state parks so special.

Drone use is a purely recreational activity and if there is any chance that they may impact wildlife - I think it is imperative we protect the few acres of Oregon State park land (relative to the size of Oregon) for wildlife.

I say all this knowing my own son who has a drone - opposes these restrictions - but I know he has many other places he can fly his drone and capture great images.

Please protect Oregon's State Parks and the birds and other animals who call our great state home.

Sincerely

Emilie Brooks

Forest Grove, Oregon

Date comment received:

Thursday, March 3, 2022



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Commenter name (if provided):

Robert Bernstein

Commenter email (if provided):

bobbo1946@yahoo.com

Public comment:

I am very much against their usage. They are a disturbance to Birds, some endangered, other wildlife and to me..Wife and I would like to see them banned in such areas...Exception could be made for emergencies like firefighting..

Respectfully,

Robert B. Bernstein

Laura Webb

Portland

Date comment received:

Thursday, March 3, 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):

Sandra Joos

Commenter email (if provided):

joosgalefamily@comcast.net

Public comment:

Thank you for providing this opportunity to express my strong opposition to allowing drones in state parks or on beaches unless safe, designated drone take-off and landing areas can be identified. The determination of any such safe areas in which to allow drones must be based on the best available science. To do this, State Parks should create an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts. While designated areas are being determined, status quo drone use would continue.

In addition, State Parks should include a final map(s) of designated drone take-off and landing locations on their website. In areas that are approved for drone use, the rules should include: 1) No drone take-offs or landing to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas; and, 2) Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.

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

Thank you for your efforts to protect the enjoyment of state parks for all.

Sandra Joos

Portland, OR

Date comment received:

Thursday, March 3, 2022



Submit a public comment on a rule

Oregon Parks and Recreation Department

Proposed rule change:

Take-off and landing of drones

Commenter name (if provided):

Jill Riebesehl

Commenter email (if provided):

riebes@gmail.com

Public comment:

commercial or defense personnel use drones in or near our state parks. They are an invasion of peace and quiet and the privacy we pay for with our feet and tax money.

Jill Riebesehl

Date comment received:

Thursday, March 3, 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):

Gloria Gardiner

Commenter email (if provided):

gloria_gardiner@yahoo.com

Public comment:

- I have visited and camped at state parks on the Oregon coast and have enjoyed the peace, quiet, beauty, and wildlife of this area.
- Parts of the coast are already protected for shorebirds during nesting season, but this protection does not protect adult birds and their chicks from noise that disturbs them and can negatively impact their reproduction and survival.
- One source of such noise is drones, which have in recent years become a nuisance for both human visitors to state parks and the wildlife that inhabit them.
- This negative impact must be regulated by state law. The public interest in preserving endangered wildlife greatly outweighs the pleasure that a small group of humans derives from flying drones over state parks on the Oregon Coast (and elsewhere in Oregon).
- Please adopt and implement a regulatory process that:
- Is managed by an independent technical working group;
- Determines, based on the best available science, where drone use would not negatively affect wildlife and where it would;
- Prepares a final map of the working group's decisions; and
- Prepares for adoption OPRD regulations that contain strong enforcement mechanisms.

Thank you for thoughtfully considering my comments and suggestions.

Sincerely,

Gloria Gardiner

Portland, OR 97213

Date comment received:

Thursday, March 3, 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):

Linda Zook

Commenter email (if provided):

lindazooker@gmail.com

Public comment:

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

Thank you for taking action to help protect wildlife at State Parks and on our public beaches!

Linda Zook

Lake Oswego, OR

Date comment received:

Thursday, March 3, 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):

Nikko Baraquio

Commenter email (if provided):

nikkob@windermere.com

Public comment:

Thank you for providing this opportunity for the public to comment on DRONES

I recommend all state parks and beaches be closed to drone take-off and landings except where they can be safely allowed

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

Thank you for protecting our wildlife. It is important!

Nikko Baraquio

Portland, OR

Date comment received:

Thursday, March 3, 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):

Jennifer Perry

Commenter email (if provided):

jenperry7@yahoo.com

Public comment:

this should be regulated! we are losing our wildlife in all other ways, let's protect them from this!

jennifer perry

Date comment received:

Thursday, March 3, 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):

Laura Ehret

Commenter email (if provided):

llehret@gmail.com

Public comment:

Oregon State Parks people accepting public comments on drone use:

I live on the central Oregon coast where amongst other marine life, Oyster Catchers are threatened.

