



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Ramona Butters

Date comment received:

January 30, 2026 10:53 PM

Location (if provided): {city}, {state}

Public comment:

It has come to my attention that a policy for drones in state parks and shorelands is being considered.

I would prefer to have a "no drone policy" for these areas!

There are plenty of locations where drones are being used and they are very irritating if one is looking for a quiet zone to enjoy the abundant wildlife in this amazing area.

It is not a very big ask to just keep these areas free of these intrusive flying machines that seem to be everywhere at once.

Also most drone usage is done for monetary purposes by "influencers" at the cost of everyone else's' privacy. How is this supporting the majority of state park users?

Please consider this when you are discussing drone usage.

Sincerely

A citizen of Langlois

Ramona Butters.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Teri Spencer

Date comment received:

January 31, 2026 08:09 PM

Commenter email (if provided):

tbowspen@gmail.com

Location (if provided): {city}, {state}

Public comment:

Thank you for the opportunity to submit comments on the proposed rules for drone operation in and around Oregon State Parks. The proliferation of drone use around the intertidal areas of Oregon is causing serious adverse impacts on the wildlife there. I strongly suggest that drones be prohibited year-round, at a minimum in all Oregon Rocky Habitat Management Areas, Marine Reserves, and Marine Protected areas. Drone take-off and landing should be prohibited for at least 0.5 miles from such areas.

My position on this is based on my extensive experience witnessing the adverse impacts drones have on the wildlife inhabiting the coast in the Bandon area. As a resident of Bandon for 12 years I have spent countless hours walking on the local beaches throughout the year. Doing so, I've had a "front row seat" to dozens of incidents where drones are flown over the beaches, and onshore and offshore rocks, where numerous seabirds, shorebirds and marine mammals live. The mere presence of the drone clearly harasses the wildlife, who are disturbed/agitated and react in numerous ways. They all react as if the drone is a "familiar" predator, such as Bald Eagle or Peregrine Falcon. If the drone is at low altitude, the pinnipeds who are hauled out will escape into the ocean, some leaving behind their newborn pups. The seabirds, such as murre and gulls. will take to flight to escape the drone, leaving their active nests vulnerable. The shorebirds, such as the Black Oystercatchers react more aggressively by chasing the drone to fight it off.

For the past seven years I have participated in the Oregon Black Oystercatcher Project of the Bird Alliance of Oregon., monitoring the Black Oystercatchers during their nesting season. Every year I witness multiple drone incidents of flying over the Oystercatchers' active nests, causing the parents to take to flight, leaving their eggs and/or chicks completely unprotected and vulnerable to the ever-present predators (e.g. Western Gulls, Peregrine Falcons) while they frantically chase the drone.

There are three Black Oystercatcher pairs who every year nest on the rocks at the Face Rock Wayside OPRD park. Regular public events are held there during the Black Oystercatcher nesting season that bring hundreds of visitors to the bluff and beach. These events have resulted in numerous drone incidents flying over and disturbing the three active Oystercatcher nests. When that occurs, it is not unusual to see all six Oystercatcher parents leave their eggs/chicks and aggressively chase the drone for up to 15 minutes while the drone operator is found and forced to bring it down.

Knowing that each Oystercatcher nest in the Project is monitored for only 30-60 minutes per week, the significant number of drone disturbances that occur during that fraction of time in the week makes one wonder just how many drone disturbances, and what harm might be occurring to the Oystercatchers throughout the rest of the time.

Thank you for considering my submission. I believe that OPRD and all applicable government agencies in Oregon must focus on the protection of all wildlife within their jurisdictions, and thoughtful rules and restrictions for drone operation are vital to effective protection.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

James Krier

Date comment received:

February 1, 2026 06:33 PM

Commenter email (if provided):

jmkrier@gmail.com

Location (if provided): {city}, {state}

Public comment:

Dear Oregon Parks and Recreation Department,

Thank you for your commitment to public service and your dedication to make parks better each year. I have been making comments to about drone rule making for a decade now starting with emails to the outstanding Chris Havel and others. It seems like Oregon wants to get it right, however the draft rules are overly prohibitive and miss many important considerations.

Please cancel the current flawed rule making process and openly support responsible drone photography in all parks.

Why has taken a decade? The reason is no one can figure out what problem is actually being solved... Drone photography is among the safest recreational activities, it causes less disturbances to wildlife than hiking and its content is protected under the First Amendment of the Constitution. Free speech does not stop at the park border. If ORPD wants to get it right, copy the National Forests and FAA policies. Many legitimate concerns are already covered with existing rules.

Park managers nationwide are openly discriminatory towards drone photographers in a way that is unique among recreational activities. Park managers are not trained in First Amendment protection and do not realize photography is a free speech issue. The safety and disturbance criteria applied to drones is (purposely) impossible to meet. In Colorado, Assistant Director Heather Dugan said it best: "If a [bird] changes direction ... that's harassment ... and it's illegal." If a fish saw a canoe paddle and changed directions, would boating be banned? If a bird saw a dog in a park and left its nest, would dogs be criminalized? If someone crashed would all biking be cancelled? Drones get smaller, quieter and safer every year, there is no evidence restrictive rules are justified when compared evenly to other activities already happening every day in Oregon parks.

The Ansel Adams of this generation will use a drone to tell the story. To cite one example, surfing journalism is nothing without photography and these days almost every surfing video you will see is a drone video. Imaging how dangerous and loud it would be to capture those images with a full scale helicopter. In the current draft of the ORPD rules, the daredevil helicopter pilot has more protections than a person flying a drone that weighs less than a pound. Additionally, you may have seen recent ICE "SOS" protests over a frozen lake in Minnesota or Ocean Beach in San Francisco. These shots of thousands of people speak to the world. Drone photography is not like free speech, it is free speech. The current ORPD rule making completely misses this point and the current rule making be scrapped until constitutional protections are understood by all park managers.

One questions ORPD needs to address if whether a virtual park visitor is worthy of the same respect as a physical park visitor. ORPD impressively manages 360 sites around Oregon, we have been to many of them, but few can go to

each one. The way most people will learn about each individual park is through digital content. In 50 years, when folks look back at this era of outdoor stories, they will desperately seek out drone photography. If some experiences can be shared digitally, it may reduce foot traffic in the most crowded parks. ORPD focuses too much energy on prohibitive and discriminatory rules, not finding unique opportunities or encouraging best practices.

Activist organizations with nebulous financial backing claim any drone outdoors is clearly bad for wildlife, especially birds. The scientific literature has a nuanced take on this issue. A meta-analysis (see Brisson-Curadeau 2024 in *Frontiers in Ecology and the Environment*) of over 100 peer-reviewed articles shows, when properly used, drones can be less intrusive than human presence. There has been no study that has showed loss of wildlife population because of recreational drones, yet it is commonplace for users to be discussed like criminals. The criticism often comes from unfocused frustration of the idea of any motorized device. In the early 2000s, some wanted to ban cell phones from parks. Freedom does not start where irrational fear stops.

ORPD is obsessed with drones for some strange reason. Why not focus on factors impacting habitat loss outside park borders? Or overcrowding in parks? Or domestic dogs, E-bikes, horse riding, camp fires, civil aviation, parasailing or motor boating? None of these are present in pure wilderness and they all have impacts. It is easy to turn unorganized drone photographers into the straw man of the frustrations of modern life. It is hard to push real change that makes a difference.

Thank you for considering these comments.

Regards,
James Krier



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Peter Graube

Date comment received:

February 1, 2026 06:43 PM

Commenter email (if provided):

jjdanes@icloud.com

Location (if provided): {city}, {state}

Public comment:

Please restrict drone usage in state parks. The drones disturb nesting birds, disturb other wildlife and disturb people.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Rachel Frennea

Date comment received:

February 1, 2026 07:05 PM

Commenter email (if provided):

rachelfrennea@gmail.com

Location (if provided): {city}, {state}

Public comment:

- We appreciate, with the adoption of new rules, State Park managers will now have tools to actually regulate drone use in state parks.
- Drones disturb birds and wildlife because they are perceived to be predators and have been shown to cause significant impacts to nesting birds. With this in mind, we urge OPRD to take a precautionary approach to where and when it allows drone use.
- Millions of Oregonians and out-of-state visitors enjoy Oregon's amazing state parks. **Only a small fraction of these users operate drones yet their noise and intrusion affect wildlife and scenic habitats.** The vast majority of visitors come to parks to enjoy beautiful landscapes, wildlife and quiet time away from the hustle and bustle of everyday life. **OPRD should recognize this aspect of visitor use and only allow drone use in a small number of limited areas** that are not visited by people seeking natural qualities of the parks and that are not used by sensitive birds and other wildlife.
- Oregon's newly updated [State Wildlife Action Plan](#) includes over 70 at-risk species of birds and mammals, many of which are known to be negatively impacted by drones. This includes birds like the Black Oystercatcher, Brown

Pelican, Caspian Tern, Peregrine Falcon and mammals including the Harbor Seal and Steller's Sea Lion.

- We appreciate State Parks draft rules specifically prohibit drone use in Snowy Plover management areas. **The rules should prohibit drone use in all Rocky Habitat Management Areas, Marine Reserves and Marine Protected Areas as well.**
- **We recommend OPRD adopt no take off and landing rules in a 0.5mi buffer in OPRD managed land adjacent to all U.S. Fish and Wildlife Service refuge and other federally lands** designated to protect wildlife populations and habitats.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

kelly lanspa

Date comment received:

February 1, 2026 07:18 PM

Commenter email (if provided):

kellylanspa@yahoo.com

Location (if provided): {city}, {state}

Public comment:

Please prevent drones from disturbing birds and other creatures while they rest and play. Not only are the annoying to humans but they are deadly to animals.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Catherine Green

Date comment received:

February 1, 2026 07:27 PM

Commenter email (if provided):

cgweniger@gmail.com

Location (if provided): {city}, {state}

Public comment:

Restrict drone traffic please! Let's protect our valuable coastal animals!



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Nic Westendorf

Date comment received:

February 1, 2026 07:53 PM

Commenter email (if provided):

NicWestendorf@gmail.com

Location (if provided): {city}, {state}

Public comment:

- We appreciate, with the adoption of new rules, State Park managers will now have tools to actually regulate drone use in state parks.
- Drones disturb birds and wildlife because they are perceived to be predators and have been shown to cause significant impacts to nesting birds. With this in mind, we urge OPRD to take a precautionary approach to where and when it allows drone use.
- Millions of Oregonians and out-of-state visitors enjoy Oregon's amazing state parks. **Only a small fraction of these users operate drones yet their noise and intrusion affect wildlife and scenic habitats.** The vast majority of visitors come to parks to enjoy beautiful landscapes, wildlife and quiet time away from the hustle and bustle of everyday life. **OPRD should recognize this aspect of visitor use and only allow drone use in a small number of limited areas** that are not visited by people seeking natural qualities of the parks and that are not used by sensitive birds and other wildlife.
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Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Chieko Yoshihara

Date comment received:

February 1, 2026 07:59 PM

Commenter email (if provided):

pdxsalecy@gmail.com

Location (if provided): {city}, {state}

Public comment:

I appreciate that OPRD is working towards regulating drones in state parks. I go to state parks to enjoy nature. Drones are not part of nature and very annoying and stressful to encounter, which defeats the purpose of going to state parks. Please consider strict enforcement. Thank you.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Judy Jordan

Date comment received:

February 1, 2026 08:06 PM

Commenter email (if provided):

johnandjudyj@gmail.com

Location (if provided): {city}, {state}

Public comment:

Birds are disturbed by drones. I am disturbed by drones. I go to the beach to enjoy the waves, the birds and the beauty of the Oregon coast. I do not want small machines flying around overhead.

While I can appreciate beautiful drone footage that is used for advertising coastal towns, the drone operators should have to get permits for filming on public beaches so that the number is highly restricted.

