



# Submit a public comment on a rule

**Oregon Parks and Recreation Department**

**Commenter name (if provided):**

George Benes

**Date comment received:**

February 13, 2026 12:46 PM

**Commenter email (if provided):**

georgebenes8@gmail.com

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

**Public comment:**

Responsible drone operators are a great asset to Oregon's economy and exposure



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Minott Kerr

**Date comment received:**

February 13, 2026 04:19 PM

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

**Public comment:**

I call for you, OPRD, to strengthen the rules regulating drone take-offs and landings within State Parks as well as along the ocean shore and to include a strong roll out plan in order to help best protect nesting birds, marine mammals, and other wildlife from drone disturbances.

Drones disturb birds and wildlife because birds and other wildlife perceive drones to be predators and have been shown to cause significant impacts to nesting birds. A growing body of science indicates improper drone use has increasingly caused wildlife disturbances, leading to nest failures and other impacts contributing to wildlife population declines.

Drones with their noise and intrusion not only affect wildlife but also the enjoyment by non-drone using visitors in scenic habitats. OPRD must limit drones to a small number of limited areas that are not visited by people seeking natural qualities of the parks and most importantly that are not used by birds and other wildlife sensitive to drone intrusions.

The new regulations will give State Park managers tools to actually regulate drone use in state parks.

However while the State Parks draft rules specifically prohibit drone use in Snowy Plover management areas, the rules must additionally prohibit drone use in all Rocky Habitat Management Areas, Marine Reserves and Marine Protected Areas as well.

Finally OPRD must 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 in order to ensure that drones do not adversely affect these sensitive areas.

Thank you for allowing concerned Oregonians to comment on the proposed regulations. I hope you will take these suggestions to heart in order to best protect birds and other wildlife from the serious harm that drones can do and to ensure that the protected areas can best be experienced and enjoyed without the disruptions that drones can cause.

Minott Kerr

NW Portland 97209



# Submit a public comment on a rule

**Oregon Parks and Recreation Department**

**Commenter name (if provided):**

Deb Brewer

**Date comment received:**

February 13, 2026 04:19 PM

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

**Public comment:**

Drones are incredibly harmful to wildlife and serve no useful purpose for anyone. Please ban drones in all parks.



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Kim Meacham

**Date comment received:**

February 13, 2026 04:20 PM

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

**Public comment:**

NO, we do not want unmanned airships, drones, or other comparable devices overflying Oregon Parks.

If people want to fly their own, personal devices, they should do so over their very own property. They should use their own personal property and NOT over publicly held properties.

These devices both produce unpleasant buzzing sound let alone act as an unacceptable invasion of personal privacy.

Public places are for public enjoyment - not an imposition of personal desires to fly personal property. There is no place for private aircraft over public parks.



# Submit a public comment on a rule

**Oregon Parks and Recreation Department**

**Date comment received:**

February 13, 2026 04:55 PM

**Commenter email (if provided):**

president@deschuteswild.org

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

**Public comment:**

Deschutes Wild's members and supporters work to protect wildlife and habitat in the Upper Deschutes watershed, including La Pine State Park. Drones are not compatible with our human experience and harm birds and other wildlife. Please ban drones from state parks.



# Submit a public comment on a rule

**Oregon Parks and Recreation Department**

**Commenter name (if provided):**

Douglas Kaehler

**Date comment received:**

February 13, 2026 08:54 PM

**Commenter email (if provided):**

douglas.kaehler@gmail.com

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

**Public comment:**

To Whom It May Concern,

I do not believe that drones should be allowed in public spaces. They disturb the sanctity and privacy. I also do not think that drones should be used for commercial delivery vehicles. This would encroach on the private sphere.

Sincerely,

Douglas Kaehler



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Linda Edwards

**Date comment received:**

February 13, 2026 08:56 PM

**Commenter email (if provided):**

lae1943@icloud.com

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

**Public comment:**

Dear ORPD,

I strongly urge you to ban all drone activity in Oregon State Parks except for official park needs. I love our state parks because they are a refuge from machines and noise. I want to immerse myself in the sights and sounds and quiet of Nature. Drone noise and activity are upsetting and disrupting to wildlife and people. If need be, create a special park just for drones and their fans. Keep them out of our peaceful state parks.

Thank you,  
Linda Edwards  
Gold Beach OR



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Sylvia McFarland

**Date comment received:**

February 13, 2026 08:58 PM

**Commenter email (if provided):**

sylviac.mcfarland@gmail.com

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

**Public comment:**

I go to public parks for the nature (plants, trees, and animals), and to get away from technology.

Drones would have a negative impact on animals and my enjoyment of the park and coast. If there are drones in the air, I worry about the competency of the pilot, and therefore, my safety and that of the animals and birds. I therefore would not be able to enjoy the beauty of the natural environment around me.

Please, do not allow drone use in public parks nor the coast.

Sincerely,  
Sylvia McFarland



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Nanette Seto

**Date comment received:**

February 13, 2026 09:10 PM

**Commenter email (if provided):**

nanette\_seto@fws.gov

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

**Public comment:**

RE: Comments on the creation and proposed changes to rules surrounding take-off and landing of Unmanned Aircraft Systems/Drones within a state park and along the ocean shore

The U.S. Fish and Wildlife Service (Service), Migratory Birds and Habitat Program, appreciates the opportunity to review and comment on the Oregon Parks and Recreation Department's (OPRD) proposed revisions to the Oregon Administrative Rules governing the takeoff and landing of Unmanned Aircraft Systems (UAS; drones) within Oregon State Parks and along the ocean shore.

The Service supports the proposed rule revisions and acknowledges OPRD's efforts to strengthen resource protection through clearer designations and improved management authority.

We offer the following comments and recommendations in support of the rule as drafted:

**Support for Proposed Rule Elements:**

**1. Definition of UAS Operation Area**

We support the inclusion of an official UAS Operation Area zone map published on OPRD's website. It is recommended that, upon implementation, OPRD integrate habitats of sensitive migratory birds (including breeding, roosting, and foraging areas) into the designated zones, especially in regions where these habitats coincide with the proposed UAS takeoff and landing zones.

**2. Compliance with Federal Wildlife Protection Laws**

We support the requirement that UAS operators comply with applicable federal laws and regulations, including prohibitions on wildlife harassment under OAR 736-010-0055.

Given the increasing levels of disturbance to coastal wildlife resulting from UAS use, this clarification is essential for protection of migratory birds and other sensitive wildlife.

### 3. Authority to Adjust Permits Based on Resource Protection Needs

We support OPRD's ability to add, modify, suspend, or rescind permits based on resource protection considerations and seasonal conditions. We specifically recommend seasonal or permanent closures of take-off and landing of drones on Oregon State Park lands to protect sensitive species, including Black Oystercatcher, Tufted Puffins, other seabird breeding colonies, and Western Snowy Plover, during critical nesting and breeding periods. Where federal lands prohibit the use of drones, we recommend permanent closures to take-off and landing of drones on all state lands within a half mile radius of federal ownership.

### 4. Restrictions in Western Snowy Plover Management Areas

We strongly support the provision that restrictions in Western Snowy Plover Management Areas, as described in OAR 736-021-0090(15), apply to UAS operations (take offs and landing). This measure is an important and necessary tool to minimize disturbance to this listed species and support ongoing conservation and recovery efforts.

The Service recognizes and respects OPRD's proactive approach to balancing recreational access

with the protection of coastal wildlife and habitats. We look forward to continued collaboration to ensure that Oregon's coastal and park resources are managed in a manner that supports both

public enjoyment and long-term conservation of wildlife and their habitats.