On visits I have seen drones operated close to nesting Oyster Catchers by ignorant and/or uncaring people.

I am very glad to see Oregon state parks realizing the damage that drones can cause not only to shore birds but to Oregon's reputation as a wildlife destination state.

In addition, support, public and financial (public and private), for the re-introduction of sea otters will not benefit by the state parks not taking EFFECTIVE action, i.e. more than signage, on threats to marine wildlife of any kind.

Adding more park rangers, fines, and organizing a volunteer presence (with clout), would be a start.

L.L.Ehret

Newport, OR

Date comment received:

Thursday, March 3, 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):

Lyn Larson

Commenter email (if provided):

llarson@peak.org

Public comment:

To whom it may concern,

Here's another prime example of unintended consequences of our technology. I've read about drones disturbing nesting plovers on beaches. OK, that's enough right there. This sort of thing needs to be stopped right now. Please come up with legislation with the teeth to strongly enforce it that limits where people can play with their drones. We humans no longer have precedence on this planet, in my opinion. Natural systems and the animals do.

Sincerely,

Lyn Larson

Corvallis

Date comment received:

Thursday, March 3, 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):

DeEtte David-Miller

Commenter email (if provided):

deettemiller@gmail.com

Public comment:

My preference is:

No drones allowed in the air space above or within one mile of Oregon State Parks.

Thank you,

DeEtte David-Miller

Florence, OR

Date comment received:

Thursday, March 3, 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):

Gloria Fisher

Commenter email (if provided):

chaskafisher@gmail.com

Public comment:

Please ban drones from all state parks, forests and natural areas to protect wildlife and provide privacy for visitors.

Date comment received:

Thursday, March 3, 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):

Patricia Noonan

Commenter email (if provided):

patnoon@gmail.com

Public comment:

Dear State Parks,

I have lived at the Oregon Coast for over 40 years and see the confusion that drones are causing nesting birds, many of which are becoming endangered. The drones often fly around and close to the nesting rocks offshore, causing nesting parents to fly in fear

The drones are also noisy, distracting and intrusive for those of us resting or reading on the beach. Operators often think it is "fun" to buzz people, families and their dogs. The drones seem to make a low, continuous noise.

It appears that many of the drone operators are just learning how to use drones. Do they ever crash into people?

I am hopeful that you will find a solution to the drone issues that will protect the wildlife, people and their pets.

Thank you for your consideration.

Patricia Noonan

Date comment received:

Thursday, March 3, 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):

Patty Hodgins

Commenter email (if provided):

phodg1@gmail.com

Public comment:

In response to the invitation to comment on drone restrictions: I haven't witnessed any drone activity, but recently there was a motorized hang glider flying above the Yachats estuary. It was very loud, stayed up for 15+ minutes, and made two separate flights. It was obnoxious in the extreme. It probably isn't possible to add these things to the current discussion, but I wanted to put in a word anyway.

Thanks for reading —

Patty Hodgins

Yachats

Date comment received:

Thursday, March 3, 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):

Susan Bowden

Commenter email (if provided):

rsbowden@comcast.net

Public comment:

Thank you for opportunity to comment.

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

I live in Florence Oregon. Just saw some beautiful Oyster catchers on my walk last week. They are so beautiful, so vulnerable. Please do all you can to protect them. I am consistently bothered by ATV noise on the weekend. I can't imagine how disturbing to wildlife. We need to minimize any ongoing or potential disturbance. The noise pollution is definitely increasing here on the coast. Especially on the weekends.

Thank you,

Susan Bowden

Florence, OR 97439

PS Here's a picture of me picking up trash on the beach!

Date comment received:

Thursday, March 3, 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):

Ted Magnuson

Commenter email (if provided):

twmagnuson@gmail.com

Public comment:

Parks Commission

Dear Custodians of the Public Spaces

Operating Drones in our Parks makes no sense. We go to State Parks to commune with nature, recognizing that this is a place many animals call home. Drones have no more place here than to run a dog off leach. This being a new technology, I can understand that the law has not kept up with changing practices. However on the face of it, it should be clearly within the bounds of the spirit of previous practice such as don't drive cars on hiking trails, etc.