Life is crazy as it is and I do not want to see drones on the beach.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Erin Hager

Date comment received:

February 1, 2026 09:09 PM

Commenter email (if provided):

emullark@gmail.com

Location (if provided): {city}, {state}

Public comment:

I would like to encourage the adoption of rules to maximize the protection of birds, bird habitat, and privacy for all. Specifically;

- We appreciate State Parks draft rules specifically prohibit drone use in Snowy Plover management areas. The rules should prohibit drone use in all Rocky Habitat Management Areas, Marine Reserves and Marine Protected Areas as well.
- We recommend OPRD adopt no take off and landing rules in a 0.5mi buffer in OPRD managed land adjacent to all U.S. Fish and Wildlife Service refuge and other federally lands designated to protect wildlife populations and habitats.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Christopher Gore

Date comment received:

February 1, 2026 09:30 PM

Commenter email (if provided):

cmgore@outlook.com

Location (if provided): {city}, {state}

Public comment:

I support regulations limiting use of drones in Oregon's state-managed recreation areas. Primarily I support drone usage for legitimate research purposes, conducted by recognized and officially permitted research organizations trying to understand and support the management of wildlife and public lands. I also support drone usage in emergency situations, such as search and rescue operations or law enforcement operations.

I don't support authorizing drone usage for general recreational purposes on public lands, as I see that interfering with the safety of wildlife, our stewardship of public lands, and the overall enjoyment of public members who want to enjoy recreating in the outdoors free from unnecessary distractions and annoyances.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Janet Williams

Date comment received:

February 1, 2026 09:53 PM

Commenter email (if provided):

thoreau88@yahoo.com

Location (if provided): {city}, {state}

Public comment:

How many times have I been enjoying peace and relative solitude in the midst of Nature's wonders and been painfully brought to earth by the buzz and obnoxious view of a drone? I've lost count of the times. This is an abuse of the purposes behind our state and national parks and forests and should not continue. Let them buzz all over cities, but please please keep them away from our natural areas.

I should make some specific requests, though I really wish you could keep them out of our forests and parks entirely:

Anywhere Marbled Murrelets or Snowy Plovers or Peregrines fly or nest or eat.

Marine Reserves and protected areas

Rocky Habitat Management Areas (think of the shock to a sensitive little pika)

Anywhere near Fish and Wildlife Refuges or any state refuge

Anywhere near National Forests or Parks, especially wilderness areas

Having worked for the US Forest Service for many years, I know how abusive drones can feel when you're out in the forest enjoying Nature. Please prohibit them everywhere you legally can, and don't bother with part-year closures, as that will only encourage breaking the rules all year round. This is from personal experience with forest visitors. Thank you for considering my request very carefully.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Sarah Jeffrey

Date comment received:

February 1, 2026 11:04 PM

Commenter email (if provided):

sjeffre@gmail.com

Location (if provided): {city}, {state}

Public comment:

Drones affect breeding grounds of so many birds, please do not allow



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Katherine Muldoon

Date comment received:

February 2, 2026 02:36 AM

Commenter email (if provided):

katymuldoon@me.com

Location (if provided): {city}, {state}

Public comment:

Drones disturb wildlife and humans wherever they're deployed, and their use should be severely limited in all of Oregon's natural areas, especially in state parks, just as they are in national parks. Please tighten the rules and enforce them. Thank you.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Mulysa Melco

Date comment received:

February 2, 2026 05:59 AM

Commenter email (if provided):

mulysa@resiliencedesign.com

Location (if provided): {city}, {state}

Public comment:

Dear Oregon Parks and Recreation Department,

I'm writing to urge you to restrict, or even better, prohibit drone use in Oregon State Parks. Drones disturb birds and wildlife and negatively impact nesting success and natural behaviors.

Many of our at-risk species are impacted by drone use including black oystercatcher, brown pelican, the majestic Caspian terns, peregrine falcon and other raptors, harbor seals and Steller's sea lion. These species and all of our park species deserve protection.

And it impacts the experience of parks users who enjoy nature and beautiful landscapes. Drone use is intimidating and disruptive – and poses an invasion of privacy. This is inappropriate at State Parks.

Sincerely,

Mulysa Melco



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Christine Ogura

Date comment received:

February 2, 2026 07:42 AM

Commenter email (if provided):

altsubemail@gmail.com

Location (if provided): {city}, {state}

Public comment:

Please help to protect wildlife, viewsapes, and sense of solitude and peace (quiet) of our parks by not allowing drone use in our parks. Per current prohibition, specific uses should only be allowed to further management of the park such as research and gathering of data for wildlife surveys and emergency situations for fire or rescue. Thank you.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Jeff Pricher

Date comment received:

February 2, 2026 08:48 AM

Commenter email (if provided):

jpricher@scappoosefire.gov

Location (if provided): {city}, {state}

Public comment:

Oregon Parks and Recreation Department,

Thank you for the opportunity to comment on the proposed rules related to unmanned aircraft systems (UAS). I respectfully request that you reconsider and clarify the public safety exemption, as the current draft language is narrowly tied to “emergencies” and does not reflect how public safety agencies actually operate.

Many essential public safety missions occur outside of an immediate emergency yet are critical to community safety and justice. For example, law enforcement frequently uses UAS to document fatal crash scenes after the initial emergency has ended. Prohibiting this use would significantly extend road closures and force a return to slower, less accurate legacy documentation methods. Similarly, fire agencies routinely use UAS after structure and wildland fires for investigation and burn pattern analysis. These investigations, which can be key to identifying arson and preventing future incidents, often occur well after the emergency phase is over.

Search and Rescue (SAR) operations provide another important example. SAR missions can span several days and may not resemble a traditional “lights and sirens” emergency, yet UAS with thermal imaging, low-light capability, zoom optics, and color-finding software have been instrumental in locating missing persons in challenging terrain. These operations are often methodical and prolonged, but no less vital to life safety.

Because “emergency” is not defined, and much critical public safety work happens outside of an immediate emergency response, tying UAS authority only to “emergencies” is both ambiguous and overly restrictive. Public safety agencies need clear authority to use UAS in the normal course of their official duties, including investigation, documentation, search operations, and training.

For these reasons, I respectfully offer the following alternative wording for **subsection (g)**:

- **Option 1:**

“(g) Public safety agencies and other governmental entities, when acting within the scope of their official duties, may operate unmanned aircraft systems without prior approval.”

- **Option 2:**

“(g) Public safety agencies and other governmental entities, when acting in the performance of their official duties or in the exercise of lawful authority, may operate unmanned aircraft systems without prior approval.”

These revisions preserve OPRD’s ability to manage recreational and commercial UAS use while ensuring that public safety agencies can responsibly employ UAS as a modern, proven tool to protect the public, investigate incidents, and support search and rescue operations. I offer these comments in a spirit of collaboration and am grateful for your work to balance resource protection, visitor experience, and public safety across Oregon’s parks.

Respectfully,

Jeff Pricher

Fire Chief

[Scappoose Fire District](#)



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Tim Nutley

Date comment received:

February 2, 2026 02:41 PM

Commenter email (if provided):

romanov228@comcast.net

Location (if provided): {city}, {state}

Public comment:

Hello, apparently using drones in Oregon parks and beach areas are disturbing wildlife birds, particularly those deemed fragile so lets ban drones altogether. I'd like to think we could allow drones at a particular time and location yet enforcement would be really impossible since not only there isn't available staff but also how can you tell whom is controlling the drone, so ban them altogether. Also, I find drones annoying myself with their noise and surveillance interrupting my vacation. Drones are an aggressor, the controller is a distance away so are seen as a predator and merely their presence scares wildlife (including fragile species) away from feeding and nesting. Drone operators may have little awareness (or conscience) to keep away from fragile species too, and that as well is impossible to enforce. Keep drones out of our parks entirely. That's why we have binoculars. Thank you



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Perl SITCOV

Date comment received:

February 2, 2026 05:08 PM

Commenter email (if provided):

perla.sitcov@gmail.com

Location (if provided): {city}, {state}

Public comment:

I am writing to ask that you restrict drone use in State Parks and along the coast. We should not prioritize recreational use of drones over the fragile and important habitat in our state.

Thank you.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Deb Merchant

Date comment received:

February 2, 2026 07:27 PM

Commenter email (if provided):

dame5859@icloud.com

Location (if provided): {city}, {state}

Public comment:

Drones should not be allowed in State Parks! I've seen for myself in several instances where wildlife was prevented from foraging or hunting, and sensitive vegetation was completely trampled by a drone operator lost his loud equipment in the river.

Please adopt new rules that give State Park managers adequate tools to actually regulate drone use in state parks. Because drones disturb birds and wildlife because they are perceived to be predators and are known (I've seen it happen myself) to cause significant impacts to nesting and feeding birds.

Please, OPRD, take a precautionary approach to where and when it allows drone use. Much like a dog park, let the drone users fly their gadgets in select areas where wildlife are NOT impacted; and neither are those of us who relish peace and quiet in nature.

Millions of Oregonians and out-of-state visitors enjoy Oregon's amazing state parks. **Only a small fraction of these users operate drones yet their noise and intrusion affect wildlife and scenic habitats.** The vast majority of visitors come to parks to enjoy beautiful landscapes, wildlife and quiet time away from the hustle and bustle of everyday life. **OPRD should recognize this aspect of visitor use and only allow drone use in a small number of limited areas** that are not visited by people seeking natural qualities of the parks and that are not used by sensitive birds and other wildlife.

Oregon's newly updated [State Wildlife Action Plan](#) includes over 70 at-risk species of birds and mammals, many of which are known to be negatively impacted by drones. This includes birds like the Black Oystercatcher, Brown Pelican, Caspian Tern, Peregrine Falcon and mammals including the Harbor Seal and Steller's Sea Lion.

We appreciate State Parks draft rules specifically prohibit drone use in Snowy Plover management areas. **The rules should prohibit drone use in all Rocky Habitat Management Areas, Marine Reserves and Marine Protected Areas as well.**

Please adopt no take off and landing rules in a minimum 0.5mi buffer in OPRD managed land adjacent to all U.S. Fish and Wildlife Service refuge and other federally lands designated to protect wildlife populations and habitats.

Born and raised in Oregon, I'm stunned at the massive impacts on wildlife in just the last 10 years. Please, protect the few acres and places we have where wildlife and nature can thrive!



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Robin Rodgers

Date comment received:

February 2, 2026 08:53 PM

Commenter email (if provided):

robin.mermaid@gmail.com

Location (if provided): {city}, {state}

Public comment:

- We appreciate, with the adoption of new rules, State Park managers will now have tools to actually regulate drone use in state parks.
- Drones disturb birds and wildlife because they are perceived to be predators and have been shown to cause significant impacts to nesting birds. With this in mind, we urge OPRD to take a precautionary approach to where and when it allows drone use.
- Millions of Oregonians and out-of-state visitors enjoy Oregon's amazing state parks. **Only a small fraction of these users operate drones yet their noise and intrusion affect wildlife and scenic habitats.** The vast majority of visitors come to parks to enjoy beautiful landscapes, wildlife and quiet time away from the hustle and bustle of everyday life. **OPRD should recognize this aspect of visitor use and only allow drone use in a small number of limited areas** that are not visited by people seeking natural qualities of the parks and that are not used by sensitive birds and other wildlife.
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- **We recommend OPRD adopt no take off and landing rules in a 0.5mi buffer in OPRD managed land adjacent to all U.S. Fish and Wildlife Service refuge and other federally lands** designated to protect wildlife populations and habitats.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Devin Sawicki

Date comment received:

February 2, 2026 09:31 PM

Location (if provided): {city}, {state}

Public comment:

Hello,

My name is Devin Sawicki. I am a 38-year-old disabled individual and a wheelchair user with concerns regarding proposed drone restrictions.

Prior to my injury, I was in pilot training for rotor aircraft. For the past two years, I have been flying my drone along the Oregon coast, which has allowed me to access mountains, beaches, and waterways that were previously inaccessible to me. These tools provide a level of exploration that is often otherwise limited for individuals with physical disabilities.

I believe that imposing restrictions on takeoff and landing locations will lead to unnecessary conflicts. Preset rules cannot account for the variety of scenarios a pilot must consider when choosing an operational spot. Furthermore, obscure requirements leave pilots vulnerable to confrontations with the public or law enforcement who may not understand standard aviation rules.

We should avoid creating unnecessary burdens on pilots. Maintaining flexibility allows us to focus on safety and regulatory compliance while ensuring that all individuals can continue to enjoy our natural scenery from accessible vantage points.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Lee Hunt

Date comment received:

February 2, 2026 09:32 PM

Location (if provided): {city}, {state}

Public comment:

Please consider the impacts on wildlife in regulating done use in the parks. Thank you for your work.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Christine Drommond

Date comment received:

February 2, 2026 09:33 PM

Location (if provided): {city}, {state}

Public comment:

Please regulate drone use in state parks. It disturbs important wildlife and also invades the privacy of human visitors.