Migratory birds are protected from "take" under the Migratory Bird Treaty Act (MBTA). Under the MBTA, take includes unintentional actions that result in the injury or death of protected birds, including adults, chicks, and eggs. Accordingly, proactive measures to avoid disturbance are an important component of protecting coastal bird populations and maintaining compliance with federal law.

Recreational drone use has increased throughout Oregon, including, notably, along Oregon's spectacular coastline. In addition to being a valued recreational resource, the Oregon Coast's beaches, rocks, cliffs and islands are essential nesting and staging habitat for shorebirds and seabirds including tufted puffin, common murre, pigeon guillemot, black oystercatcher, western

snowy plover and many migrating shorebirds. Approximately 1.3 million seabirds representing 15 species nests at nearly 400 colonies in Oregon (Naughton et al. 2007). As drone use has increased, so too has disturbance to birds by drones. Nesting birds can perceive a drone flying over them as an aerial predator that poses a fatal threat to their eggs or chicks. Certain species are

especially prone to drone disturbance during critical times in their nesting cycle or during migration. The increase in drone use and outdoor recreation in Oregon results in cumulative disturbance to birds and wildlife, but drones are a unique disturbance type. By their nature, drones can harass birds in unique ways, particularly when they enter otherwise undisturbed locations inaccessible to bicycles, dogs, and people. All combined, disturbances in popular recreation areas such as the Oregon coast may continue from dawn to dusk, causing continual stress for birds and wildlife during critical times that can significantly affect reproduction and survival

Black oystercatchers, for example, inhabit rocky coastlines and gravel and sandy beaches year-round. Their nests are hidden among rocks away from predators and above the high tide line. By nature, they are extremely territorial against other birds and predators during the breeding

season

and become highly agitated by disturbance. Typically, they can chase off intruders and fend off predators from their nest sites. Drones, however, are perceived as predators by the birds, but do

not act like normal predators. When drones are flown for prolonged periods in the vicinity of nests, the oystercatchers are disturbed for abnormally long periods of time. This exposes unattended eggs and young to weather and predators while a parent is responding to a perceived

attack. Such disturbances have been documented repeatedly on the Oregon coast by staff of the

Oregon Islands National Wildlife Refuge, Service volunteers, citizen scientists and others. The Service and conservation partners are concerned that disturbance, by drones in particular, may lower reproductive success, and cause complete nest failure and territory abandonment of this species.

Similarly, breeding colonies of common murre, cormorants, tufted puffins, western gulls, and pigeon guillemots are sensitive to disturbance events, which may have devastating impacts to an

entire colony. Even a momentary disturbance can cause an entire colony to flush, leaving hundreds or thousands of eggs and young vulnerable to predators and the elements.

Consistent

and repeated disturbance within a nesting season can cause nest abandonment or complete colony failure. The black oystercatcher and tufted puffin are designated Birds of Conservation Concern (BCC; USFWS 2021) by the Service and an Oregon Conservation Strategy species (ODFW 2015) because of their small populations, restricted breeding distributions, and threats to

breeding birds; BCC birds receive greater attention than non-BCC species because of their conservation needs. Repeated disturbance by drones over months and years is a concern as it could cause further population decline for these Birds of Conservation Concern.

During spring and fall migration, thousands of shorebirds forage and rest along the rocky shores

and beaches managed by Oregon State Parks. These lands provide critical resources that fuel bird

migration to northern breeding grounds from late April to mid-May. Impacts to migrating birds can be significant when birds are consistently disturbed by dogs, people, vehicles, and other recreational activities (including drones). Repeated disturbances interrupt foraging routines and

do not allow migrating shorebirds to store up enough energy for their journey to the breeding grounds.

The western snowy plover is additionally listed as federally threatened and protected under the Endangered Species Act (ESA). Western snowy plovers have strict protection under the ESA, that come with regulatory requirements and penalties. Annually, several public agencies including Oregon State Parks work collaboratively to protect plovers nesting along Oregon's beaches. Disturbance by drones is an additional impact that could negatively affect their reproductive success and population recovery.

While coastal-nesting birds are of considerable concern to the Service, colony-nesting birds elsewhere in the state (e.g. along the Columbia River and on inland lakes and reservoirs, heron rookeries), nesting raptors, and other nesting birds sometimes are, or could be in the future, disturbed by unrestricted drone use. Thus, where Oregon State Parks has jurisdiction, drone use

should also be regulated as we recommend here along the coast to protect migratory birds.

To avoid impacts on birds and other wildlife of conservation concern, we recommend the following:

Implement a restriction on drone take-offs and landings near nesting areas of black oystercatchers (Liebezeit 2020), colonial nesting seabirds (Naughton et al. 2007), and western snowy plovers between March 15 and September 15 (OPRD 2025).

Adopt a ½ mile permanent drone closure on state lands that are adjacent to federal lands where

the take-off and landing of drones is prohibited (i.e. National Wildlife Refuges). For example, we recommend a permanent closure on the stretch of Cannon Beach and surrounding state waters that is within ½ mile of Haystack Rock, part of Oregon Islands National Wildlife Refuge, a critical nesting colony for tufted puffin.

Develop a map in collaboration with state, federal, and tribal wildlife management agencies of public areas closed to the take-off and landing of drones. The intent of the map is to inform recreational users on where take-off and landing of drones is permitted and where it is prohibited, even if that prohibition is seasonal. All parks and areas of the rocky shore and beaches under Oregon State Parks management should be periodically reviewed for inclusion or

removal as designated drone take-off and landing areas based on the best available science; bird

usage and other factors can change over time.

- Improve signage and consistent messaging in areas where drones are prohibited from take-off and landing. Messaging should include reference to a website for rules surrounding drone use in Oregon State Parks, etiquette and guidelines including immediately ceasing flights in an area if wildlife, including migratory birds, is disturbed.
- Implement the set of good practice guidelines developed by the Drone working group for persons obtaining a UAS pass. An individual should be denied a UAS Pass for drone take-off and landings if repeated disturbance to Migratory birds occurs under their operation.
- Clarify the proposed definitions related to violations and penalties for harassing migratory birds (“wildlife” as stated in the new rule) during landings and take-offs (i.e., what does it mean to be charged with a Class A violation). Oregon State Parks should include enforcement mechanisms in the final rule.

The USFWS Migratory Bird Program recognizes that outdoor recreation is a key public service, and that Oregon State Parks provides recreational sites for the enjoyment and education of present and future generations. We acknowledge that experiences outside are key to promoting

appreciation of nature. Healthy populations of our native birds and other wildlife are not only essential to ecosystem health but are highly valued by the public. Maintaining those healthy wildlife populations is also a shared responsibility of state, federal, and tribal partners.

We look forward to working with Oregon State Parks to address specific questions related to avian disturbance by drones, assist with documenting sensitive nesting and foraging locations, work collaboratively on educational outreach materials, and eliminate disturbances that may result in nest failure from drones.

Sincerely,

Nanette Seto  
Chief

## Migratory Birds and Habitat Program

### References:

Liebezeit, J., A. O'Connor, J.E. Lyons, C. Shannon, S. Stephensen. 2020. Black Oystercatcher (*Haematopus bachmani*) population size, use of marine reserve complexes, and spatial distribution in Oregon. *Northwestern Naturalist* 101(1): 14-26 Published By: Society for Northwestern Vertebrate Biology URL: <https://doi.org/10.1898/1051-1733-101.1.14>

Naughton, M.B., D.S. Pitkin, R.W. Lowe, K.J. So, and C.S. Strong. 2007. Catalog of Oregon seabird colonies. U.S. Department of Interior; Fish and Wildlife Service, Biological Technical Publication FWS/BTP-R1009-2007.

Oregon Parks and Recreation Department and Siuslaw National Forest. Respect Nesting Areas to

Protect Threatened Snowy Plover, March 15–Sept. 15. 12 Mar. 2025, Oregon.gov.