Thank you for all you do to make our state parks the preserves they are.

Ted Magnuson

Date comment received:

Thursday, March 3, 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):

Cindy Tofflemoyer

Commenter email (if provided):

75catlover06@gmail.com

Public comment:

Please take Oregon naturalists reviews and studies into consideration. Tom McCaul spearheaded Oregonian's right for beach access; I certainly don't believe that he would have crafted the bill with the right to negatively impact our beach dependent species. I'm a 63+resident of Oregon and enjoy the coast and it's beaches and shore critters. Not putting restrictive measures on drones or other invasions into sensitive critters nesting and living areas sure seems to be self serving or constituent based thinking. What's the problem? The 4- wheeling communitu has remained robust even though they have some State restrictions.

The arrival of new technology requires the State of Oregon to consider all possible adverse impacts. Thank you for your time.

Date comment received:

Thursday, March 3, 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):

Tim Nutley

Commenter email (if provided):

monsieurchurchy@icloud.com

Public comment:

impact/disturbances upon wildlife are already documented by drone use in state parks; rather than fixing the damage later an ounce of prevention now is in order by limiting (or in my preference eliminating annoying drones altogether) in state parks.

Tim Nutley

Portland OR

Date comment received:

Thursday, March 3, 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):

Elizabeth Sias

Commenter email (if provided):

egsias@gmail.com

Public comment:

I am completely opposed to the launching, operating, and landing of drones in state parks. These are outdoor spaces where people come to hike, climb, and enjoy nature and wildlife. Drones are unnatural, loud, and a nuisance, not to mention obnoxious. As a rock climber, I also think that drones pose a danger to all climbers. More importantly, drones are a threat to nesting falcons -- why have climbing wall closures if you're going to allow flying drones?! That's far worse. Please, for the animals who live in these lands and the humans that visit, ban the flying of all drones and unmanned aircraft in all state parks.

Date comment received:

Thursday, March 3, 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):

Linda Zahl

Commenter email (if provided):

lindazahl2@gmail.com

Public comment:

I am concerned about drone usage at sOregon State Parks and hope that the guidelines suggested by the Auduban Society are accepted. Drones are noisy, disturbing the peace and quiet that I treasure at parks. They also are intrusive in that they carry cameras which are often filming the people which includes children without consent. Please limit drone use within State Parks to not only protect wildlife and nesting birds but to protect the public and our quiet natural spaces.

Date comment received:

Friday, March 4, 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):

Katherine Fuller

Commenter email (if provided):

kath.fuller3@gmail.com

Public comment:

Dear Oregon State Park Planning Team -

Thank you for the opportunity to comment on the new drone regulations. I live and work on the coast and have seen the number of drones increase in recent years and have tried to field questions from visitors regarding where they can fly their drones.

I spend a lot of time on the beach and on nearby trails and have seen drones being flown near black oystercatcher nests frightening the adult birds and leaving the chicks unprotected, over seal pupping areas when seals are actively giving birth (really!) and over historic lighthouses. All places where drones should not be present.

Please limit the use of drones to safe stretches of parkland without sensitive wildlife. And, because wildlife is not static, establish an easy way to limit drones seasonally or on an as-needed basis as wildlife moves from area to area.

Regional maps of areas where drones use is prohibited or restricted would be helpful, as would a detailed web-based map.

Finally, all park regulations - including drone use - must be enforced.

Thank you,

Katherine Fuller

Newport

Date comment received:

Friday, March 4, 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 Skadsen

Commenter email (if provided):

organicjewelry@gmail.com

Public comment:

I strongly urge you to not allow drone use in State Parks, just like in wilderness areas. It disturbs wildlife and they are extremely disruptive to human users as well. I've had to endure drone feet away from overlooks as people film themselves, seen crashed drones on the sides of cliffs, and had my nature experiences ruined by the obnoxious buzz of drones selfishly filming while ruining everyone else's right to peace and quiet, not to mention privacy concerns. I've been filmed without my consent and there is not way to opt out. I don't visit state parks to have to hear and watch annoying aircraft ruin my day, scare wildlife away, and disrupt mating and nesting birds. If you're going to allow it at all, I urge the strictest of terms, perhaps limited to one day a month, permits required, and severe fines for violators, and most parks closed off from them entirely.