Thank you.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Caroline Skinner

Date comment received:

February 2, 2026 09:33 PM

Location (if provided): {city}, {state}

Public comment:

I am writing to comment on proposed policy regarding use of drones in Oregon state parks.

Oregon Parks and Recreation Department (OPRD) is seeking public feedback on proposed rules to regulate drone take-offs and landings in Oregon State Parks and along the coast to better protect wildlife.

Improper drone use increasingly disturbs nesting seabirds and shorebirds, including endangered and at-risk species, contributing to nest failures. This is unacceptable.

We need to ensure OPRD moves forward with draft regulations with strong rules and a clear rollout plan.

I value our state parks for their natural areas including wildlife habitat, so I urge you to craft a policy that protects these important natural assets. Thank you.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

James Krier

Date comment received:

February 2, 2026 09:34 PM

Location (if provided): {city}, {state}**Public comment:**

Dear Oregon Parks and Recreation Department,

Thank you for your commitment to public service and your dedication to make parks better each year. I have been making comments about drone rulemaking for a decade now starting with emails to the outstanding Chris Havel and others. It seems like Oregon wants to get it right, however the draft rules are overly prohibitive and miss many important considerations.

Please cancel the current flawed rule making process and openly support responsible drone photography in all parks.

Why has it taken a decade? The reason is no one can figure out what problem is actually being solved... Drone photography is among the safest recreational activities, it causes less disturbances to wildlife than hiking and its content is protected under the First Amendment of the Constitution. Free speech does not stop at the park border. If ORPD wants to get it right, copy the National Forests and FAA policies. Many legitimate concerns are already covered with existing rules.

Park managers nationwide are openly discriminatory towards drone photographers in a way that is unique among recreational activities. Park managers are not trained in First Amendment protection and rarely realize photography is a free speech issue. The safety and disturbance criteria applied to drones is (purposely) impossible to meet. In Colorado, Assistant Director Heather Dugan said it best: "If a [bird] changes direction ... that's harassment ... and it's illegal." If a fish saw a boat and changed directions, would boating be banned? If a bird saw a dog in a park and left its nest, would dogs be criminalized? If someone crashed a bicycle would all biking be cancelled? Drones get smaller, quieter and safer every year, there is no evidence restrictive rules are justified when compared evenly to other activities already happening every day in Oregon parks.

The Ansel Adams of this generation will use a drone to tell the story. To cite one example, surfing journalism is nothing without photography and these days almost every surfing video you will see is a drone video. Imagine how dangerous and loud it would be to capture those images with a full scale helicopter. In the current draft of the ORPD rules, the daredevil helicopter pilot has more protections than a person flying a drone that weighs less than a pound. Additionally, you may have seen recent ICE "SOS" protests over a frozen lake in Minnesota or Ocean Beach in San Francisco. These shots of thousands of people speak to the world. Drone photography is not like free speech, it is free speech. The current ORPD rule making completely misses this point and the current rule making be scrapped until constitutional protections are understood by all park managers.

One question ORPD needs to address is whether a virtual park visitor is worthy of the same respect as a physical park visitor. ORPD impressively manages 360 sites around Oregon, we have been to many of them, but few can go to each one. The way most people will learn about each individual park is through digital content. In 50 years, when folks look back at this era of outdoor stories, they will desperately seek out drone photography. If some experiences can be shared digitally, it may reduce foot traffic in the most crowded parks.

Many activist organizations with nebulous financial backing have claimed that any drone outdoors is clearly bad for wildlife, especially birds. The scientific literature has a nuanced take on this issue. A meta-analysis (see Brisson-Curadeau 2024 in *Frontiers in Ecology and the Environment*) of over 100 peer-reviewed articles shows, when properly used, drones can be less intrusive than human presence. There has been no study that has actually shown loss of wildlife population because of recreational drones. The criticism often comes from people who are frustrated by the idea of any motorized device. In the early 2000s, some people wanted to ban cell phones from parks. Freedom does not start where fear stops.

ORPD is obsessed with drones for some strange reason. Why not focus on factors impacting habitat loss outside park borders? Or overcrowding in parks? Or domestic dogs, E-bikes, horse riding, camp fires, civil aviation, parasailing or motor boating? None of these are present in pure wilderness and they all have impacts. It is easy to turn unorganized drone photographers into the straw man for the frustrations of modern life. It is hard to push real change that makes a difference.

Thank you for considering these comments.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Lisa Gloor

Date comment received:

February 2, 2026 09:35 PM

Location (if provided): {city}, {state}

Public comment:

Hello -

I wanted to voice my support of regulating drone use in state parks.

Drones disturb birds and wildlife because they are perceived to be predators and have been shown to cause significant impacts to nesting birds. With this in mind, I would join the others urging OPRD to take a precautionary approach to where and when it allows drone use.

Among the millions of people who enjoy Oregon's state parks every year, only a small fraction of them fly drones. Yet the impact is significant and destructive for wildlife. People come to enjoy natural beauty and wildlife. And beyond just our enjoyment of wild and scenic areas, it is our responsibility to protect species that desperately need our protection as human development increasingly encroaches on their habitat.

OPRD should allow drone use in a small number of limited areas, particularly excluding those that are used by sensitive birds and other wildlife. Oregon's newly updated State Wildlife Action Plan includes over 70 at-risk species of birds and mammals, many of which are known to be negatively impacted by drones. This includes birds like the Black Oystercatcher, Brown Pelican, Caspian Tern, Peregrine Falcon and mammals including the Harbor Seal and Steller's Sea Lion. I appreciate that the State Parks draft rules specifically prohibit drone use in Snowy Plover management areas. The rules should prohibit drone use in all Rocky Habitat Management Areas, Marine Reserves and Marine Protected Areas as well.

I support the recommendation that OPRD adopt no take off and landing rules in a 0.5mi buffer in OPRD managed land adjacent to all U.S. Fish and Wildlife Service refuge and other federally lands designated to protect wildlife populations and habitats.

Thank you for your consideration



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Katy Lukas

Date comment received:

February 2, 2026 09:36 PM

Location (if provided): {city}, {state}

Public comment:

To whom it may concern,

I appreciate, with the adoption of new rules, State Park managers will now have tools to actually regulate drone use in state parks.

Drones disturb birds and wildlife because they are perceived to be predators and have been shown to cause significant impacts to nesting birds. With this in mind, we urge OPRD to take a precautionary approach to where and when it allows drone use.

Millions of Oregonians and out-of-state visitors enjoy Oregon's amazing state parks. Only a small fraction of these users operate drones yet their noise and intrusion affect wildlife and scenic habitats. The vast majority of visitors come to parks to enjoy beautiful landscapes, wildlife and quiet time away from the hustle and bustle of everyday life. OPRD should recognize this aspect of visitor use and only allow drone use in a small number of limited areas that are not visited by people seeking natural qualities of the parks and that are not used by sensitive birds and other wildlife.

Oregon's newly updated State Wildlife Action Plan includes over 70 at-risk species of birds and mammals, many of which are known to be negatively impacted by drones. This includes birds like the Black Oystercatcher, Brown Pelican, Caspian Tern, Peregrine Falcon and mammals including the Harbor Seal and Steller's Sea Lion.

I appreciate State Parks draft rules specifically prohibit drone use in Snowy Plover management areas. The rules should prohibit drone use in all Rocky Habitat Management Areas, Marine Reserves and Marine Protected Areas as well.

I recommend OPRD adopt no take off and landing rules in a 0.5mi buffer in OPRD managed land adjacent to all U.S. Fish and Wildlife Service refuge and other federally lands designated to protect wildlife populations and habitats.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Courtney Giordano

Date comment received:

February 2, 2026 09:37 PM

Location (if provided): {city}, {state}

Public comment:

To whom it may concern,

We appreciate, with the adoption of new rules, State Park managers will now have tools to actually regulate drone use in state parks.

Drones disturb birds and wildlife because they are perceived to be predators and have been shown to cause significant impacts to nesting birds. With this in mind, we urge OPRD to take a precautionary approach to where and when it allows drone use.

Millions of Oregonians and out-of-state visitors enjoy Oregon's amazing state parks. Only a small fraction of these users operate drones yet their noise and intrusion affect wildlife and scenic habitats. **The vast majority of visitors come to parks to enjoy beautiful landscapes, wildlife and quiet time away from the hustle and bustle of everyday life. OPRD should recognize this aspect of visitor use and only allow drone use in a small number of limited areas that are not visited by people seeking natural qualities of the parks and that are not used by sensitive birds and other wildlife.**

Oregon's newly updated State Wildlife Action Plan includes over 70 at-risk species of birds and mammals, many of which are known to be negatively impacted by drones. This includes birds like the Black Oystercatcher, Brown Pelican, Caspian Tern, Peregrine Falcon and mammals including the Harbor Seal and Steller's Sea Lion.

We appreciate State Parks draft rules specifically prohibit drone use in Snowy Plover management areas. The rules should prohibit drone use in all Rocky Habitat Management Areas, Marine Reserves and Marine Protected Areas as well.

We recommend OPRD adopt no take off and landing rules in a 0.5mi buffer in OPRD managed land

adjacent to all U.S. Fish and Wildlife Service refuge and other federally lands designated to protect wildlife populations and habitats.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Kimberly Hillman

Date comment received:

February 2, 2026 09:37 PM

Location (if provided): {city}, {state}

Public comment:

Hello,

We appreciate, with the adoption of new rules, State Park managers will now have tools to actually regulate drone use in state parks.

Drones disturb birds and wildlife because they are perceived to be predators and have been shown to cause significant impacts to nesting birds. With this in mind, we urge OPRD to take a precautionary approach to where and when it allows drone use.

Millions of Oregonians and out-of-state visitors enjoy Oregon's amazing state parks. **Only a small fraction of these users operate drones yet their noise and intrusion affect wildlife and scenic habitats.** The vast majority of visitors come to parks to enjoy beautiful landscapes, wildlife and quiet time away from the hustle and bustle of everyday life. **OPRD should recognize this aspect of visitor use and only allow drone use in a small number of limited areas** that are not visited by people seeking natural qualities of the parks and that are not used by sensitive birds and other wildlife.

Oregon's newly updated [State Wildlife Action Plan](#) includes over 70 at-risk species of birds and mammals, many of which are known to be negatively impacted by drones. This includes birds like the Black Oystercatcher, Brown Pelican, Caspian Tern, Peregrine Falcon and mammals including the Harbor Seal and Steller's Sea Lion.

We appreciate State Parks draft rules specifically prohibit drone use in Snowy Plover management areas. **The rules** should prohibit drone use in all Rocky Habitat Management Areas, Marine Reserves and Marine Protected Areas as well.

We recommend OPRD adopt no take off and landing rules in a 0.5mi buffer in OPRD managed land adjacent to all U.S. Fish and Wildlife Service refuge and other federally lands designated to protect wildlife populations and habitats.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Kari Boss

Date comment received:

February 2, 2026 09:38 PM

Location (if provided): {city}, {state}

Public comment:

- We appreciate, with the adoption of new rules, State Park managers will now have tools to actually regulate drone use in state parks.
- Drones disturb birds and wildlife because they are perceived to be predators and have been shown to cause significant impacts to nesting birds. With this in mind, we urge OPRD to take a precautionary approach to where and when it allows drone use.
- Millions of Oregonians and out-of-state visitors enjoy Oregon's amazing state parks. **Only a small fraction of these users operate drones yet their noise and intrusion affect wildlife and scenic habitats.** The vast majority of visitors come to parks to enjoy beautiful landscapes, wildlife and quiet time away from the hustle and bustle of everyday life. **OPRD should recognize this aspect of visitor use and only allow drone use in a small number of limited areas** that are not visited by people seeking natural qualities of the parks and that are not used by sensitive birds and other wildlife.
- Oregon's newly updated **State Wildlife Action Plan** includes over 70 at-risk species of birds and mammals, many of which are known to be negatively impacted by drones. This includes birds like the Black Oystercatcher, Brown Pelican, Caspian Tern, Peregrine Falcon and mammals including the Harbor Seal and Steller's Sea Lion.
- We appreciate State Parks draft rules specifically prohibit drone use in Snowy Plover management areas. **The rules should prohibit drone use in all Rocky Habitat Management Areas, Marine Reserves and Marine Protected Areas as well.**
- **We recommend OPRD adopt no take off and landing rules in a 0.5mi buffer in OPRD managed land adjacent to all U.S. Fish and Wildlife Service refuge and other federally lands** designated to protect wildlife populations and habitats.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Anne Marie DiStefano

Date comment received:

February 2, 2026 09:38 PM

Location (if provided): {city}, {state}

Public comment:

Hello: After personally witnessing a drone harassing a bald eagle, I urge you to pass strong rules to protect wildlife from drones.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Sandra Joos

Date comment received:

February 2, 2026 09:39 PM

Location (if provided): {city}, {state}

Public comment:

I appreciate the State Parks draft rules that specifically prohibit drone use in Snowy Plover management areas. However, **the rules should prohibit drone use in all Rocky Habitat Management Areas, Marine Reserves and Marine Protected Areas as well.**

Thus, OPRD should adopt no take off and landing rules in a 0.5mi buffer in OPRD managed land adjacent to all U.S. Fish and Wildlife Service refuge and other federally lands designated to protect wildlife populations and habitats.