Tessler, D.F., J.A. Johnson, B.A. Andres, S. Thomas, & R.B. Lanctot. 2014. A global assessment of the conservation status of the Black Oystercatcher *Haematopus bachmani*. *International Wader Studies* 20: 83–96.

U.S. Fish and Wildlife Service. 2021. Birds of Conservation Concern 2021. United States Department of the Interior, U.S. Fish, and Wildlife Service, Migratory Birds, Falls Church, Virginia. [https://legacy-assets.eenews.net/open\\_files/assets/2021/06/15/document\\_gw\\_02.pdf](https://legacy-assets.eenews.net/open_files/assets/2021/06/15/document_gw_02.pdf)



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

James Todd

**Date comment received:**

February 13, 2026 09:23 PM

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

**Public comment:**

Thank you for the opportunity to comment on Oregon Parks & Recreation Department's proposed rule for drones in Oregon State Parks. For the past five seasons, as a volunteer for the Bird Alliance of Oregon and OPRD, I have monitored nesting of the threatened Snowy Plover on Oregon beaches. I have observed the dramatic effects of flying objects such as paramotors and drones on plover behavior. The birds are easily flushed from their nests, roosting and foraging sites by the movement and noise. The ensuing panic is an energy drain and jeopardizes plover survival. It can also leave chicks and eggs unprotected during critical periods which increases mortality. I appreciate the draft rules specifically prohibiting drone use in Snowy Plover management areas, but urge an expansion of these prohibitions. Drone use should also be prohibited in Rocky Habitat Management Areas, Marine Reserves and Marine Protected Areas. There should be no take off and landing within a half mile buffer zone surrounding these areas. Stricter measures will also enhance protection of Black Oystercatcher, Brown Pelican, Caspian Tern, and other at risk species listed on Oregon's State Wildlife Action Plan.

Most Oregon State Park visitors come to experience the natural beauty, wildlife and tranquility. Our parks are a refuge from the fast paced, noisy disturbances of everyday life. Only a small fraction of users will operate drones. Drones should be restricted to a small number of limited areas that are not used by sensitive wildlife and are removed from the quiet world that most State Park visitors profoundly enjoy.

Thank you for your consideration of my comments. I hope the final OPRD rules will provide adequate protection against the disturbance caused by drones.

Sincerely,  
James G. Todd



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Jen Elbek

**Date comment received:**

February 13, 2026 10:19 PM

**Commenter email (if provided):**

jenelbek@gmail.com

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

**Public comment:**

Dear Oregon Parks and Recreation Department,

Thank you for adopting new rules that will give State Park managers effective tools to regulate drone use in Oregon's state parks. As you move forward with implementation, please prioritize the protection of wildlife and the visitor experience that makes our parks so special.

Drones are perceived as predators by birds and other wildlife, causing significant disturbance—particularly to nesting birds. Given these documented impacts, OPRD should take a precautionary approach when determining where and when drone use should be permitted.

Each year, millions of Oregonians and out-of-state visitors come to our state parks to enjoy beautiful landscapes, observe wildlife, and find quiet respite from daily life. While only a small fraction of park users operate drones, the noise and intrusion from these devices affect the natural experience for the vast majority of visitors and pose real threats to sensitive wildlife and scenic habitats. OPRD should honor what most people seek in our parks by limiting drone use to a small number of designated areas: places that are not frequented by visitors seeking natural solitude and that do not serve as habitat for sensitive species.

Oregon's newly updated State Wildlife Action Plan identifies over 70 at-risk bird and mammal

species, many of which are known to be negatively impacted by drones. This includes the Black Oystercatcher, Brown Pelican, Caspian Tern, Peregrine Falcon, Harbor Seal, and Steller's Sea Lion, among others. Protecting these vulnerable populations must be a priority.

The draft rules specifically prohibit drone use in Snowy Plover management areas, which is appreciated. These protections should be extended to include all Rocky Habitat Management Areas, Marine Reserves, and Marine Protected Areas.

Finally, OPRD should adopt a policy prohibiting drone takeoff and landing within a half-mile buffer of OPRD-managed land adjacent to all U.S. Fish and Wildlife Service refuges and other federally designated wildlife protection areas.

Thank you for considering these recommendations as you work to balance recreational opportunities with the protection of Oregon's irreplaceable natural heritage.

Sincerely,

Jen Elbek



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Chris Wold

**Date comment received:**

February 13, 2026 10:52 PM

**Commenter email (if provided):**

cwold4255@gmail.com

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

**Public comment:**

Dear OPRD,

Please find attached the comments of the Friends of Haystack Rock (FOHR) concerning OPRD's draft rules relating to Unmanned Aircraft Systems, including drones. We thank you for this opportunity to comment on the draft rules. If you have any questions about these comments, please feel free to contact me.

Best regards,  
Chris Wold  
FOHR Board Member

Re: Draft OPRD Rules on Take-off and Landing of Unmanned Aircraft Systems

Dear Oregon Parks and Recreation Department:

The Friends of Haystack Rock (FOHR) appreciates the opportunity to comment on the draft Rules

developed in response to Senate Bill 109 (2021) concerning Take-off and Landing of Unmanned Aircraft Systems on properties managed by the Oregon Department of Parks and Recreation (OPRD). As an organization committed to protecting the bird life and other wildlife of Haystack Rock and the surrounding marine environment, these rules are of great importance to us.

We begin our comments by noting generally that it is difficult to comment on the draft rules without

the maps that OPRD will publish to indicate the locations of UAS Operation Areas. Without those

maps, we are unable to see how OPRD will interpret the general criteria for designating such areas

included in the draft rules: “visitor safety, resource protection, user conflict, operational constraints, or other management objectives.” OAR 736-010-0040(13)(b), OAR 736-021-0100(5)(b). We remain adamant that landing and taking off of UAS should be prohibited on Cannon Beach and similar areas — areas known for breeding tufted puffins, black oystercatchers,

and other birds sensitive to disturbance including during the migration and winter season as well.

Drone use is rapidly increasing,<sup>1</sup> including in Oregon State Parks and on its beaches and rocky headlands.<sup>2</sup> This drone use is leading to increases in disturbances<sup>3</sup> to nesting seabirds/shorebirds/waterbirds,<sup>4</sup> marine mammals,<sup>5</sup> and other wildlife. These areas — particularly

Cannon Beach — are also areas of high public use in both summer and winter placing visitor safety, as well as visitor enjoyment, at risk.

As a result, we strongly support the presumption against the operation of Unmanned Aircraft Systems (UAS), such as drones, on lands managed by OPRD unless expressly permitted.

Importantly, this presumption does not harm UAS users in a significant manner. OPRD manages a park system that encompasses 113,142 acres, the Willamette River Greenway’s 3,838 OPRD-managed

acres, and 362 miles of Oregon shore.<sup>6</sup> The Oregon Department of Fish and Wildlife owns or manages nearly 200,000 acres of land for wildlife use and public recreation,<sup>7</sup> lands on which drones are prohibited.<sup>8</sup> Collectively, this is an extraordinarily small area relative to the total

size of Oregon at 61.8 million acres.<sup>9</sup> Altogether, the draft rules presumption against UAS operation applies to just a tiny fraction of Oregon—around 1%.<sup>10</sup>

Most of the remainder of Oregon’s 61.8 million acres would be available for the landing and taking

off of drones without permits or permission, including beautiful forests, high deserts, and other natural areas. Thus, comments about the lack of available sites to operate UAS made by some individuals during the public meeting on January 20, 2026 are simply not true. Lands managed by

the Bureau of Land Management and the U.S. Forest Service, which cover more than half of Oregon,<sup>11</sup> are typically available for landing and taking off of drone, although some sites, such as

Yaquina Head Flying bar drones (and kites and model airplanes) because they are “disruptive to wildlife.”<sup>12</sup> Other areas may be off limits, such as designated wilderness and other areas designated as sensitive or off limits for security or other reasons. Nonetheless, the general proposition stands:

almost all of Oregon is available for UAS operation.