Erica Skadsen

Date comment received:

Friday, March 4, 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):

Susan Saphone

Commenter email (if provided):

susansaphone2@yahoo.com

Public comment:

I am writing to ask that drone use is regulated at the Oregon coast and in Oregon State Parks.

Just as motor vehicles are limited in our natural settings, drones are intrusive for wildlife and for people enjoying the solace of nature.

There should be no drones taking off or landing within 100 meters of observed birds/known nesting sites or near seal haul out and pupping locations. Take-offs and landings should be discontinued near any area that is repeatedly disrupted.

The endangered Western Snowy Plover and species of concern such as the Tufted Puffin and the Black Oystercatcher should be especially protected from drone flights.

Mapping areas that may be used for taking off and landing and having a strong enforcement mechanism will help regulate drone use.

Thank you for accepting comments,

Susan Haywood

Portland, OR

Date comment received:

Friday, March 4, 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):

Jeff Selck

Commenter email (if provided):

westcoastsales78@gmail.com

Public comment:

Why are drones getting targeted as a disruption? Pollution from boats and humans do far more damage then that little drone ever will. I really feel people who intentionally use a drone to do disruptive things should be fined rather then screw it up for everyone.

I see people freak out about a drone in the air on facebook... "someone was watching me" but the honest truth is that someone is simply flying a drone.. I do it all the time.. get sunset pictures , fly over the ocean at levels allowed to see sea life and wildlife all together.

Some of these places have beauty that people won't get to enjoy all because drones are banned. Drones are not the enemy.. just the people who abuse them.

Date comment received:

Friday, March 4, 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):

Suzanne Vautier

Commenter email (if provided):

gourdnbead@yahoo.com

Public comment:

I am really concerned about the mouth of the Smith River. I have been going there for years to watch the marine mammals and birds from the parking area. And I have noticed over the years an increase in people boating and kayaking to the sand bar where they then chase off the animals by trying to get a closer look. There are times it is so bad I just want to cry.

The thought that drones could be added to the harassment of wildlife at the mouth of the Smith River worries me.

Suzanne Vautier

Selma, OR

Date comment received:

Friday, March 4, 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):

Nancy Brown

Commenter email (if provided):

brownnab@gmail.com

Public comment:

Thank you for the opportunity to comment on this important issue. Our parks and wildlife are under enough stress with loss of habitat and over crowding. There is nothing worse than seeing and hearing a drone while out in nature, never mind the disruption to wildlife. I agree with the following recommendations:

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

Thank you.

Nancy Brown

Forest Grove, OR

Date comment received:

Friday, March 4, 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):

Dorothy van Winkle

Commenter email (if provided):

dorothyvanwinkle@yahoo.com

Public comment:

Most people who go into the great outdoors are there to find peace in the quiet and beauty surrounding them. That is ruined by the steady, intrusive noise of drones. At Iron Mountain a couple of years ago, all hikers were stunned then angered by the intrusion of one drone. Imagine if it were 10 drones? Drones should be banned from all popular outdoor activity areas. They are banned from the Wilderness areas, but most of Oregon is not a designated wilderness area. Please let us keep one place to go that is free of technology and noise. Thank you.

Date comment received:

Friday, March 4, 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):

Kelsey Parada

Commenter email (if provided):

kelsey.parada@gmail.com

Public comment:

To whom it may concern,

I recommend all state parks and beaches be **closed** to drone take-off and landings except where they can be safely allowed.

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

Thank you for your time and consideration.

Date comment received:

Friday, March 4, 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):

Kate Ferrandino

Commenter email (if provided):

nowallremains@gmail.com

Public comment:

Dear Oregon State Parks Staff,

Thank you for the opportunity to comment on the use of drones in state parks and on beaches.

Please close state parks and beaches to all drone use except where the most up to date and accurate science shows drones can safely land and take off.

It would help if you created a group including agency, academic, NGO, and tribal experts to determine where drones would have the least cultural impact and impact on wildlife.