Thank you for protecting wildlife for us all!



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Pendarvia

Date comment received:

February 2, 2026 09:39 PM

Location (if provided): {city}, {state}

Public comment:

Please restrict drones!



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Jean Butcher

Date comment received:

February 2, 2026 09:40 PM

Location (if provided): {city}, {state}

Public comment:

Dear OPRD,

I appreciate your work to formulate rules for drone use at Oregon's amazing state parks. A very small percentage of the visitors to our precious natural places operate these drones, and I am counting on you to make sure that vulnerable wildlife and those of us who really need uninterrupted time and peace in natural areas can find it easily. The needs of the natural world and the many must outweigh the wants of a few.

This is important work for our communities and for our world.

Thank you for your careful consideration and for your work.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

S Hall

Date comment received:

February 2, 2026 09:40 PM

Location (if provided): {city}, {state}

Public comment:

To OPRD:

I appreciate, with the adoption of new rules, State Park managers will now have tools to actually regulate drone use in state parks. Please consider the points below to restrict drone use:

- Drones disturb birds and wildlife because they are perceived to be predators and have been shown to cause significant impacts to nesting birds. With this in mind, we urge OPRD to take a precautionary approach to where and when it allows drone use.
- Millions of Oregonians and out-of-state visitors enjoy Oregon's amazing state parks. **Only a small fraction of these users operate drones yet their noise and intrusion affect wildlife and scenic habitats.** The vast majority of visitors come to parks to enjoy beautiful landscapes, wildlife and quiet time away from the hustle and bustle of everyday life. **OPRD should recognize this aspect of visitor use and only allow drone use in a small number of limited areas** that are not visited by people seeking natural qualities of the parks and that are not used by sensitive birds and other wildlife.
- Oregon's newly updated [State Wildlife Action Plan](#) includes over 70 at-risk species of birds and mammals, many of which are known to be negatively impacted by drones. This includes birds like the Black Oystercatcher, Brown Pelican, Caspian Tern, Peregrine Falcon and mammals including the Harbor Seal and Steller's Sea Lion.
- I appreciate State Parks draft rules specifically prohibit drone use in Snowy Plover management areas. **The rules should prohibit drone use in all Rocky Habitat Management Areas, Marine Reserves and Marine Protected Areas as well.**
- **I recommend OPRD adopt no take off and landing rules in a 0.5mi buffer in OPRD managed land adjacent to all U.S. Fish and Wildlife Service refuge and other federally lands** designated to protect wildlife populations and habitats.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Marilyn Danese Dunham

Date comment received:

February 2, 2026 09:41 PM

Location (if provided): {city}, {state}

Public comment:

I support banning all drones from parks and wildlife areas unless they are permitted for wildlife research by accredited organizations and individuals.

Oregon public park spaces should not assume a lack of privacy the way urban streets do. Parks and wildlife refuges offer respite from people watching, especially in the secluded areas preferred by wildlife.

I totally support the proposed UAS rules for Oregon parks as drafted by the Rules Advisory Committee.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Jeff Pricher

Date comment received:

February 2, 2026 09:43 PM

Commenter email (if provided):

jpricher@scappoosefire.gov

Location (if provided): {city}, {state}

Public comment:

Oregon Parks and Recreation Department,

Thank you for the opportunity to comment on the proposed rules related to unmanned aircraft systems (UAS). I respectfully request that you reconsider and clarify the public safety exemption, as the current draft language is narrowly tied to “emergencies” and does not reflect how public safety agencies actually operate.

Many essential public safety missions occur outside of an immediate emergency yet are critical to community safety and justice. For example, law enforcement frequently uses UAS to document fatal crash scenes after the initial emergency has ended. Prohibiting this use would significantly extend road closures and force a return to slower, less accurate legacy documentation methods. Similarly, fire agencies routinely use UAS after structure and wildland fires for investigation and burn pattern analysis. These investigations, which can be key to identifying arson and preventing future incidents, often occur well after the emergency phase is over.

Search and Rescue (SAR) operations provide another important example. SAR missions can span several days and may not resemble a traditional “lights and sirens” emergency, yet UAS with thermal imaging, low-light capability, zoom optics, and color-finding software have been instrumental in locating missing persons in challenging terrain. These operations are often methodical and prolonged, but no less vital to life safety.

Because “emergency” is not defined, and much critical public safety work happens outside of an immediate emergency response, tying UAS authority only to “emergencies” is both ambiguous and overly restrictive. Public safety agencies need clear authority to use UAS in the normal course of their official duties, including investigation, documentation, search operations, and training.

For these reasons, I respectfully offer the following alternative wording for **subsection (g)**:

- **Option 1:**

“(g) Public safety agencies and other governmental entities, when acting within the scope of their official duties, may operate unmanned aircraft systems without prior approval.”

- **Option 2:**

“(g) Public safety agencies and other governmental entities, when acting in the performance of their official duties or in the exercise of lawful authority, may operate unmanned aircraft systems without prior approval.”

These revisions preserve OPRD’s ability to manage recreational and commercial UAS use while ensuring that public safety agencies can responsibly employ UAS as a modern, proven tool to protect the public, investigate incidents, and support search and rescue operations. I offer these comments in a spirit of collaboration and am grateful for your work to balance resource protection, visitor experience, and public safety across Oregon’s parks.

Respectfully,
Jeff Pricher
Fire Chief



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Kenlynn & Stephen Hamilton

Date comment received:

February 2, 2026 09:43 PM

Location (if provided): {city}, {state}

Public comment:

- We appreciate, with the adoption of new rules, State Park managers will now have tools to actually regulate drone use in state parks.
- Drones disturb birds and wildlife because they are perceived to be predators and have been shown to cause significant impacts to nesting birds. With this in mind, we urge OPRD to take a precautionary approach to where and when it allows drone use.
- Millions of Oregonians and out-of-state visitors enjoy Oregon's amazing state parks. **Only a small fraction of these users operate drones yet their noise and intrusion affect wildlife and scenic habitats.** The vast majority of visitors come to parks to enjoy beautiful landscapes, wildlife and quiet time away from the hustle and bustle of everyday life. **OPRD should recognize this aspect of visitor use and only allow drone use in a small number of limited areas** that are not visited by people seeking natural qualities of the parks and that are not used by sensitive birds and other wildlife.
- Oregon's newly updated **State Wildlife Action Plan** includes over 70 at-risk species of birds and mammals, many of which are known to be negatively impacted by drones. This includes birds like the Black Oystercatcher, Brown Pelican, Caspian Tern, Peregrine Falcon and mammals including the Harbor Seal and Steller's Sea Lion.
- We appreciate State Parks draft rules specifically prohibit drone use in Snowy Plover management areas. **The rules should prohibit drone use in all Rocky Habitat Management Areas, Marine Reserves and Marine Protected Areas as well.**
- **We recommend OPRD adopt no take off and landing rules in a 0.5mi buffer in OPRD managed land adjacent to all U.S. Fish and Wildlife Service refuge and other federally lands** designated to protect wildlife populations and habitats.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Sandra

Date comment received:

February 2, 2026 09:43 PM

Location (if provided): {city}, {state}

Public comment:

Please enact legislation to stop drones in Oregon state parks; do not disturb wildlife or restorative nature views and quiet.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Robert Nimmo

Date comment received:

February 2, 2026 09:44 PM

Location (if provided): {city}, {state}

Public comment:

I want to add my family's strong support for restricting drone use in sensitive wildlife areas. Specifically this means prohibiting drones overflying, landing, taking off in or close to US Fish and Wildlife refuges and State Park sensitive wildlife areas - Rocky Habitat Management areas, Marine Reserves, Marine Protected areas.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Michelle Casey

Date comment received:

February 2, 2026 09:46 PM

Location (if provided): {city}, {state}

Public comment:

Hello Oregon Parks and Recreation Department (OPRD),

- We appreciate, with the adoption of new rules, State Park managers will now have tools to actually regulate drone use in state parks.
- Drones disturb birds and wildlife because they are perceived to be predators and have been shown to cause significant impacts to nesting birds. With this in mind, we urge OPRD to take a precautionary approach to where and when it allows drone use.
- Millions of Oregonians and out-of-state visitors enjoy Oregon’s amazing state parks. Only a small fraction of these users operate drones yet their noise and intrusion affect wildlife and scenic habitats. The vast majority of visitors come to parks to enjoy beautiful landscapes, wildlife and quiet time away from the hustle and bustle of everyday life. OPRD should recognize this aspect of visitor use and only allow drone use in a small number of limited areas that are not visited by people seeking natural qualities of the parks and that are not used by sensitive birds and other wildlife.
- Oregon’s newly updated [State Wildlife Action Plan](#) includes over 70 at-risk species of birds and mammals, many of which are known to be negatively impacted by drones. This includes birds like the Black Oystercatcher, Brown Pelican, Caspian Tern, Peregrine Falcon and mammals including the Harbor Seal and Steller’s Sea Lion.
- We appreciate State Parks draft rules specifically prohibit drone use in Snowy Plover management areas. The rules should prohibit drone use in all Rocky Habitat Management Areas, Marine Reserves and Marine Protected Areas as well.
- We recommend OPRD adopt no take off and landing rules in a 0.5mi buffer in OPRD

managed land adjacent to all U.S. Fish and Wildlife Service refuge and other federally lands designated to protect wildlife populations and habitats.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Bruce Barbarasch

Date comment received:

February 3, 2026 03:41 AM

Commenter email (if provided):

bruce.barbarasch@runbox.com

Location (if provided): {city}, {state}

Public comment:

I appreciate OPRD's interest in regulating drones and I'm glad park staff will have tools to enforce regulations. I am writing to restrict drone usage to the maximum extent possible. They are noisy, annoying and selfish. Most users aren't flying drones, and the few that do cause people to pause and wonder what that strange sound is, rather than listening to nature or enjoying time with friend and family. Further, drones are bad news for wildlife. Birds take off, mammals stop foraging, all of them waste energy and risk their safety due to drones flying too close. Please limit drone use to non-wildlife areas and places where few regular visitors are. Drones should definitely be banned from marine reserves, rocky habitat management areas, and other protected areas and should be limited from areas adjacent to federal lands.

Thanks for your consideration.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Christopher Wille

Date comment received:

February 3, 2026 06:39 PM

Commenter email (if provided):

chris@chriswille.net

Location (if provided): {city}, {state}

Public comment:

Thank you for accepting comments on the proposed restrictions on drones use on OPRD-managed lands and along the shore.

As an Oregonian, biologist, birdwatcher and beach lover, I strongly support banning drones on public lands, especially on the coast. The impact on feeding and nesting birds, some endangered, is obvious to even a casual observer and well-documented by researchers.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Paul Hosey

Date comment received:

February 3, 2026 07:36 PM

Commenter email (if provided):

p.hosey@comcast.net

Location (if provided): {city}, {state}

Public comment:

I am in full agreement that OPRD should adopt strong rules limiting the places where drone use is allowed. Both wildlife and humans need protection from the intrusion of this technology. In emergencies such as search and rescue operations it should be allowed to aid in finding lost or injured persons.