Our remaining comments focus on specific ways that the draft rules could be improved.

**Criteria for Designating UAS Operation Areas**

As suggested above, we think the criteria for designating, modifying, suspending, or rescinding a

UAS Operation Area are too general and too vague. The criteria, which can be found in four separate places in the draft rules, allow OPRD to designate, modify, suspend, or rescind a UAS Operation Area at any time based on “visitor safety, resource protection, user conflict, operational

constraints, or other management objectives.” OAR 736-010-0040(13)(b); OAR 736-010-0040(13)(d)(A); OAR 736-021-0100(5)(b); OAR 736-021-0100(5)(d)(A). These phrases can be

interpreted in a variety of ways with no clear guidance as to how to interpret them. A Working Group established by OPRD worked diligently and across different interests to create more specific criteria to identify areas where the operation of UAS would be (1) prohibited, (2) conditional, or (3) Open. OPRD personnel stated during the second meeting of the UAS Rules Advisory Committee (RAC) that agency staff would use these criteria in establishing prohibited and open areas. We believe that those criteria should be included in the rules, thereby requiring OPRD staff to use them.

We note that some elements of the Working Group's criteria have been expressly incorporated into the draft rules. For example, UAS Operation Areas are prohibited in overnight facilities. OAR 736-010-0040(13)(f)(A). As an alternative to incorporating fully the criteria developed by the Working Group, OPRD could include some of the more important criteria in the rules in the same way it has done for overnight facilities. For FOHR, we recommend that the rules specifically prohibit UAS Operation Areas in the following two areas agreed by the Working Group:

- (1) "Areas sharing a boundary to federally or state protected areas explicitly prohibiting drone takeoff and landing," and
- (2) "Areas that contain federally protected species that are negatively affected by drones based on current research."

The first criterion is critical to ensuring consistent rules relating to operating UAS on adjacent properties. Without consistent rules, OPRD could undermine the work of federal agencies. This is particularly relevant on the Oregon coast due to the presence of the Oregon Islands National Wildlife Refuge, which protects 1,853 small islands, rocks, and reefs plus two headlands. According to the U.S. Fish & Wildlife Service, these islands provide "breeding and resting habitat for diverse communities of birds, marine mammals, and plants along the wave-battered coastline."<sup>13</sup> Allowing the operation of UASs on adjacent beaches would almost certainly result in adverse impacts to many wildlife species, such as black oystercatchers and tufted puffins, among many others, that rely on the wilderness status of these islands for their continued survival. Moreover, data already show that many shorebirds and seabirds are sensitive (that is, adversely affected) by the presence of drones<sup>14</sup>.

The second criterion is critical for similar reasons; the operation of UAS on OPRD properties adjacent to areas containing federally protected species would undermine federal efforts to protect these species. In fact, many federally protected species are known to be adversely impacted by drones.

For example, drone use can cause breeding pairs of bald eagles to abandon nests for the season.<sup>15</sup>

We also urge the inclusion of a new criterion for expressly prohibiting the operation of UAS: marine gardens and marine reserves and areas adjacent to them. Marine gardens are designations

intended to preserve the ecological integrity of an important rocky habitat area, while maintaining public access and providing for education with a strong representative intertidal habitat.

Marine reserves are areas within Oregon's Territorial Sea or adjacent rocky intertidal area that are protected from all extractive activities, including the removal or disturbance of living and nonliving

marine resources, except as necessary for monitoring or research to evaluate the reserve's condition and effectiveness, or the impact of stressors on the reserve. While we would argue that most, if not all, of the coast is special and deserving of a prohibition against UAS operation, the state of Oregon has identified and designated marine gardens and marine reserves as unique and worthy of higher levels of protection. OPRD should expressly recognize the value of marine gardens and marine reserves by prohibiting UAS operation on them and adjacent to them. Relationship of OAR 736-010-0040(13)(b) and OAR 736-010-0040(13)(d)(4) FOHR is unclear about the relationship between paragraphs 13(b) and 13(d)(A) of OAR 736-010-0040. Both refer to designating, modifying, suspending, or rescinding UAS Operation Areas. However, they differ in three important ways. First, decisions can be made under paragraph 13(b) due to "user conflict" and "other management objectives" but not under paragraph 13(d)(A). Is this an oversight or is there some reason for the omission? If intentional, please explain the reason for the difference because the reason is not selfevident. Second, decisions made under paragraph 13(d)(A) must be documented, but not under 13(b). Again, is this an oversight? There does not seem to be any logical reason to exclude documentation of important decisions under one provision and not the other. Third, decisions made under paragraph 13(d)(A) must be posted for at least 30 days prior to becoming effective, but decisions made under paragraph 13(b) do not. This suggests that decisions can be made under paragraph 13(b) are those made due to fast changing circumstances or new information. However, that is not clear, especially because it is paragraph 13(d)(A) that refers to make decisions as required in an emergency.

However, and importantly, paragraph 13 says that a person may only operate a UAS in areas designated under subsection (b). Thus, even though paragraph 13(d)(A) allows for new designations of UAS Operation Areas, paragraph 13 does not allow UAS to be operated in areas designated pursuant to paragraph 13(d)(A). We assume that is not OPRD's intent. For all these reasons, we strongly recommend that the authority included in draft paragraphs 13(b) and 13(d)(A) be combined into a single paragraph. We recommend that paragraph 13(b) be rewritten as follows and paragraph 13(d) be deleted in its entirety. We have added a couple of additional phrases — underlined for easy identification — that add additional clarity to the provision. We believe our proposed text is consistent with OPRD's intent without changing the rules substantively, except perhaps to specify that any decisions be documented "in writing."

(13) A person may only operate an unmanned aircraft system from park property wholly within a UAS Operation Area designated under subsection (b). The person must comply with all conditions set by the department, including any UAS Pass requirements under subsection (e).

...

(b) The director or their designee may designate, modify, suspend, or rescind a UAS Operation Area at any time based on visitor safety, resource protection, user conflict, operational needs or constraints, or other management objectives.

(A) The department will publish a map of each UAS Operation Area and the its conditions for operating an unmanned aircraft system in each Area on its website at least 30 days before the designation becomes effective, except

when immediate action is required in an emergency. In addition to identification of UAS Operation Areas in a map posted on the department's website, UAS operation areas may also be identified through signage or other public communication methods.

(B) The department will document in writing the basis for designation or modification.

...

(d) The department will publish a map of each UAS Operation Area and its conditions on its website at least 30 days before the designation becomes effective, except when immediate action is required in an emergency. UAS operation areas may also be identified through signage or other public communication methods.

(A) Designations may be added, modified, suspended, or rescinded on a temporary or long-term basis based on visitor safety, resource protection, seasonal conditions, or operational needs.

(B) The department will document the basis for designation or modification.

Relationship of OAR 736-021-0100(5)(b) and OAR 736-021-0100(5)(d)

The concerns raised above with respect to OAR 736-010-0040(13)(b) and OAR 736-010-0040(13)(d)(4) apply equally to the relationship of OAR 736-021-0100(5)(b) and OAR 736-021-0100(5)(d). As the language of the relevant provisions is identical, we will not repeat our arguments. We recommend that OAR 736-021-0100(5)(b) be amended in the same way as OAR 736-010-0040(13)(b) and, consequently, that OAR 736-021-0100(5)(d) be deleted in full.