Please make sure finalized maps of where drones are allowed and not allowed are posted on each park or beach website as well as posting these suggested rules:

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

All areas should be periodically reviewed for the impact drones are having on wildlife and these rules should be strongly enforced.

These steps are vital to protect vulnerable sea birds. The wildlife found in our state beaches and parks help enliven these beautiful areas and let us come close to and connect with nature.

It is our imperative responsibility to do all we can to protect wildlife as we enjoy Oregon's beautiful outdoor areas.

Thank you again for your kind attention.

Best,

Kate Ferrandino

97209

Sent from my heart

(she/her)

Date comment received:

Friday, March 4, 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):

Kyenne Williams

Commenter email (if provided):

kyennew@yahoo.com

Public comment:

Hello, and thank you for providing an opportunity for the general public (e.g. voters) to comment. I hesitate to recommend legislation unless it will be enforced (the last thing anyone needs is more good intentions enacted without the means or will to follow through). Specifically -

- Having grown up on the Oregon coast, I know firsthand how vulnerable many bird and wildlife populations are to hazing and unnecessary 'publicity'. So I strongly encourage that all state parks and beaches be closed to drone take-off and landings except where they can be safely allowed
- State Parks should determine where to allow drones based on the best available **science** (rather than guesses, popularity contests, etc). Maybe asking why we 'need' or want drones in public spaces
- Please consider the creation of an independent technical working group (including agency, academic, NGO, and tribal experts) to determine appropriately designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts
- While designated areas are being determined, status quo drone use would continue (i.e. this would not ban all drone use at any time during the process)
- State Parks should include a final map(s) of designated drone take-off and landing locations on their website
- In areas that are approved for drone use, the following should be included:
 - No drone take-offs or landings to occur within 100m of any observed birds and/or known nesting locations or from seal haul out and pupping areas.
 - Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.
 - All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time.
 - Again, there must be funding and personnel to ensure strong enforcement mechanisms in final rules

Thank you for your consideration,

Kyenne Williams

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

Gibran

Date comment received:

Friday, March 4, 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):

Nora Polk

Commenter email (if provided):

nora.mattek@gmail.com

Public comment:

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

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

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

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

Sincerely,

Nora Polk

Date comment received:

Friday, March 4, 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):

Kira Talo

Commenter email (if provided):

krayor@gmail.com

Public comment:

To whom it may concern,

Thank you for for providing this opportunity. I have had a number of encounters with drones in parks and on beaches that were unpleasant. Our state parks and beaches should be a place for relaxing in nature, where we can “unplug,” not another place where we have to constantly navigate technology. They should also be places for protecting wildlife from stressors such as drones. Here are some recommendations:

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

Thank you,

Kira Talo RN

Date comment received:

Friday, March 4, 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):

Susie Stevens

Commenter email (if provided):

susieps2@yahoo.com

Public comment:

First, thanks so much for giving us this opportunity to give you input on drones.

Hopefully you'll close all the parks & beaches to drone take-offs & landings except where safe & use best available science to determine where to allow.

We should have an independent tech. working group to say where those could be allowed that protect wildlife (meanwhile allowing status quo use)

Please include final maps of locations on your good website. In areas that are approved for drone use, include in the rules not allowing within 100 meters of any observed birds/nesting, seals and they'd be discontinued if repeated disturbances occur in same areas.

Please review areas periodically based on best science and have strong enforcement in place for final rules.

Thanks for your help in this important issue,

Susie Stevens

Florence

Date comment received:

Friday, March 4, 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 Barrett

Commenter email (if provided):

ryanbarrett1@gmail.com

Public comment:

Hello,

Thank you for allowing public comments on this subject.

There is nothing more disruptive to wildlife and personal enjoyment than a drone buzzing overhead. Keep nature natural—ban drone use.

Ryan

Date comment received:

Friday, March 4, 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):

Daphne James

Commenter email (if provided):

daphleej@yahoo.com

Public comment:

As a frequent visitor to Oregon parks and wildlife areas, I support the proposed No Drone Zones.

Daphne James

Eugene, Or.