Otherwise these wild places must be left to be as wild and quiet as possible. Wildlife perceives these machines as predators and they create unnecessary stress.

Thank you for helping protect and preserve these precious and important places.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Tim Palmer

Date comment received:

February 4, 2026 12:20 AM

Commenter email (if provided):

tim@timpalmer.org

Location (if provided): {city}, {state}

Public comment:

With great attachment to our State Parks, I thank you for the chance to comment about policies regarding drone takeoffs and landings in the parks, and about the effects of drones on all park users as well as on wildlife that many of us cherish.

I come to this issue as a long-term resident of our state and our coast, and as an author and photographer of books that have led me to focus directly on the essence of our state parks and their values. While writing and photographing *Oregon: Preserving the Spirit and Beauty of Our Land*; *Rivers of Oregon*; *Field Guide to Oregon Rivers*; *The Columbia*, and other books, I've constantly been reminded how valuable and irreplaceable our state parks are to all people.

Let me say, first, that web sites for park agencies in other states and direct telephone contact nationwide have indicated to me that 22 other states have a ban or virtual ban on drone use in their state parks, and 31 have either a ban or a very restricted policy regarding drones. While ORPD's current proposed policy is to allow drone takeoff and landing only where explicitly permitted, today's proposal does not indicate how much of our park lands will ultimately be open to or, conversely, protected from drone intrusions. And, as we all know, the Department's original proposal was far more permissive—allowing drones wherever they were not explicitly barred. So, other than commenting on process and procedure at this time, it's difficult to foresee how this issue will ultimately be resolved.

To delve a bit deeper into what I've learned, the bans or virtual bans on drone use in state parks have been enacted in Arizona, Arkansas, Colorado, Connecticut, Florida, Georgia, Hawaii, Indiana, Maine, Minnesota, Nebraska, Nevada, New Hampshire, New Jersey, North Carolina, Ohio, Oklahoma, Rhode Island, Tennessee, Texas, Virginia, and Wisconsin. Highly restricted drone use is conditionally allowed in 9 other states, including Pennsylvania, where, for example, drones are allowed only by special permit and only in “remote controlled airfields,” which are located in only 6 among 124 state parks.

In looking for guidance, expectations, and experience regarding this issue, we should consider not only those 31 other states, but also the National Park Service, which takes seriously its responsibility to protect park resources and visitors. That premier parks agency of America—with legislative mandates similar to our own Parks and Recreation Department—flatly bans drone use for all but official park purposes. Yet our own State Parks are just as valuable as those National Parks are, and our parks are appreciated by Oregonians every bit as much. The model of National Park protection is not too much for us to strive for in our own Oregon parks.

Though the Department has done no surveys that I'm aware of, I think it's fair to say that the vast majority of park visitors, totaling 53 million user days a year, hate seeing and hearing drones in the parks and along our beaches, the same way that we would be aggrieved to see and hear those devices buzzing over our own homes and backyard swimming pools with persistent violations of noise, with wildlife disturbance, and with invasion of personal privacy by these devices that might be presumed to be carrying a camera.

Oregon residents legitimately expect our parks to be refuges and sanctuaries for the nature of our state, and as refuges for all of us who value that nature. We go to the parks for a peaceful walk in the woods, for a beautiful landscape scene, for a contemplative view out to sea. Who would welcome the stress that drones cause to wildlife—plainly evident when birds fly in panic and leave their nests unattended at the approach of a drone? Specific and verifiable impacts on birds have been clearly documented elsewhere, as pointed out in other testimonies to the Department at this time. Those concerns are especially relevant when we consider that the limited area of our state parks constitutes much of the very best of Oregon's natural environment, from the Columbia River to California.

Since the Department has not conducted polls of public opinion, the closest thing we have might be a telephone survey done by radio station 1600 am KOHI in St. Helens, which asked for opinion on the matter. The station received 110 calls and announced that no one wanted to see drones in our state parks. This was reported to ORPD by KOHI and appears in the Department's Jan. 23, 2026 tabulation of public comments on the drone issue.

I visit one of the coast's state parks almost daily, and while I see hundreds of visitors per year, I am yet, in twenty-four years of living near the border of that great state park, to see a single drone operator. But the peace and quiet that I experience here is sadly not the case at many other parks. My point here regarding my local park is that drone users represent a miniscule portion of total state park users. Yet, unlike other activities including hiking, camping, walking, swimming, wildlife watching, fishing, and paddling—which all have only nominal impacts on other users—the noise and widespread intrusion of drones would sacrifice the rights of virtually all other people and also the needs of wildlife throughout the park system.

An extremely small percentage of park visitors fly drones, yet their footprint, so to speak, is outsized. This is because they make noise heard across a widespread area and because they can fly virtually anywhere in the airspace overhead.

For all of us along the Oregon Coast, and elsewhere, it's also important to recognize that OPRD's regulatory responsibilities regarding drones apply not only to state parks but also to much additional mileage along the Oregon Coast where people seek peace and the sounds of surf rather than the whines of drones, and also where so many critical habitats are located for birds such as the imperiled snowy plover, and black oystercatchers which, among others, are known to be disturbed by drone use. See the testimonies of others making comments to you about this issue.

It's also important to recognize that drones can be used in many other places. In fact, to my knowledge, most of Oregon's 63 million acres have no explicit ban on drones. Our state parks account for less than two-tenths of one percent of Oregon's land area, so shouldn't this tiny fraction of our natural estate be protected from unnecessary mechanical devices that are intrusive to so many but used by so few among the general public?

The legislature has tasked the Department to come up with a plan for drones, however, the protection of the parks' wildlife and of the experience of all other visitors and park users were clearly the priority of the lawmakers at the time when Senate Bill 109 was introduced and passed. This has been confirmed to the Department by Senator Jeff Golden—Chair of the Senate committee that passed the bill.

While some people might think that the Department has to accommodate all conceivable park users, it doesn't. Where do we allow stock car racing in state parks? And if it were allowed, surely it would be permitted only in a very limited place, where the noise would not affect the park experience of others. How widespread are rifle shooting ranges in our state parks? Or consider a group that vastly outnumbers drone users: hunters. Yet hunting is not allowed in most of our state parks.

In evaluating public comments to this particular round of the Department's proposed regulations, it's evident that the vast majority of comments coming in to the Department favor a ban or very tight restriction on drone use throughout the park system. Furthermore, regarding public input, it's important to realize how many of the pro-drone comments in the past have come from out-of-state sources. And it's even more revealing to know that during your last round of public comments on this issue, in 2022, an organized, orchestrated effort was made to flood the Department's comments file with out-of-state, pro-drone viewpoints. This was done in a targeted effort to make Oregon a nationwide "model" of permissive rulemaking that could then be leveraged for application to other state park systems, coast to coast. The drone industry is obviously advocating for laissez faire drone regulation in Oregon parks because it believes that we in Oregon are an easy target for a vested interest influence. If anyone doubts this, I urge you to watch the Drone Service Providers Alliance's "call to action," which was directed at its national list at the height of the earlier OPRD comment period on Feb. 17, 2022. Drone spokesmen specifically identified the need to influence Oregon policy as a way to open drone use at state parks nationwide. The spokesmen said, "We need to set the model for drones in state parks across the nation." See <https://dspalliance.org/call-to-action-oregon-state-parks/?fbclid=IwAR18ac-umKlPk7b4fNiP2mgQjtqhPjCj90UNWtrezPLQv8bAs6lhD4BTeOc>

If readers here remain unconvinced that interests outside Oregon are seeking to influence Oregon State Park policy without regard for the problems entailed, and without regard to the view of the vast majority of Oregon's park users, note that on March 1, 2022, the Academy of Model Aeronautics—an organization of model aircraft and drone enthusiasts based in Muncie, Indiana—also put out an alert asking members to send comments to OPRD: "What happens in Oregon could set a precedent for other state parks and recreational areas throughout the country." <https://amablog.modelaircraft.org/amagov/2022/03/01/oregon-state-parks-propose-new-rules-for-drones-and-model-aircraft/> See also the internet post on the website of MavicPilots (a drone business) on April 4, 2022, by an individual who identifies himself as the legislative affairs director for a drone advocacy group (UAS Colorado): <https://mavicpilots.com/threads/oregon-drone-owners-we-need-your-help-pronto.124297/> His post sought support from nationwide drone users "even if you don't live in Oregon," and he urged them to comment favorably on OPRD's previously permissive policy proposal for drones. Regarding OPRD's previous drone regulation proposal, the group announced, "If we can get 100

people to comment positively for drones by 4/7/22, we can get this passed.”

And now, in 2026, the out-of-state pressure continues. Coming from Seattle on "Drone Pilot MBA," the Aerial Northwest Photography Services media producers and aviators YouTube program announced, "Even if you don't fly in Oregon, the process here could become a model for future drone regulations at parks across the country."

Regretfully, the Department's tabulation of drone rule viewpoints do not identify what comments came from Oregonians and actual Oregon park users compared to people from other states who may never come here, and that tabulation is difficult to do because the Department did not request that commenters include their physical address.

Not the least of concerns is that approvals of drone use would put us all on the path of fighting over our parks and beaches mile by mile, acre by acre, year by year, from now through the foreseeable future. The problems of drones will divert park staff from the jobs they need to do. That loss is unnecessary and would be an anomaly in the otherwise distinguished history of our State Parks. Who, among the Department's overworked staff, will interpret complex guidelines or enforce the rules? Who will police the conflicts that will ensue among park users? And how will that be done? What other essential tasks will be neglected in order to administer an unfunded, unstaffed system of variable park regulations? All of that conflict is unnecessary and would be tragic in the future prospects for our parks--challenging enough as it already is. Depending on the choices that the Oregon State Parks and Recreation Commission will be making, future chroniclers could rate drone-permitting decisions at this time as a regretful low spot in state park history that is otherwise renowned for protection by Oregon heroes such as Samuel Boardman and Oswald West.

Oregon's State Parks have benefitted from a rich and illustrious history of concern, respect, and high-minded justice by elected officials, park professionals, and every-day citizens who have stood up to protect the very best of our state and to safeguard and expand a park system that has been the envy of all America. At this point in time, the work of park protectors in the past deserves better than to be sacrificed to the drone of drones.

I urge the Department to rise to the challenge and take seriously your official mission "to provide and protect outstanding natural, scenic, cultural, historic and recreational sites for the enjoyment and education of present and future generations." To meet this goal we need to follow the lead of other states and of the National Park Service in banning or at least tightly limiting recreational use of drones. Otherwise, those of us who have cherished and defended these public lands will end up with drones unconscionably degrading one of the finest things about living in Oregon—the very nature of our State Parks.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Blaine Ackley

Date comment received:

February 4, 2026 12:23 AM

Location (if provided): {city}, {state}

Public comment:

To whom it may concern:

I cannot see how anyone should be able to use drones in any Oregon State Parks or Natural Areas except for law enforcement or official searches for those folks who are lost, injured, or in need of assistance.

When I go to a state park, I expect that visit to be private except to those around me within my eyesight. Anything else is an invasion of my privacy. We are running out of private spaces in public spaces and I think we have to make sure people feel safe and secure when they visit state parks.

We know from recent ICE activities that anyone can use facial recognition technology to identify people and retrieve personal information about them. This is wrong or should be wrong in all public spaces. There is a federal lawsuit about this very question coming from ICE activities in Minnesota and here in Oregon.

Please keep our state parks safe and free of outside interference.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Nancy J. Knight

Date comment received:

February 4, 2026 12:24 AM

Location (if provided): {city}, {state}

Public comment:

OPRD,

Please regulate drone take-offs and landings within State Parks and along the ocean shore.