\* \* \*

Thank you for this opportunity to comment on the draft rules. If you have any questions about these comments, please feel free to contact me.

Sincerely,  
Chris Wold

Board Member, Friends of Haystack Rock



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Donna Acord

**Date comment received:**

February 13, 2026 11:05 PM

**Commenter email (if provided):**

donna.acord@gmail.com

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

**Public comment:**

Dear OPRD,

I am writing as someone who has volunteered with Oregon's State Parks, as a naturalist leading educational walks and hikes as well as a community scientist for Bird Alliance of Oregon, participating in surveys of sensitive species, such as the Snowy Plovers. I've done this at parks including Tryon Creek, Wapato on Suave Island, at several coastal parks who participate as Oregon Whale Watch Sites, and at Bay Ocean spit collecting data about Snowy Plovers. In a number of these activities, I have experienced the operation of drones and learned of the failure of nests and chicks attributed to drone presence and actions.

In addition to threats to wildlife, drone operation diminishes the sense of being out in the peace and beauty of our wild places. In a recent encounter, my family was at the beach last year to gather in memory of my brother, who we just had lost to a long battle with cancer. It was at a favorite place of his, and the tranquility and poignancy of the moments were marred by the operation of drones nearby.

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.

I urge OPRD to strengthen its rules and include a strong "roll out" plan to help best protect nesting birds, marine mammals, and other wildlife from drone disturbances.

- 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 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.



Sincerely,

Donna Acord



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Marita Ingalsbe

**Date comment received:**

February 14, 2026 05:07 AM

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

**Public comment:**

Dear Oregon Parks. Thank you for preparing these rules. I especially support the draft rule that prohibits drone use in Snowy Plover management areas, and would like drones to also be prohibited in Rocky Habitat Management Areas, Marine Reserves and Marine Protected Areas for greater wildlife protection. In Oregon Park land that is adjacent to a Federal wildlife refuge, please adopt rules prohibiting drones taking off and landing within a half mile of the wildlife refuge.

Thank you.

Marita Ingalsbe



# Submit a public comment on a rule

**Oregon Parks and Recreation Department**

**Commenter name (if provided):**

Ginny McVickar

**Date comment received:**

February 14, 2026 04:04 PM

**Commenter email (if provided):**

mcvickarg@gmail.com

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

**Public comment:**

I believe the the use of drones, especially over critical nesting areas, both along the coast of Oregon and in forests and fields as well, is very detrimental to wildlife. I acknowledge it would be extremely difficult to enforce restrictions of the use of drones, I still support the prevention of drones in any of the natural resources State Parks has, especially during the months of nesting and migration seasons.



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Barbara Bryson

**Date comment received:**

February 14, 2026 06:26 PM

**Commenter email (if provided):**

Bbryson150@gmail.com

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

**Public comment:**

Dear Mr. Ellison and ORPD staff,

Please protect our wildlife and humans from the intrusion of drones. These machines disrupt breeding birds, many of which are already threatened. They also cause noise and distraction, interfering with the natural sounds and environment of nature.

Give state park staff the tools to stop drones.

Thank you,

Barbara Bryson



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Paul Krissel

**Date comment received:**

February 14, 2026 08:02 PM

**Commenter email (if provided):**

pkrissel@outlook.com

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

**Public comment:**

Please keep drones out of state parks except for very limited uses requiring a permit. Uses such as scientific research, television documentaries on wildlife and landscapes, and similar uses. No recreational use should be allowed. They disturb the habitat and they disrupt the experience of enjoying nature for those of us visiting the parks.



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Rong Wu

**Date comment received:**

February 14, 2026 08:54 PM

**Commenter email (if provided):**

rongwu798@gmail.com

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

**Public comment:**

To Oregon Parks and Recreation Department:

Please cancel the current draft rules and encourage responsible drone photography in the great lands you manage. You should copy policies from the National Forests and FAA, legitimate concerns are already covered with existing rules.

- 1.) Drone photography, unlike other recreational activities, is protected under the First Amendment. Free speech does not stop at the park border — the draft rules miss this point and may not be enforceable.
- 2.) Park directors are openly discriminatory towards drone photography, while at the same time welcoming camp fires, rock climbers, horses, motor boats, civil aviation, domestic dogs and other activities with worse impacts. Drone photographers are not lowest tier recreationalists, we make content that capture outdoor stories for generations to come. Drones get smaller, safer and quieter every year.
- 3.) Activist groups say drones disturb wildlife, yet meta analysis of peer-reviewed studies show when best practices are followed, drones may be less disruptive than hikers, even to nesting birds. See <https://doi.org/10.5751/JFO-00259-940203>. The Western Snowy Plover faced declines over three decades ago, long before drones took flight. No study has actually shown a decrease in wildlife population because of recreational drones, the damage is assumed by folks offended by any motorized device. Freedom does not start where irrational fear ends. Instead of trying to regulate airspace, which OPRD cannot do, use your influence to encourage best practices.

Thank you for considering these comments.



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

cliff mitchell

**Date comment received:**

February 14, 2026 09:42 PM

**Commenter email (if provided):**

cliffmitchell1@yahoo.com

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

**Public comment:**

Please strengthen regulations for drones in OR State Parks. No drones during peak visitor seasons, especially summer. Adopt high altitude limits when they are permitted. Protect all birding nesting areas with appropriate amount of closed areas and timing. Make some parks drone free all yr. People need places to go to get away from noisy machines of all types.



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Michelle Ritter

**Date comment received:**

February 14, 2026 10:00 PM

**Commenter email (if provided):**

michelleritter@yahoo.com

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

**Public comment:**

Dear OPRD,

As a citizen of Oregon, I love our parks and natural areas. I love our wildlife and their habitats. We must do what we can to protect them. I strongly support limiting drones in our natural areas. Not only can they disturb the natural habitats and behaviors of wildlife but they are also noisy and NOT NATURAL!

Keep our parks wild and natural!

Thank you,  
Michelle Ritter MD  
Portland, OR



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

SCOTT DOUGLAS

**Date comment received:**

February 15, 2026 12:09 AM

**Commenter email (if provided):**

scott@audiocam.com

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

**Public comment:**

I generally agree with your draft rules. I own a drone and they are fun to operate, but they can also be very irritating to others. There should be designated area for drones just like there should be designed places for mountain bikes. I hate meeting mountain bikes when I'm hiking in the forest and I don't want someone bussing me or animals with a drone either.

I like that there can be a permit process for exceptions to the rules for drones.

After Christmas a few years ago, a guy and his kids were flying a RC airplane at Finely National Wildlife Refuge. I let him know how inappropriate it was to fly there and they left. Some people don't think past the activity they want to do.

Cheers, Scott



# Submit a public comment on a rule

**Oregon Parks and Recreation Department**

**Commenter name (if provided):**

Marcie Rosenzweig

**Date comment received:**

February 15, 2026 01:22 AM

**Commenter email (if provided):**

marciewrosenzweig@gmail.com

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

**Public comment:**

Agree with the bill. The increase in drones intruding on all wildlife but especially nesting birds is an ecological disaster in the making.



# Submit a public comment on a rule

**Oregon Parks and Recreation Department**

**Date comment received:**

February 15, 2026 01:31 AM

**Commenter email (if provided):**

sgoregon@gmail.com

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



# Submit a public comment on a rule

**Oregon Parks and Recreation Department**

**Commenter name (if provided):**

Carol Malley

**Date comment received:**

February 15, 2026 02:20 AM

**Commenter email (if provided):**

cmalley45@gmail.com

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

**Public comment:**

Please limit drone use in State parks. If permitted they should be restricted to maybe search and rescue or the like by responsible operators. Thanks Carol Malley Port Orford business owner for 35 years



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Bob Morrow

**Date comment received:**

February 15, 2026 02:28 AM

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

**Public comment:**

Yup - Another State Park Lover - Against Drones - in State Parks.