Date comment received:

Friday, March 4, 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):

Georgette Silber

Commenter email (if provided):

georgettesilb@aol.com

Public comment:

I think that there should be "**yes** drone areas" not "**no** drone areas." Drones should only be allowed in areas where they can do no harm to the environment and to animals, plants and humans. The only exception should be when they are being used in an emergency situation by trained (perhaps licensed) responsible people.

Georgette Silber

Date comment received:

Friday, March 4, 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 McCaffrey

Commenter email (if provided):

oldcolleen@gmail.com

Public comment:

As a long-time hiker and avid camper in Oregon I have to agree that No Drone areas are a necessity. Nothing worse than hiking to a beautiful, peaceful spot along a meandering river and encountering a hovering quad drone above you with its annoying whine, driving away any hope of seeing wildlife. As a birder I am horrified by drones on the beaches. Don't the birds have enough humanity to contend with without a drone in the mix?

Date comment received:

Friday, March 4, 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):

Thomas Boyd

Commenter email (if provided):

tomtotalhip@gmail.com

Public comment:

I support the proposed rules limiting drone flying. I prefer enjoying public areas without the buzz of drones overhead. I am aware that the unauthorized flight of drones in wildfire zones represented a potential danger to airborne firefighters. Also important is protecting environmentally sensitive areas. Thanks for soliciting this input.

Thomas M. Boyd

Eugene, OR

Date comment received:

Friday, March 4, 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):

Sally Krueger

Commenter email (if provided):

sallypkrueger@comcast.net

Public comment:

I absolutely hate drones and hope you ban all of them.

Sally Krueger

Eugene

Date comment received:

Friday, March 4, 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):

Dorothy van Winkle

Commenter email (if provided):

dorothyvanwinkle@yahoo.com

Public comment:

Most people who go into the great outdoors are there to find peace in the quiet and beauty surrounding them. That is ruined by the steady, intrusive noise of drones. At Iron Mountain a couple of years ago, all hikers were stunned then angered by the intrusion of one drone. Imagine if it were 10 drones? Drones should be banned from all popular outdoor activity areas. They are banned from the Wilderness areas, but most of Oregon is not a designated wilderness area. Please let us keep one place to go that is free of technology and noise. Thank you.

Date comment received:

Friday, March 4, 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):

Monica Ozwoeld

Commenter email (if provided):

monioz@comcast.net

Public comment:

As a person who spends a lot of time hiking, backpacking and snowshoeing I fully support putting restrictions in place. I know how it feels when I see and hear the drones above me when I am out in nature. It destroys the peace and solitude of the areas for me, not to mention how I must be for the various wildlife inhabiting those areas. Thanks for setting up these restrictions.

Monica

Date comment received:

Friday, March 4, 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):

Lisa Bosca

Commenter email (if provided):

bosca38@q.com

Public comment:

I am a fifth generation Oregonian. Over the years I have grown more aware and cultivated a deeper understanding of our roll on this planet. It's not to be taken for granted, or dominated by our needs for entertainment. It needs each of us as stewards, for all inhabitants without a voice. I greatly enjoy and appreciate our beautiful and unique Oregon State Parks and truly hope drone activity will be strictly regulated with all attention toward protecting, caring and not disturbing all naturally winged species.

My voice is their unobtainable opportunity to speak.

Please do what is right and what legacy you choose to be a party to.

Lisa Bosca

Date comment received:

Friday, March 4, 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):

Judith Lepuschitz

Commenter email (if provided):

oceanmoon1@yahoo.com

Public comment:

Hello,

Our relationship with nature is already highly questionable. I am a highly educated, open minded citizen. Yet, it is beyond me why anyone needs to “entertain” themselves by commanding a noisy, intrusive, and potentially dangerous robotic apparatus. The dangers to wildlife and humans alike are well documented.

If it is impossible to outlaw the use of drones, then strict limits on their use must be created:

1. Drones should not be allowed ANYWHERE along the coast - not near campgrounds or beaches or cliffs or state parks, state and national recreation areas and the like.
2. There should be a protected zone along the entire Oregon coastline, from north to south, and many miles wide, all the way to the east, to the coastal mountain range.
3. Drones should not be allowed in the airspace above any city or town or village.
4. If drones can't be outlawed, then any law regulating them should be constructed in a way that their operation will only be legal in very limited areas, like designated “drone playgrounds” far away from people, wildlife, etc.