- We appreciate, with the adoption of new rules, State Park managers will now have tools to actually regulate drone use in state parks.
- Drones disturb birds and wildlife because they are perceived to be predators and have been shown to cause significant impacts to nesting birds. With this in mind, we urge OPRD to take a precautionary approach to where and when it allows drone use.
- Millions of Oregonians and out-of-state visitors enjoy Oregon's amazing state parks. **Only a small fraction of these users operate drones yet their noise and intrusion affect wildlife and scenic habitats.** The vast majority of visitors come to parks to enjoy beautiful landscapes, wildlife and quiet time away from the hustle and bustle of everyday life. **OPRD should recognize this aspect of visitor use and only allow drone use in a small number of limited areas** that are not visited by people seeking natural qualities of the parks and that are not used by sensitive birds and other wildlife.
- Oregon's newly updated [State Wildlife Action Plan](#) includes over 70 at-risk species of birds and mammals, many of which are known to be negatively impacted by drones. This includes birds like the Black Oystercatcher, Brown Pelican, Caspian Tern, Peregrine Falcon and mammals including the Harbor Seal and Steller's Sea Lion.
- We appreciate State Parks draft rules specifically prohibit drone use in Snowy Plover management areas. **The rules should prohibit drone use in all Rocky Habitat Management Areas, Marine Reserves and Marine Protected Areas as well.**
- **We recommend OPRD adopt no take off and landing rules in a 0.5mi buffer in OPRD managed land adjacent to all U.S. Fish and Wildlife**

Service refuge and other federally lands designated to protect wildlife populations and habitats.

Thank you,
Nancy J. Knight



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Joren Lyons

Date comment received:

February 4, 2026 12:25 AM

Location (if provided): {city}, {state}

Public comment:

Dear OPRD,

Thank you for the opportunity to comment on the proposed regulation of "Unmanned Aircraft System Operation Areas." Overuse of drones by a small minority of coastal visitors degrades the experience of other visitors, as well as endangering wildlife, particularly nesting birds. I strongly support robust regulation of drone usage, with the understanding that there should be reasonable access to specified spaces where drone use is permitted, other areas where seasonal drone use is acceptable, and areas where drone use is off limits year-round.

Thank you,
Joren Lyons



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Cynthia Sherman

Date comment received:

February 4, 2026 12:25 AM

Location (if provided): {city}, {state}

Public comment:

Millions of Oregonians and out-of-state visitors enjoy Oregon's amazing state parks. **Only a small fraction of these users operate drones yet their noise and intrusion affect wildlife and scenic habitats.** The vast majority of visitors come to parks to enjoy beautiful landscapes, wildlife and quiet time away from the hustle and bustle of everyday life. **OPRD should recognize this aspect of visitor use and only allow drone use in a small number of limited areas** that are not visited by people seeking natural qualities of the parks and that are not used by sensitive birds and other wildlife

Thank you for making our parks enjoyable for everyone and for protecting our precious wildlife.

Cynthia Sherman
Troutdale, Oregon



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Brenda Holmes Stanciu

Date comment received:

February 4, 2026 12:26 AM

Location (if provided): {city}, {state}

Public comment:

Hello. My name is Brenda Holmes Stanciu and I live in Warrenton, OR 97146.

I wanted to make comments concerning the research into the possibility of changing drone use in Oregon state parks.

Drones have a significant impact to nesting birds. There is a very small number of park users that use this equipment, but yet it greatly affects bird populations and other visitor experiences.

The Oregon state wildlife action plan include 70 different species that are at risk. All of these animals deserve our protection. I myself have observed the negative impact of drone use. I have seen this specifically at Depoe Bay and at Haystack rock in Cannon Beach. Nesting species, many of them on watch lists or listed as species of concern, will abandon eggs and young chicks either to flee for their own safety or to defend the egg. Other birds, often gulls, will then take the opportunity to attack both eggs and chicks. We see this repeatedly occur. In Depoe Bay, I had to request a visitor to pull their drone in. I have video of the mated pair of oyster catchers attacking (literally together going after the drone repeatedly) the drone after they had left their recently hatched chicks below on the ground. This took 5 to 10 minutes. These chicks, by boiler bay, had recently been photographed by the volunteers observing and assigned to observing those nests in that area.

Drone use near Haystack rock in Cannon Beach often drives the common murre to flee the rock, enabling gulls to take advantage of the opportunity, and of course, nestlings and eggs are often jostled during the mass flight off the rock.

These birds in particular have been more affected by bald eagles recently, so they added visits by the drones increase the probability of hatching loss.

Drones are supposed to give specific guidance and often the information provided to the drone operator on their screen is confusing and or incorrect. It is inconsistent and often incorrect so even a drone operator who would like to do the correct thing is ill informed.

Visitors do not enjoy having a drone flying above their heads. It is disruptive, it is taking away from their outdoor experience, and it is unsettling for what reason the video is being captured. Of course, these visitors also have not given permission for their faces, etc., to be used, but there is no way to control the situation in that moment.

I am requesting the adoption of a no takeoff and landing in a half mile buffer (I would love for that to be a 1 mile buffer) in all managed lands adjacent to all US fish and wildlife refuges and other federal lands. There is already prohibited use of drones for snowy plover managed areas. Our other species of concern need to have need to have the same protections.

Please feel free to reach out if more information is needed. Below is video (hopefully it will send) showing disruption of the oyster catchers at Boiler Bay.

Brenda Holmes Stanciu



Submit a public comment on a rule

Oregon Parks and Recreation Department

Date comment received:

February 4, 2026 12:35 AM

Commenter email (if provided):

wk@klgpc.com

Location (if provided): {city}, {state}

Public comment:

Please accept these comments submitted on behalf of the Association for Uncrewed Vehicle Systems International, Cascade Chapter (AUVSI Cascade), concerning the proposed OAR Chapter 736 rules governing unmanned aircraft systems (“UAS”) on Oregon Parks and Recreation Department (“OPRD”) properties including the ocean shore. I am president of AUVSI Cascade, and we greatly appreciate the opportunity to comment. Please include these comments in the record of the above matter.

AUVSI Cascade consists of more than 450 members composed of professionals and companies from industry, government, and academia. AUVSI Cascade’s members include commercial drone operators, photographers, surveyors, environmental consultants, media producers, technology companies, and manufacturers operating throughout Oregon and Washington. AUVSI Cascade members contribute millions of dollars in tax revenues to the state and local economy and are similarly responsible for millions of dollars in indirect investment in Oregon and Washington. Our members and member companies are responsible for significant family wage jobs in this growing technical sector.

Respectfully, AUVSI Cascade objects to the proposed rules as harmful to those important interests. As explained in the conclusion to this letter, there are reasonable alternatives and AUVSI Cascade stands ready to work constructively with OPRD to craft them.

But, as proposed, the proposed rules exceed OPRD’s statutory authority, conflict with federal law, reflect a policy choice that is inconsistent with Oregon policy choices to support the UAS industry and that unnecessarily and significantly suppresses lawful economic activity without adequate justification.

I. The Proposed Rules Improperly Regulate Where Drones May Fly, a Field Preempted by Federal Law

The proposed rules repeatedly frame UAS operations as prohibited unless affirmatively

“designated,” and condition lawful operation on specific OPRD approvals, operational limits, and discretionary closures that with all due respect go far beyond the state’s regulatory authority. In effect, the rules regulate where and when aircraft may operate in navigable airspace, imposing a preference for a default ban on flights over OPRD owned or managed lands.

However, the field of where and when aircraft may operate in the navigable airspace is a field that is exclusively governed by federal law. Congress has vested the Federal Aviation Administration (FAA) with sole authority over the national airspace system, including the operation of unmanned aircraft. States and land managers may regulate ground operations, but they may not impose de facto flight restrictions by imposing a default “no operations” rule, conditioning aircraft operations on discretionary location approvals, time-of-day limits, seasonal closures, or undefined “management objectives.”

Although the proposed rules recite that operators must comply with FAA regulations, it is respectfully submitted that that disclaimer does not cure the underlying preemption problem. A state agency may not do indirectly—through “operation areas,” passes, and permit conditions—what it is barred from doing directly.

AUVSI Cascade recognizes that it has long been recognized that state and local governments may regulate where aircraft take off and land and that States have a valid interest in choosing where aircraft may operate while on the ground. No one disputes that laws designating takeoff and landing locations have no direct effect on where UAS may operate in the air. But the proposed rules reach into operations in the navigable airspace and as such are preempted.

II. The Proposed Rules Start from the Incorrect and Harmful Premise That UAS Are Presumptively Prohibited on the Ocean Shore and Park Lands

The structure of the proposed rules assumes that UAS operations are inherently incompatible with Oregon’s ocean shore and park system and, therefore, must be treated as an exception rather than a lawful recreational and commercial use.

AUVSI Cascade respectfully submits that premise is unsound policy.

Drones are widely used for tourism promotion, environmental monitoring, coastal erosion documentation, search-and-rescue support, mapping, and media production, all of which directly benefit the public and the State. Treating UAS activity as presumptively prohibited—subject only to narrow, discretionary and revocable carve-outs—unreasonably stifles innovation, small business activity, and economic development along the coast and in urban and rural communities.

Nothing in Oregon law declares that drones are incompatible with the ocean shore. To the contrary, the ocean shore has long been managed as a multiple-use public resource, and modern, low-impact aviation technology should not be singled out for disfavored treatment absent clear legislative direction. Similarly, nothing in Oregon law declares that drone flights are incompatible with state parks. They are often managed for multiple uses. A reasonable balance can and should be struck, that thoughtfully limits take off and landing sites to avoid specific problems but that does not reach into lawful FAA governed airspace operations or otherwise unreasonably limit the technology.

III. The Proposed Rules Exceed OPRD’s Statutory Authority Under SB 109

The source of authority for the proposed rules is SB 109. As the notice for the proposed

rulemaking recognizes “Senate Bill 109 (2021) directed OPRD to adopt rules governing drone takeoff and landing on state park property and the ocean shore.” The statutory text does not grant authority to regulate UAS operations in navigable airspace, including where drones may fly once airborne. However, the proposed rules do far more than “gover[n] drone takeoff and landing on state park property and the ocean shore”:

They:

- Condition flight in designated “UAS Operation Areas” that are not published on navigation maps but only on OPRD’s website and that may be modified or rescinded at any time;
- Imposes discretionary time-of-day, seasonal, and capacity-based limits untethered to takeoff or landing impacts;
- Require discretionary “UAS Passes” even where no physical impact to park property occurs;
- Effectively prohibit overflight of vast areas in Oregon traditionally used by UAS operators; and
- Authorizes enforcement and penalties for lawful flight operations occurring primarily in airspace, not on the ground.

It is respectfully submitted that the proposal is not a takeoff-and-landing rule. Rather, it is a comprehensive aircraft operations regime, and OPRD simply does not have statutory authority to create such a regime.

IV. The Allowance and Permit Framework Is Vague, Burdensome, and Invites Arbitrary Enforcement

Even if OPRD had authority to regulate as broadly as proposed (it is respectfully submitted that it does not), the rules fail basic standards of clarity and administrability.

Key terms—such as “user conflict,” “operational capacity,” and “management objectives”—are undefined and wholly discretionary. UAS Operation Areas may be created, modified, or rescinded with minimal notice, leaving operators unable to plan lawful activities with any certainty.

The pass and permit structure is also unnecessarily complex and duplicative, particularly for small businesses that already comply with FAA certification, insurance, and operational requirements. The rules offer no objective standards for approval, no timelines for agency action, and no meaningful constraints on discretionary denials.

This lack of clarity creates a strong risk of chilling lawful activity, deterring investment, and as well as exposing OPRD to claims of arbitrary and inconsistent enforcement.

V. The Proposed Rules Overstate Impacts While Minimizing Economic Harm

The fiscal and economic impact statement asserts that compliance costs will be “minimal.” It is respectfully submitted that assertion is unsupported.

For many small businesses, the inability to reliably access coastal and park navigable airspace locations for lawful aerial photography, surveying, or documentation is not a minor inconvenience—it is a business-ending restriction. The rules also undervalue the economic contribution of drone-enabled tourism marketing, media production, and environmental services that directly support local communities.

OPRD was expressly asked to consider alternatives that would reduce negative economic impacts. The current proposal does not meaningfully do so.

VI. First Responders

The proposed rules carve out an exception allowing for “public safety agencies and other governmental entities” to use uncrewed systems “during emergencies” without prior OPRD approval. Respectfully, that authorization is too narrow. The term “emergency” is undefined in

the proposed rules, leaving a critical ambiguity that could cost lives. Moreover, as Fire Chief Jeff Pricher testified at the January 20, 2026 hearing, while an “emergency” (depending on how the term is defined), may be over, the required public safety work is not.