That buzzing you hear as you walk through a state park should be a mosquito not a drone. That flock of birds taking flight off a rocky ledge should not be fleeing a drone but nesting quietly.

There is enough pressure on nature already.

ORPD Please don't make it worse.

ORPD Please make the easy call.

ORPD Please make it a blanket policy - clear and concise.

No Drones Allowed in any Oregon State Parks.

Sincerely,

Bob Morrow

Langlois, Oregon



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Beth Flake

**Date comment received:**

February 15, 2026 05:10 PM

**Commenter email (if provided):**

elfio@yahoo.com

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

**Public comment:**

Thank you for considering appropriate regulations on drone use in Oregon natural areas. Millions of Oregonians and visitors come to Oregon for the incredible natural experiences. Very few of these people use drones, but the noise and impact on wildlife affect everyone. ORPD should strictly limit the areas that drones are allowed and keep them out of any sensitive wildlife areas.

I appreciate that the State Park draft rules prohibit drone use in Snowy Plover management areas, but that should be expanded to other impacted areas like Rocky Habitat, Marine Reserves and Marine Protected areas.

Please adopt no take off and landing rules with a minimum 1/2 mile buffer in OPRD managed land around all USFW and other federal lands that protect wildlife.

Please bring peace and quiet back to our wildlands.

Thanks for your consideration



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Hava dennenberg

**Date comment received:**

February 15, 2026 06:01 PM

**Commenter email (if provided):**

dennenberg.hava@gmail.com

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

**Public comment:**

As someone who frequents places in nature and as someone who has seen DIRECTLY the disturbance that drones cause to our natural habitats, I STRONGLY URGE OPRD to strengthen drone rules and include a strong “roll out” plan to help best protect nesting birds, marine mammals, and other wildlife from drone disturbances. Anything short of this is UNACCEPTABLE. Our wildlife are ALREADY in profound peril. We do not need to be doing anything else that is going to add to this distress and lead to more deaths with populations already in steep decline (many moving toward EXTINCTION.

**Over a million**

seabirds and

shorebirds nest along Oregon’s coastline every year including the endangered Western Snowy Plover and at-risk species like the Tufted Puffin.

**A growing body of science indicates improper drone use is increasingly a cause of wildlife disturbances, leading to nest failures and other impacts contributing to wildlife population declines**

. Bird

Alliance of Oregon’s Snowy Plover and Black Oystercatcher monitoring programs document many drone/wildlife disturbances every year on the coast.

These drone behaviors will only increase if State Parks does not have strong rules in place and a reasonable plan to roll out the new regulatory process.

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.

In 2021 the Oregon legislature directed OPRD to develop rules for drones. The agency pulled together a workgroup (including Bird Alliance of Oregon) to develop [criteria](#) where drone use should be prohibited (red zones), allowed conditionally (yellow zones) and allowed all the time (green zones).

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

I would also URGE OPRD to make the following changes and additions to its plan:

A) 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.

B)  
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.

C) 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.**

D)  
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.

For the Animals and Fragile Ecosystems,

Hava Dennenberg





# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Kris Vyverberg

**Date comment received:**

February 15, 2026 06:11 PM

**Commenter email (if provided):**

Kris.vyverberg@gmail.com

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

**Public comment:**

Dear OPRD,

Thanks for the opportunity to comment on your drone rules. Like most people I go to State 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, but their noise and intrusion affect many park visitors, and also birds.

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.

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 a new technology that has potential to have major impacts on park resources, including solitude, privacy, and wildlife habitat.

If drones are permitted at all, it should be only in tightly limited areas, and in only a small set 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 our view.

Sincerely,

Kris and Kirk Vyverberg  
Port Orford, Oregon



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Gloria Allen

**Date comment received:**

February 15, 2026 06:31 PM

**Commenter email (if provided):**

gloria8557@icloud.com

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

**Public comment:**

PLEASE: Please 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. Oregon has always been one of the states that so values its environment and protection of all species. Please help us continue to protect our wildlife for the our children's future.



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Kamala Bremer

**Date comment received:**

February 15, 2026 10:44 PM

**Commenter email (if provided):**

dkbre@aol.com

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

**Public comment:**

In addition to my earlier comments discouraging use of drones in Oregon State Parks, I would like to add that it is critical that education and enforcement be a part of any drone usage that is allowed in State Parks. Without this, there are likely to be frequent conflicts between the small number of users who want to fly drones, and the large number of visitors who would rather experience the traditional values of quiet and connection with nature.

Since Oregon Parks is not being given any additional funds for enforcement of drone rules, it would be sensible for OPRD to link its drone policy to Washington State's policy. Washington has a well-developed mostly self-issued Permit system in place for drone users, along with a modest fee which can be used to fund enforcement and education. Permits (with dates and locations) would allow Park Rangers to identify who may have violated regulations and ban them from further permits, or impose other sanctions as the law requires. Using the same system as Washington would further reduce the need for education somewhat, as both states would have similar requirements.

Please remember that drones, once launched, can (and do) go anywhere. It only takes one ignorant or willful operator to significantly disrupt wildlife, or disturb everyone else's peaceful day at the Park. Please do your best to create rules that keep that from occurring.

Thank you.



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Andrew Barker

**Date comment received:**

February 15, 2026 11:38 PM

**Commenter email (if provided):**

abarker62@gmail.com

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

**Public comment:**

As someone who has conducted surveys of endangered bird species on the North Oregon coast for many years, I know how sensitive these birds are to perceived airborne threats. They don't know the difference between a drone and a natural predator bird when observed flying above them.

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. OPRD should also 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):**

Florence Prescott

**Date comment received:**

February 17, 2026 06:00 PM

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

**Public comment:**

Dear OPRD,

I am writing to express my concern about the take off, use and landings of drones in our state parks. As a long time resident of Port Orford who uses our beautiful local state parks often multiple times per week for recreation, contemplation, nature studies and wildlife observation, I lean strongly towards not allowing drones in the parks.

There are few things more annoying than being startled and annoyed by the sudden arrival of a drone and its ongoing irritating buzz while being out peacefully enjoying nature. As a volunteer doing Black Oystercatcher surveys on our coast, it is incredibly dismaying to realize that drones are disrupting mating, nesting, hatching and fledging of these iconic birds, not to mention the other birds and wildlife whose breeding and feeding patterns are affected by drones.

Even just one drone in an area can disrupt the peace and fragile tranquility that humans love about being in nature and that birds and animals need for their very survival. Please follow the example of many other states and do not allow drones in the parks.

Thank you,  
Florence Prescott



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Ann Vileisis

**Date comment received:**

February 17, 2026 06:07 PM

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

**Public comment:**

Thank you for the opportunity to comment on OPRD’s proposed drone rules. I am writing on behalf of the Kalmiopsis Audubon Society—representing our more than 400 members on the South Coast who care about habitat for birds and wildlife and who also cherish the opportunity to hike, enjoy, and peacefully observe the beautiful natural environments of our cherished coastal state parks and beaches. Our concerns about drones reflect those two perspectives.

We appreciate that the proposed rules will give OPRD managers new tools to address drone conflicts, but without maps, it remains difficult to understand how management will actually occur on the ground in our parks. 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.

**Bird and wildlife concerns**

As Audubon president, I’ve heard concern from many members about drones and birds—including local reports of drones harassing osprey nests and black oystercatchers. The Oregon coast Black Oystercatcher monitoring project, in which many of our members participate—have documented a rate of three to five drone disturbances per week at active nests over the past five years! Listening to public comments at earlier OPRD hearings about this topic, I heard about more drone disturbance of seabirds at other sites up and down the coast. Of course, the heartbreaking 2021 incident of a recreational drone disturbing the Elegant Tern colony at Bolsa Chica Reserve in southern California is a cautionary tale about the potential for drones to have population level impacts for colonial nesting birds.