Judith K. Lepuschitz, Ph.D.

Vice Consul (Ret.)

U.S. Department of State

Date comment received:

Friday, March 4, 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):

Tammy Spencer

Commenter email (if provided):

tammy_spencer@icloud.com

Public comment:

Greetings,

I understand Oregon State Parks is accepting public comments to help inform where drone take-off and landings will be allowed within State Parks and along the ocean shore. Thank you for providing this opportunity. This is a such great time to help better protect nesting birds, marine mammals, and other wildlife from drone disturbances.

Want to share my own experience. While visiting Jackson Bottom Wetlands last year I went up to a viewing area where I frequently see both Blue Heron and Bald Eagles. I was appalled to find an individual flying a drone on a park in a bird viewing area where clearly it would land from and previously taken off there. There were no birds visible which makes sense with an active drone disturbing their environment.

Here are my thoughts.

- State Parks and beaches should be closed to drone take-off and landings except where they can be safely allowed
- State Parks should determine where to allow drones based on the best available science
- State Parks should create an independent technical working group to determine appropriate designated drone take-off and landing areas that minimize wildlife, cultural and recreational impacts
- State Parks should include a final map(s) of designated drone take-off and landing locations on their website
- No drone take-offs or landing to occur within 100 miles of any observed birds and/or known nesting locations or from seal haul out and pupping areas
- Drone take-off and landings should be discontinued if repeated wildlife disturbance events occur in the same location.
- All areas should be periodically reviewed for inclusion or removal as designated drone take-off and landing areas based on the best available science as wildlife usage and other factors can change over time.
- State Parks should include strong enforcement mechanisms in final rules

Thank you,

Tammy Spencer

Washington County Resident

Portland Audubon Board Member

Date comment received:

Friday, March 4, 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):

B Williams

Commenter email (if provided):

Public comment:

Thank you for allowing the opportunity to comment on the draft rules regarding drone take-off and landing on State Park lands. I understand that when used responsibly, drones can be an enjoyable way for some users to enjoy our natural spaces, and I believe drone operators deserve to have a place to fly safely and without negatively impacting others. However, from my experience it appears that a very small percentage of drone pilots actually know, understand, and follow the rules. To sum up what I have seen, drone use usually benefits a single person while disrupting the overall experience of numerous other park visitors. Drones can and do invade other users' personal space and are noisy in places where solitude, quiet, and privacy are desired.

I live on the Oregon coast, spend time on the beach several days per week, and personally see examples of irresponsible and illegal drone use on a fairly regular basis during the seabird nesting season. My wife and I volunteer as monitors for nests of Black Oystercatcher (a species of concern) and have witnessed firsthand how territorial Oystercatchers are towards drones, chasing any drones that are within hundreds of yards and leaving nests with eggs and/or chicks unguarded against ever-present aerial predators for significant periods of time. The unfortunate reality is that many drone pilots on the coast are irresponsible and ill-informed about Federal regulations regarding the harassment of wildlife.

I would suggest banning drone use on ocean shores from Mar 15 through Sept 1 to avoid conflicts with nesting seabirds, as recommended by the US Fish & Wildlife Service in this article about the effects of drones on nesting seabirds - <https://medium.com/usfwspacificnw/drone-use-putting-pressure-on-nesting-seabirds-on-oregon-coast-b77241ca73ec> To protect the rights of the majority of park visitors who are not there to operate a drone, I believe the default should be for park areas or beaches to be closed to drone take off and landings unless otherwise allowed. This would align more closely with US Fish & Wildlife policy and thus create similar expectations for drone users.

In addition, I believe drone operators should be required to obtain and pay for permits to operate in State Parks and on ocean shores. In addition to allowing monitoring of drone usage in their area of purview, requiring permits would provide revenue to OPRD, an organization which doesn't have the funding to finance "drone police". Enforcement will always be a thorny issue with drones because drone operators engaged in irresponsible/illegal activities can be difficult to locate. However, requiring all drone operators who wish to launch and land within State Parks and other public areas of the coast to register and invest financially would help to curtail irresponsible/illegal drone operations. All drone operators flying for commercial purposes should be subject to a standardized, fee-based special use permitting process. Strong enforcement mechanisms should

be part of the rules.