In real incidents, the immediate life-safety phase may wrap up quickly, but the highest-risk work often continues for days or weeks: damage assessment, hazard identification, stabilization, recovery operations, and ongoing protection of people and responders. Uncrewed systems are invaluable in that post-acute window because they reduce responder exposure, expand situational awareness, and speed decisions without putting a person into unstable terrain or structures. Examples: after a wildfire, drones are used well beyond the “emergency” to map burn severity, locate hot spots, identify snags and unstable slopes, and guide containment repair and re-entry decisions; after a flood or storm surge, they’re used to document washouts, inspect levees and bridges, locate debris jams, and spot downed lines and contaminated discharges; after an earthquake or major wind event, they’re used to inspect compromised buildings, chimneys, and rooflines before sending in inspectors; after a landslide, they’re used to monitor continued movement and identify secondary failures; after a hazardous materials spill, they’re used to monitor plumes and runoff pathways and to check containment integrity; and after a search-and-rescue “emergency” is declared over, they’re still used for follow-up grid searches, terrain documentation, and route planning for recovery teams.

If the proposed rule’s purpose is truly public safety, it should be written to cover the full incident lifecycle—response, stabilization, recovery, and post-incident hazard mitigation—not just the narrow moment when someone labels the situation an “emergency.”

VII. Response to Claims at OPRD’s Hearing

At OPRD’s January 20, 2026 hearing on the proposed rules, some speakers supported the proposed rules and asked for even more draconian regulation of uncrewed systems, claiming nesting or other vague bird and wildlife impacts. Respectfully, those assertions go too far and do not justify either the proposed rules or a more restrictive version of them.

A blanket prohibition on commercial or recreational drone operations over the ocean shore or other OPRD owned or managed land, based solely on the fact that birds nest there is not a tailored, evidence-based response and would unnecessarily foreclose a lawful use that can be managed with reasonable time, place, and manner limits. Drone activity is not a meaningful proxy for risk: a drone’s acoustic footprint and flight behavior are driven by FAA rules concerning altitude and operator practices and the aircraft used for the particular mission. Especially on an exposed shoreline, it is not reasonable to presume that a small UAS is categorically louder than ambient conditions like surf and wind, or categorically more disruptive than the many other uses the public is already allowed to engage in on the ocean shore (often at closer range and with more sustained presence).

If OPRD has a real, evidence-based concern about disturbance to nesting birds on the ocean shore or elsewhere, it should address that concern in a way that is both narrowly targeted and legally durable—which means avoiding state rules that function as “rules of flight” in navigable airspace (e.g., state-imposed minimum altitudes, flight-path restrictions, or airspace exclusion zones), because those are the types of operational airspace controls that are federally preempted. Instead, the state should regulate where it has lawful footing: seasonal, site-specific ground-based management tied to documented colonies—temporary closures or setbacks on state-managed beach access points and dunes; conditions on launch/landing/recovery from state property during nesting season; and neutral, enforceable prohibitions on harassing,

flushing, or disturbing protected wildlife that apply to any activity (drones, kites, pets, people), backed by monitoring and clear enforcement triggers. This approach avoids an assumption-driven, categorical “drones off-limits” rule, while still protecting nesting habitat through evidence-based time/place controls that do not attempt to commandeer the FAA’s role in regulating navigable airspace.

VIII. A Lawful and Balanced Alternative Exists

If OPRD wishes to proceed, a lawful approach is available:

Limit regulation strictly to physical takeoff and landing locations;

Treat UAS activity as a lawful use by default, subject to narrowly tailored, site-specific ground restrictions where demonstrably necessary;

Use objective, clearly defined standards; and

Coordinate with, rather than duplicate or conflict with, FAA oversight.

It is respectfully submitted that anything broader exceeds OPRD’s authority, chills this important and nascent industry and invites challenge.

IX. Conclusion

Respectfully, as proposed, the rules lack lawful foundation, are economically harmful, are based on a fundamentally incorrect premise about drones and public lands, as well as reflect a misunderstanding of federal supremacy in regulating flight the National Airspace System.

We respectfully urge OPRD to withdraw the proposed rules and re-engage with stakeholders to develop a framework that is consistent with federal law, legislative intent, and Oregon’s commitment to innovation and economic opportunity.

Thank you for the opportunity to comment. We are disappointed that OPRD did not include AUVSI in the development of the proposed rules. As the largest trade association in the world concerning these aircraft, and AUVSI Cascade serving as a knowledge repository for the Pacific Northwest, we welcome the opportunity to participate in further discussions concerning the proposed rules and any other rulemakings or advisory capacity if concerns arise in the future.

Very truly yours,
Wendie L Kellington
President, AUVSI Cascade



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Roger Williams

Date comment received:

February 4, 2026 01:38 AM

Commenter email (if provided):

rogermwilliams@msn.com

Location (if provided): {city}, {state}

Public comment:

When I go to state parks, or outdoors in general, there is already so much sound pollution, overcrowding, general pollution and other issues that need to be addressed also. The use of drones would be another loss of what nature is about. The animals, the sounds of the trees and wind, and the protection of wildlife. I agree that drones could very well be misused and create more problems. It's difficult for rangers to keep track of illegal uses of park land and stopping the use of drones would help them deal with other issues.

So, yes, I think the use of drones on public land should not be allowed, except in research, and even then, it should be short term.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Gwen Starrett

Date comment received:

February 4, 2026 05:46 PM

Commenter email (if provided):

gstarrett@volcano.net

Location (if provided): {city}, {state}

Public comment:

Commissioners,

I appreciate your consideration of regulating drone usage in State Parks and along the Oregon coast. I am an active birdwatcher and have participated in community science projects monitoring Western Snowy Plovers, Black Oystercatchers, and nesting seabirds. I know personally how human activity can compromise the nesting success of these birds. Our coastline also supports migrating shorebirds that rest or feed along their impressive annual journeys.

I commend the proposed rules specifically prohibiting drone use in Snowy Plover management areas. But, of course, these birds sometimes nest outside those areas. And can we expect them to make a healthy recovery if we do not make nesting more advantageous outside these small management areas? Black Oystercatcher's rocky habitat is very limited and valuable real estate for these beauties. Prohibiting drone use in all Rocky Habitat Management Areas, Marine Reserves, and Marine Protected Areas would reduce additional disturbance to them.

I am lucky to live here in Netarts, with state parks and USFWS refuges close to home. The seabird monitoring I conducted was at Cape Meares and the abandonment of entire breeding colonies of cormorants routinely happens due to Bald Eagle strafing. I can imagine the same abandonment would happen with one unknowing drone user wanting to get a closer look at these colonies. Please consider also including a 0.5 mile buffer in OPRD managed land adjacent to all USFWS refuges.

Thank you so much for your work in service to wildlife and the management of our state parks.

Sincerely,

Gwen Starrett

Netarts OR



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Kim

Date comment received:

February 4, 2026 05:46 PM

Commenter email (if provided):

kim@beelermarketing.com

Location (if provided): {city}, {state}

Public comment:

- Drones disturb birds and wildlife because they are perceived to be predators and have been shown to cause significant impacts to nesting birds. With this in mind, we urge OPRD to take a precautionary approach to where and when it allows drone use.
- Millions of Oregonians and out-of-state visitors enjoy Oregon's amazing state parks. **Only a small fraction of these users operate drones yet their noise and intrusion affect wildlife and scenic habitats.** The vast majority of visitors come to parks to enjoy beautiful landscapes, wildlife and quiet time away from the hustle and bustle of everyday life. **OPRD should recognize this aspect of visitor use and only allow drone use in a small number of limited areas** that are not visited by people seeking natural qualities of the parks and that are not used by sensitive birds and other wildlife.
- Oregon's newly updated [State Wildlife Action Plan](#) includes over 70 at-risk species of birds and mammals, many of which are known to be negatively impacted by drones. This includes birds like the Black Oystercatcher, Brown Pelican, Caspian Tern, Peregrine Falcon and mammals including the Harbor Seal and Steller's Sea Lion.
- We appreciate State Parks draft rules specifically prohibit drone use in Snowy Plover management areas. **The rules should prohibit drone use in all Rocky Habitat Management Areas, Marine Reserves and Marine Protected Areas as well.**
- **We recommend OPRD adopt no take off and landing rules in a 0.5mi buffer in OPRD managed land adjacent to all U.S. Fish and Wildlife Service refuge and other federally lands** designated to protect wildlife populations and habitats.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Anne Tracy Winn

Date comment received:

February 4, 2026 06:48 PM

Commenter email (if provided):

atracywinn@gmail.com

Location (if provided): {city}, {state}

Public comment:

- I strongly and wholeheartedly urge you to restrict drone use in our state parks. Drones are extremely disruptive to people and wildlife while providing entertainment to only a few. So much would be lost in terms of the peacefulness, respite, and beauty that our parks provide if the intrusiveness of drones is allowed, and that's just the cost to human beings. Even more important is the wildlife that increasingly has fewer and fewer places that aren't negatively impacted by human activities. Let's not add another detrimental activity to the already long list.
- **OPRD should only allow drone use in a small number of limited areas.**
- Oregon's newly updated **State Wildlife Action Plan** includes over 70 at-risk species of birds and mammals, many of which are known to be negatively impacted by drones. This includes birds like the Black Oystercatcher, Brown Pelican, Caspian Tern, Peregrine Falcon and mammals including the Harbor Seal and Steller's Sea Lion.

Thanks for your consideration. Please severely restrict drone use for the greater good!!!

Sincerely,
Anne Tracy Winn



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Danielle Tinker

Date comment received:

February 4, 2026 06:49 PM

Commenter email (if provided):

tinker.danielle@gmail.com

Location (if provided): {city}, {state}

Public comment:

First, let me say that I really appreciate that OPRD is moving forward with rules to regulate drone use in state parks and along the ocean shore, and I'm proud of Oregon for taking this growing issue seriously.

I'm an Oregonian born and raised, and wildlife is a big part of what makes this state special to me. From watching birds along the coast to seeing marine mammals in the wild, these experiences matter.

Oregon's State Wildlife Action Plan identifies more than 70 at-risk bird and mammal species, many of which are known to be negatively impacted by drones. That's why I'm concerned about the growing impacts of drone use on nesting birds, marine mammals, and other wildlife.

Most people don't visit state parks to fly drones. They come to enjoy the scenery, see wildlife, and have some peace and quiet. Only a small number of visitors use drones, but their noise and presence can have a big impact on both wildlife and the park experience. **I encourage OPRD to take a careful, common-sense approach that puts wildlife and people first.**

Specifically, I ask that OPRD:

- Keep drone use prohibited in Snowy Plover management areas
- Expand drone restrictions to Rocky Habitat Management Areas, Marine Reserves, and Marine Protected Areas
- Limit drone use to a small number of clearly marked areas that avoid sensitive wildlife and popular natural spaces
- Create a no takeoff and landing buffer of 0.5 miles near wildlife refuges and other protected lands
- Have a clear plan for rolling out and enforcing these rules so they actually work

Thank you for listening and for your continued work to protect Oregon's wildlife and state parks.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Emily Reinig

Date comment received:

February 4, 2026 08:23 PM

Commenter email (if provided):

emileeereinig@gmail.com

Location (if provided): {city}, {state}

Public comment:

Dear OPRD,

It's my view that drone take-offs and landings should be banned in state parks except for official park needs. Many other states and the National Park Service have banned drones from their parklands. Our parks are just as valuable and should be treated with just as much respect.

Most people go to parks to enjoy the beauty and wonder of the natural world, which includes the sounds of birds and wildlife. Only a tiny portion of people visiting parks operate drones, yet their noise and intrusion affect many people, and also birds.

Restricting drones is especially important on the coast where they have been directly observed to disrupt Black Oystercatchers and Osprey. Wildlife should not take a back seat to drone operators in our parks.

OPRD should focus its limited financial resources and staff on work that aligns with the agency's core mission goals and not on expanding a use program for interest groups representing a tiny portion of park users.

If drones are permitted at all, it should be only in tightly limited areas, and in only a small, selection of parks that are not visited by people seeking natural qualities and that are not used by birds and other wildlife.

Thank you for considering my view.

Sincerely,



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Aubree Bernier-Clarke

Date comment received:

February 4, 2026 08:52 PM

Commenter email (if provided):

djsnowtiger@gmail.com

Location (if provided): {city}, {state}

Public comment:

Hello,

I appreciate, with the adoption of new rules, State Park managers will now have tools to actually regulate drone use in state parks. Drones disturb birds and wildlife because they are perceived to be predators and have been shown to cause significant impacts to nesting birds. With this in mind, I urge OPRD to take a precautionary approach to where and when it allows drone use.