It's crucially important to note that Oregon hosts one-half of the West Coast's seabird breeding habitat, with 55% of that on our South Coast (U.S. Fish & Wildlife Service, Catalog of Oregon Seabird Colonies, BTP-R100902007). These include birds as iconic and fun to watch as Tufted puffins and bright, red-footed Pigeon Guillemots, plus murrelets, gulls, storm petrels, and cormorants. Many of our coastal seabirds nest on rocks not far offshore and could be highly vulnerable to drone disturbance. The federally-threatened beach-nesting Western Snowy Plovers are, of course, also highly vulnerable to drone disturbance.

We appreciate that the proposed rule puts snowy plover beaches off limits to drones and that rules disallow harassment of wildlife. However, we remain concerned about other wildlife and birds that nest in or use rocky habitat and the offshore rocks that are nearshore. For example, state sensitive Black Oystercatchers, like many rocky habitat denizens, have dark coloring that camouflages them from predators, but this same trait will make it difficult for drone operators to see them before getting too close. In other words, even if a drone operator was not intending to harass wildlife, the disruption could occur unwittingly. For this reason, we strongly urge OPRD to take a highly precautionary approach when considering if and where drones should be allowed in coastal parks and ocean shore areas. The rules should prohibit drone use in all Rocky Habitat Management Areas, Marine Reserves and Marine Protected Areas. The drone rules should also prohibit drones in areas with known state or federal sensitive, threatened, or endangered species that could be impacted by UAS use.

It's important to note that birds not only use the shoreline for nesting but also for foraging during migration, and migration along Oregon's coast can last for an extended period with different birds coming through at different times. For that reason, restricting drone use temporally to avoid breeding season would be inadequate, especially to protect at risk species.

Moreover, most of the nearshore offshore islands and seastacks –where birds nest, are part of the Oregon Islands National Wildlife Refuge, most of which is federal-designated wilderness, where drone flight is not allowed. The wilderness designation helps to protect the wildlife values of these protected habitats and so we strongly urge you to coordinate with the U.S. Fish and Wildlife Service to ensure that OPRD drone maps will not create conflicts or situations where wildlife will be subject to disturbance. We'd like to see a prohibition on drone take-off and landing sites at park and shoreline areas adjacent to national wildlife refuge areas. At the very least, there should be a substantial buffer.

Wildlife's value as part of recreation

I want to underscore that a big reason our members, local residents, and many other people love

to visit our coastal parks is specifically to watch birds and wildlife. I regularly visit a local state park and talk to visitors about the birds, whales, and seals hauled out on rocks that they are literally DELIGHTED to be seeing! I often see people walking with binoculars on the trail. Bird watching and wildlife viewing are extremely popular recreational activities that draw not only Oregonians but visitors from all over America to Oregon's coastal parks.

The most recent studies related to the economic values of recreational watching wildlife is the U.S.

F&WS, 2022, National Survey of Fishing, Hunting and Wildlife-Related Recreation, which determined that there are 96.3 million birders in America and an estimated 42.6 million birders that made trips out-of-state to watch birds. Nationally, wildlife watching accounted for recreational expenditures of a staggering \$250.2 billion—far greater than hunting and fishing. The

previous iteration of this study (2016) had documented a trend of increasing interest in wildlife watching—though a change in methodology with the most recent study makes direct comparison

with previous numbers no longer possible. The most recent economic data specifically for recreational watching Oregon wildlife is far older—a report commissioned by ODFW and Travel Oregon from 2009 (Dean Runyan Associates, Fishing, Hunting, Wildlife Viewing, and Shellfishing in

Oregon, 2008 State and County Expenditure Estimates). At that time travel-generated expenditures for recreational wildlife viewing on Oregon's Coast accounted for \$165 million. That

translates to \$248.26 million in 2026 dollars. Although we don't regard generating economic activity as a primary function of state parks, it is a secondary benefit for coastal communities that

can be complementary to State Parks mission.

This is all to underscore that recreationists who watch birds and wildlife are a hugely important constituency for Oregon State Parks---they are a key group of your visitors, and so we hope that you will recognize this as you move forward with your rulemaking. To my knowledge, OPRD has not provided any estimates on numbers of drone users or the economic value they generate for communities --but surely drone use provides only a fraction of the personal, economic, and wildlife values afforded by recreational wildlife watching.

Solitude, quiet, privacy concerns

Beyond impacts to wildlife, I have had—and have heard from several of our members about—negative personal experiences with drones, buzzing loud and low over the heads of people otherwise enjoying moments of peace and serenity while beach walking or watching the sunset over the Pacific. It breaks my heart to think we will lose still more places to restore our spirits without the incursion of noisy technologies.

Several drone users in their comments have said it's not their intention to harass people or wildlife, or that such activities are already illegal. However, we have also read and heard in comments that many citizens have already experienced or witnessed harassing drone activity that

has potential to damage wildlife and also to wreck other visitors' recreation experiences, including

several who have commented on the creepy and intrusive nature of drones.

As you well know, the mission of the Oregon Parks and Recreation Department (OPRD) is “to provide and protect outstanding natural, scenic, cultural, historic and recreational sites for the enjoyment and education of present and future generations.” To successfully accomplish this mission, we think drone use must be tightly restrained. Our beloved Oregon state parks are popular destinations, and with increasing visitation, we need for OPRD to be proactive about protecting exceptional visitor experiences and minimizing wildlife disturbances into the future.

The matter of focus becomes all the more urgent given major budgetary shortfalls facing the agency. 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.

#### Public Process Concerns

We appreciate and support OPRD’s desire to take an adaptive management approach with this program as a way to be efficient with limited financial resources. That said, we think that posting of new drone maps on park websites for 30 days is insufficient because it does not give the public a clear opportunity to become informed about significant management changes and to provide input. We would prefer to see better public notice and an opportunity for public input. One idea would be to make sure park managers post proposed maps—or proposed changes to maps-- at Park Trailheads and in local newspapers rather than to rely solely on the park website. Another idea would be to provide notice to people who sign up for OPRD email announcements.

#### Enforcement and best practices

We remain concerned that there are few ways to enforce this rule since drone operators may be distant from sites of concern. Even if a park visitor witnessed harassment or experienced a problem, there is no guidance for how to report a violation. Also, there is no place for drone users to readily find best practices and rules for drone use in State Parks. A permit program would provide the opportunity for OPRD to educate drone users about park rules and best practices.

#### Recommendations

If UAS 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.

The rules should prohibit drone use in all Rocky Habitat Management Areas, estuaries, Marine Reserves and Marine Protected Areas, and in buffer zones to adjacent to national wildlife refuges or any other habitat reserve areas.

The drone rules should also prohibit drone use in areas with known state or federal sensitive, threatened, or endangered species, such as marbled murrelets, that could be impacted by UAS

use.

There should be a clearer public process for establishing or changing designated UAS areas.

In conclusion, drone use is still just emerging and growing. If Oregon doesn't start with a highly precautionary approach now, we are concerned that wildlife habitat in parks and visitors' experience will end up being significantly degraded, which would be a sad trajectory for Oregon's beloved State Park system.

Thanks for considering our comments.



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Fran Recht

**Date comment received:**

February 17, 2026 06:07 PM

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

**Public comment:**

I wish to comment on the proposed drone take off and landing rules.

I am a member of the public who lives in Depoe Bay and has long worked on conservation, including in the citing of the Fogarty Creek Marine Conservation area and in working to establish marine reserve and protected areas.