Drones should not be allowed in any crowded areas including but not limited to, parking lots, campgrounds, popular beaches and rock-climbing spots, etc., to ensure the safety of the public.

As currently written in section "OAR 736-010-0040 Visitor Conduct (9) (f)", and "OAR 736-021-0100 Visitor Conduct (5) (g)", the rules say "Proposed zones will be posted on the department website", language which is much too vague. To make it as convenient as possible for drone operators to know where it is legal to fly, I would strongly recommend to have all State Park prohibited areas available on a single interactive GIS-based map on a highly visible web page somewhere on OPRD's state-level website (for example, under the "Plans, Rules, Permits" section). This map would provide "one stop shopping" where drone users could zoom and pan to their area(s) of interest. All too often when I have talked directly with drone operators who are flying illegally (usually harassing Black Oystercatchers), their response is "I didn't know". Ignorance of the law is never a valid excuse, which means education of the average drone user is going to be extremely critical to the success of OPRD's implementation of the new rules. Along these same lines, Oregon's drone rules need to be somehow integrated with the FAA's regulations, perhaps by offering links to the FAA regulations on the same OPRD website as the map.

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

Interestingly, Washington State allows drones in State Parks by permit only - <https://www.parks.wa.gov/1080/Remote-Controlled-Aircraft>

Date comment received:

Friday, March 4, 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:

I propose that the wording of the rule should be changed as follows (occurs in several places):

WAS: "Takeoff and Landing"

IS: "Takeoff or Landing"

I'm pretty sure the intent is to regulate each of two separate activities: "Takeoffs" or "Landings".

I'm pretty sure the intent is not to regulate the combination of two events: "Takeoff and Landing"

Date comment received:

Friday, March 4, 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):

Steve Northrop

Commenter email (if provided):

stenor@aol.com

Public comment:

If I had my way, drones would not be flying in state parks - they ruin the experience. So I support a no drone zone in all Oregon state parks.

Steve Northrop

Date comment received:

Friday, March 4, 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):

Darko Sojak

Commenter email (if provided):

darchey@comcast.net

Public comment:

Please, "no drone zones" near nesting wildlife and recreational sites.

Thank you,
Darko Sojak
Eugene, OR

Date comment received:

Friday, March 4, 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):

Omni

Commenter email (if provided):

omnimountainskyrainbow@gmail.com

Public comment:

How about instead, designated places where drones can be, since they are a nuisance. Give them special fields or parks. Prohibit them everywhere else.

I already know women who have been peeped at by drones.

Isn't it ironic that even as the bird populations are crashing, artificial birds, with annoying sounds and invasive capabilities are replacing them? How sad.

Omni

Date comment received:

Friday, March 4, 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:

Rule language clarification may be needed in several places. A lawyer or professional rule-maker might be needed to get the wording correct.

WAS: "Takeoff and Landing"

IS: "Takeoff or Landing"

Consider the case where a person takes off outside of the park, but lands inside the park. They have broken the rule for "Takeoff or Landing" but have not broken the rule for "Takeoff and Landing".

I'm sure you do not want to limit the regulations to events where both the takeoff and the landing occur in the park.

Date comment received:

Friday, March 4, 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):

Lorelei Jossart

Commenter email (if provided):

loreleiwildcatphotography@gmail.com

Public comment:

How about just no drones at all? We got along for a lot of years without them.

Date comment received:

Friday, March 4, 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):

Amy Dessert

Commenter email (if provided):

Public comment:

Drones can be effectively used for scientific data collection. I am not opposed to that use of drones. But state parks are some of the few places where I go to enjoy relatively unspoiled nature. I have had the unpleasant experience of hiking near the irritating whine of someone's low-flying drone, and I have seen drones flying around near a cliff where hawks were perched. I am sure some drone operators fly them responsibly, but far too many operators are oblivious to the disturbance to wildlife their drones cause or even excited to try to get an animal to react. I am opposed to allowing take-off and landing of drones in state parks.

Date comment received:

Friday, March 4, 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):

Monte Westerfield

Commenter email (if provided):

monte@uoregon.edu

Public comment:

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

Thank you for your consideration.

Monte Westerfield
Eugene, OR

Date comment received:

Friday, March 4, 2022