Millions of Oregonians and out-of-state visitors enjoy Oregon's amazing state parks. Only a small fraction of these users operate drones yet their noise and intrusion affect wildlife and scenic habitats. The vast majority of visitors come to parks to enjoy beautiful landscapes, wildlife and quiet time away from the hustle and bustle of everyday life. OPRD should recognize this aspect of visitor use and only allow drone use in a small number of limited areas that are not visited by people seeking natural qualities of the parks and that are not used by sensitive birds and other wildlife.

Oregon's newly updated [State Wildlife Action Plan](#) includes over 70 at-risk species of birds and mammals, many of which are known to be negatively impacted by drones. This includes birds like the Black Oystercatcher, Brown Pelican, Caspian Tern, Peregrine Falcon and mammals including the Harbor Seal and Steller's Sea Lion.

I appreciate State Parks draft rules specifically prohibit drone use in Snowy Plover management areas. The rules should prohibit drone use in all Rocky Habitat Management Areas, Marine Reserves and Marine Protected Areas as well. I recommend OPRD adopt no take off and landing rules in a 0.5mi buffer in OPRD managed land adjacent to all U.S. Fish and Wildlife Service refuge and other federally lands designated to protect wildlife populations and habitats.

Thank you.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Charlie Stephens

Date comment received:

February 5, 2026 06:32 PM

Commenter email (if provided):

charliejstephens@gmail.com

Location (if provided): {city}, {state}

Public comment:

I am writing to express my strong opinion against the use of drones in our state parks. Drones disrupt the quiet and solitude that many of us go out into nature for in the first place, and even worse, they disturb Oregon's wildlife, making their habitats stressful and unsafe.

Thanks for your consideration,

Charlie Stephens



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Lisa Mangum

Date comment received:

February 5, 2026 06:52 PM

Commenter email (if provided):

manguml@eou.edu

Location (if provided): {city}, {state}

Public comment:

Hello,

While I can appreciate that many people lack access to wide open spaces in which to fly their drones, the Audubon Society's study on bird populations has shown that they have declined precipitously. Habitat loss, toxic impacts, and invasive species have served to reduce their numbers with alarming efficiency. Our parks are meant to provide access to nature and respite for species that have no place else to feed and nest. Please do not allow the well being of so many others - human and animal alike - to be impacted by yet another encroachment of technology. We are filmed, scanned, and logged everywhere we go now. Please keep some places wild and quiet.

My thanks for your consideration,

Lisa M. L. Mangum



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Erika Bauer Marshburn

Date comment received:

February 5, 2026 06:53 PM

Commenter email (if provided):

ebmarshburn@gmail.com

Location (if provided): {city}, {state}

Public comment:

I urge you to regulate drone use in state parks, and also in nature areas where wildlife would be affected. I'm thinking of Haystack rock in Cannon Beach, where puffins and other birds are affected. Drones disturb birds and wildlife, causing them harm. I urge OPRD to take a precautionary approach to where and when it allows drone use.

Thank you!

Erika Bauer Marshburn



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Damian Fagan

Date comment received:

February 5, 2026 06:54 PM

Commenter email (if provided):

dfagan746@gmail.com

Location (if provided): {city}, {state}

Public comment:

I am writing in regards to the review of UAS aircraft in Oregon's State Parks. While I can appreciate the visual bird's eye view from a UAS, I believe that these aircraft should be highly restricted in most state parks and heavily regulated where they are allowed.

UAS are an invasion of privacy to me, especially when I'm out enjoying the solitude or natural qualities of an Oregon State Park. I do not like the annoying buzz of these drones hovering nearby and certainly do not condone them filming wildlife in sensitive situations just to "get a picture." I feel that if these aircraft are not highly regulated, the potential conflicts between UAS users and park visitors will increase, as well as impacts to wildlife.

I find that most drone operators have little care for how others view this invasion of privacy. They do not understand that aerial filming can have impacts to the privacy rights of individuals and that hearing or seeing a drone in a state park is not a positive image.

I urge you to heavily restrict and prohibit UAS aircraft in Oregon State Parks.

Thank you for your time in regards to this review.

All the best,
Damian Fagan
Bend, OR



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Jerry Molnar

Date comment received:

February 5, 2026 09:20 PM

Commenter email (if provided):

airman749@aol.com

Location (if provided): {city}, {state}

Public comment:

I am writing as a longtime recreational RC soaring enthusiast and frequent visitor to Cape Blanco State Park to submit public comment on the proposed rules for take-off and landing of unmanned aircraft systems (UAS) in Oregon State Parks and on the Ocean Shore.

I fully support OPRD's efforts to protect park resources, wildlife (especially nesting seabirds), visitor experience, and quiet enjoyment by regulating noisy, intrusive motorized drones (e.g., multi-rotor quadcopters that produce high-RPM buzzing and can harass people/animals). These concerns are valid and well-documented.

However, the current draft language risks unintentionally prohibiting low-impact, silent activities like traditional model gliding/slope soaring, which have occurred safely and responsibly at sites like Cape Blanco for decades. Unpowered (or lightly powered) RC gliders/sailplanes:

- Produce no motor noise (silent flight except for minor air rush).**
- Operate at low frequencies (often 1-5 pilots at a time, not swarms).**
- Stay within visual line-of-sight, low altitudes, and established bluff areas away from trails/wildlife nesting zones.**
- Have minimal environmental footprint—no prop wash, no batteries littering beaches.**

Banning these would eliminate a low-key, educational outdoor hobby

that draws respectful visitors to remote parks like Cape Blanco without causing the disturbances associated with motorized UAS.

Simple fix: Insert “motorized” before “unmanned aircraft systems” (or “drones”) in the rule definition/exclusions, or add an explicit exemption for unpowered/silent model gliders and sailplanes. This mirrors FAA distinctions and addresses the intent (noise/privacy/wildlife protection) without overreach.

I urge OPRD to adopt this clarification so responsible glider pilots can continue enjoying Cape Blanco’s world-class slope soaring while OPRD effectively manages true drone concerns.

Thank you for considering this input and for your work balancing recreation and preservation. I am available for any questions.

Sincerely,

Jerry Molnar (long time Cape Blanco visitor and RC slope flying pilot)



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Serafine Lilien

Date comment received:

February 5, 2026 09:22 PM

Commenter email (if provided):

youaregolden@gmail.com

Location (if provided): {city}, {state}

Public comment:

- Dear Members,
-
- State Park managers will now have tools to actually regulate drone use in state parks.
- Drones disturb birds and wildlife because they are perceived to be predators and have been shown to cause significant impacts to nesting birds. With this in mind, we urge OPRD to take a precautionary approach to where and when it allows drone use.
- Millions of Oregonians and out-of-state visitors enjoy Oregon's amazing state parks. **Only a small fraction of these users operate drones yet their noise and intrusion affect wildlife and scenic habitats.** The vast majority of visitors come to parks to enjoy beautiful landscapes, wildlife and quiet time away from the hustle and bustle of everyday life. **OPRD should recognize this aspect of visitor use and only allow drone use in a small number of limited areas** that are not visited by people seeking natural qualities of the parks and that are not used by sensitive birds and other wildlife.

Oregon's newly updated **State Wildlife Action Plan** includes over 70 at-risk species of birds and mammals, many of which are known to be negatively impacted by drones. This includes birds like the Black Oystercatcher, Brown Pelican, Caspian Tern, Peregrine Falcon and mammals including the Harbor Seal and Steller's Sea Lion.

- We appreciate State Parks draft rules specifically prohibit drone use in Snowy Plover management areas. **The rules should prohibit drone use in all Rocky Habitat Management Areas, Marine Reserves and Marine Protected Areas as well.**
- **We recommend OPRD adopt no take off and landing rules in a 0.5mi buffer in OPRD managed land adjacent to all U.S. Fish and Wildlife Service refuge and other federally lands** designated to protect wildlife populations and habitats.

Thanks,
Serafine Lilien
Milwaukie, OR 97222



Submit a public comment on a rule

Oregon Parks and Recreation Department

Date comment received:

February 6, 2026 06:38 AM

Commenter email (if provided):

lbhikes@msn.com

Location (if provided): {city}, {state}



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Lisa Brice

Date comment received:

February 6, 2026 06:46 AM

Commenter email (if provided):

lbhikes@msn.com

Location (if provided): {city}, {state}

Public comment:

Drone use on beaches interrupts wildlife resting & feeding. They should not be allowed.
Making birds repeatedly fly risk their life.
Please do not allow drones on beaches & State Parks.
Thank you



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Lloyd Vivola

Date comment received:

February 6, 2026 04:29 PM

Commenter email (if provided):

nouveladam@hotmail.com

Location (if provided): {city}, {state}

Public comment:

Dear OPRD:

Ideally, I oppose drone use on all state lands including state parks except when use has been licensed for educational, artistic or scientific reasons and only for a prescribed duration.

However, I am encouraged to see that OPRD convened a work group to reach a consensus on drone regulation, and that this work group included Bird Alliance of Oregon.

I am also encouraged that OPRD is now receiving public comments regarding this issue.

In general, I support regulations that give the utmost consideration to the well-being of marine, avian and terrestrial wildlife in ways consistent with the latest scientific data and mapping guidance.

I also support regulations that give utmost consideration to non-users of drones, not least of all those who enjoy interaction with Oregon's many natural settings, assets and amenities.

Accordingly, I concur with specific concerns as stated by Bird Alliance of Oregon:

1) Only a small fraction of state park users operates drones, yet the impact of their noise and intrusion on wildlife habitats and scenic venues is grossly disproportionate. OPRD should recognize this aspect of visitor use and only allow drone use in a small number of limited areas.

2) Rules should prohibit drone use in all Rocky Habitat Management Areas, Marine Reserves and Marine Protected Areas.

3) It would be wise and ecologically proactive to adopt no take off and landing rules in a half-mile wide buffer zone on all lands managed by OPRD that are adjacent to federal agency lands designated to protect wildlife populations and habitats.

In ending, I suggest that OPRD develop an educational program to promote ecologically sound and responsible drone use, as well as a means for encouraging recreational drone use at private venues.



Submit a public comment on a rule

Oregon Parks and Recreation Department

Commenter name (if provided):

Susan Nolte

Date comment received:

February 6, 2026 04:30 PM

Commenter email (if provided):

s.nolte@frontier.com

Location (if provided): {city}, {state}

Public comment:

To Whom It May Concern:

Every week I visit an Oregon State Park, sometimes more than once a week. Th last thing I want to see or hear is a drone and I don't want the wildlife that I regularly come to enjoy to be be bothered or negatively impacted by a drone. I see very little reason for private parties to even recreationally be using a drone. They are intrusive and annoying.

I appreciate, with the adoption of new rules, State Park managers will now have tools to actually regulate drone use in state parks and these rules should be clearcut. Limit drone use as much as possible!!

Drones disturb birds and wildlife because they are perceived to be predators and have been shown to cause significant impacts to nesting birds. With this in mind, I urge OPRD to take a precautionary approach to where and when it allows drone use. The vast majority of visitors, like myself, come to parks to enjoy beautiful landscapes, wildlife and quiet time away from the hustle and bustle of everyday life. **OPRD**

should recognize this aspect of visitor use and only allow drone use in a small number of limited areas that are not visited by people seeking natural qualities of the parks and that are not used by sensitive birds and other wildlife.

Oregon's newly updated [State Wildlife Action Plan](#) includes over 70 at-risk species of birds and mammals, many of which are known to be negatively impacted by drones. This includes birds like the Black Oystercatcher, Brown Pelican, Caspian Tern, Peregrine Falcon and mammals including the Harbor Seal and Steller's Sea Lion.

I appreciate State Parks draft rules specifically prohibit drone use in Snowy Plover management areas, but this is not enough. The rules SHOULD prohibit drone use in **all** Rocky Habitat Management Areas, Marine Reserves and Marine Protected Areas as well.

I agree with the recommendation that OPRD adopt no take off and landing rules in a 0.5mi buffer in OPRD managed land adjacent to all U.S. Fish and Wildlife Service refuge and other federally lands designated to protect wildlife populations and habitats.

Thank you for your consideration,
Susan Nolte