I have reviewed and endorse, the comments that were submitted by the Bird Alliance of Oregon and 9 Bird Alliance/Audubon chapters, Oregon Coast Alliance, Oregon Shores, Oregon Wild, American Bird Conservancy, Defenders of Wildlife, Cape Perpetua Collaborative, and Friends of Otter Rock Marine Reserve. These groups represent many tens of thousands of people who share a deep desire to conserve and protect the natural resources of Oregon.

As noted, it's not only these groups and people who support emphasizing conservation and quiet use of parks to enjoy nature and natural resources, it is all those people-- residents and visitors alike, who prefer this, as continually documented by OPRD's own SCORP studies over the years.

It is my personal experience and witness from living near Boiler Bay State Park and Fogarty Creek State Park that drones launched from these areas (despite signage prohibiting such use at Boiler Bay State Park) that drones have disturbed nesting murrelets, cormorants and black oyster catchers. I can attest too to the disruption to my enjoyment of these areas (especially due to my worry about disruption of birds) and to my sense of privacy by the noise and close proximity of drones when walking at Fogarty Creek State Park and at Otter Rock marine gardens.

My observation of continual violation of closure signs at Boiler Bay State Park, which attracts birders from all over the state and world, leads to the suggestion that any rules must be consistent and should be simplified. I believe that it would be easier for people to understand and for OPRD to enforce that all OPRD lands are closed to the launching of drones, unless otherwise designated. I.e. the default should be red.

I want to highlight and endorse the comments that say that birds are sensitive to disturbance whether they are breeding or not and that seasonal restrictions just tied to breeding and raising young are not sufficient for resource protection.

I want to also endorse and emphasize the need to restrict drone operations in OPRD and state lands that could effect resources in estuarine areas (including birds and marine mammals and their resting areas), rocky shore management areas, in marine reserve and marine protection areas and in those areas sharing a boundary with other protected areas (state or federal). There is a great need too to restrict drone operations in at least a half mile buffer around Oregon Island National Wildlife areas.

There are plenty of other areas in Oregon for private people to launch or retrieve their drones. OPRD state park land is not a place for such activities. There are too many existing resources and the public enjoyment and privacy at stake.

Thank you.  
Fran Recht



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Johanna Rayman

**Date comment received:**

February 17, 2026 06:08 PM

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

**Public comment:**

Dear Oregon Parks and Recreation Department,

I'm writing to support the Bird Alliance of Oregon's recommendation that OPRD adopt "no take off and landing rules in a 0.5 mile buffer in OPRD managed land adjacent to all Fish and Wildlife Service refuge" and other areas designated to protect wildlife populations and habitats.

Drones have a significantly negative impact my enjoyment of nature, but more importantly, they disturb birds and other wildlife, with serious impacts on nesting and survival. In particular the Bird Alliance of Oregon is recommending the prohibition of drone use in all Rocky Habitat Management Areas, Marine Reserves and Marine Protected areas.

Thank you for the time you have put into solving this problem.



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Joyce McGreevy

**Date comment received:**

February 17, 2026 06:08 PM

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

**Public comment:**

To whom it may concern,

I am writing to ask that you please ban, or at the very least greatly restrict, the use of drones in or over Oregon's state parks parks. Many of us who visit our parks do so to immerse ourselves in nature, and to take a break from the ubiquity of technology and its unnecessary (nonemergency) use.

Drones are disruptive. Their presence poses threat to wildlife, particularly birds. They also disrupt the peace and relative quiet that one would reasonably expect to experience in our state parks.

Please reconsider.



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Joe Liebezeit

**Date comment received:**

February 17, 2026 06:16 PM

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

**Public comment:**

RE: Public comment on draft rules to guide take-off and landings of drones in state parks and ocean shore

On behalf of 10 Oregon Bird Alliance/Audubon Chapters and 7 other organizations representing over 40,000 members statewide, we appreciate this opportunity to submit recommendations to improve the draft rules regarding take-off and landings of unmanned aircraft systems (UAS), hereafter referred to as “drones”, in state parks and on coastal areas managed by Oregon Parks and Recreation Department (OPRD). Senate Bill 109, passed during the 2021 legislative session, directed State Parks and the Recreation Commission to adopt rules managing the use of drones by people in OPRD administered lands. We appreciate, with the adoption of new rules, State Park managers will have tools to actually regulate drone use in state parks.

**Impact of Drones on Wildlife, Recreation, and Visitor Well-Being**

Drone use is rapidly increasing nationwide, including in Oregon State Parks and on its beaches and rocky headlands, and has, in turn, led to increasing disturbances to nesting seabirds, shorebirds, waterbirds, marine mammals, and other wildlife. For example, the Oregon Black Oystercatcher Project, coordinated by Bird Alliance of Oregon, documented a weekly average of three to five drone disturbances at active oystercatcher nests across the coast over the past five years (2021-25 - Bird Alliance of Oregon, unpublished data). Total observer effort per week was approximately 40 hrs so this estimate only includes a small fraction of the total time available for drone disturbances. Such disturbances have been documented to negatively impact demographic parameters such as reproductive success which could have population level impacts. In one dramatic case in 2021, a drone crash caused an entire colony of 3,000 Elegant Terns to abandon 1,500 active nests in California.

To minimize such impacts we need to ensure drone take-off and landing rules are informed by the best science and take a precautionary approach given that recreational drone use is a relatively new phenomena and impacts are just beginning to be understood. Oregon's beaches, rocky shores and state parks provide vital nesting grounds and migratory stopover habitats for millions of birds. Oregon's coast, in particular, supports 1.3 million nesting seabirds of 15 species representing more than half of all colonial nesting seabirds on the West Coast. The Oregon coast also provides critical pupping areas and haul outs for marine mammals. Several species that are vulnerable to drone disturbances include species listed under the federal Endangered Species Act (e.g. Western Snowy Plover) and/or are recognized as species of conservation concern in the Oregon Conservation Strategy (soon to be renamed the State Wildlife Action Plan) (e.g. black oystercatcher, Caspian tern, tufted puffin, Pacific harbor seal, etc.) and in other conservation planning documents.

In addition to impacts on wildlife, the growth and use of drones has intrusive impacts on existing recreational users in parks. The overwhelming majority of recreational users at parks do not go to these special places to experience drones or other motorized activities. On the contrary, they travel to these spaces for the natural world experiences they offer and most importantly, for their physical and mental health. According to OPRD's own Statewide Comprehensive Outdoor Recreation Plan (SCORP) recreational survey data recreational users' priorities in Oregon are dominated by experiences in nature such as viewing wildlife and experiencing quiet and scenic moments within the natural world that support physical and mental health. For some recreational users, drones may be experienced and felt like a threat to one's own healthy activities. To a hiker, biker, paddler or many other recreational users in our park systems, a drone can completely spoil an activity and, in some cases, can present dangerous situations. The potential conflicts that drone use creates with other existing recreational users should not be overlooked. When planning for rules and maps, OPRD should take these matters seriously. This seasonal density in parks visitation and crowding is both significant and extensive within the Oregon Parks systems. Tightly restricting designated take off and landing zones to low conflict areas will be critical to avoid recreational conflicts.

#### Overarching Draft Rules Comments

We strongly support OPRD's recommended approach of prohibiting drones/UAS on lands owned/administered by OPRD except in areas where they are explicitly permitted. There are plenty of places to operate drones in Oregon outside of state park lands; therefore, harm to drone user recreational opportunities is negligible. OPRD manages a park system that encompasses 113,142 acres, the Willamette River Greenway's 3,838 OPRD-managed acres, and 362 miles of Oregon shore.

The Oregon Department of Fish and Wildlife owns or manages nearly 200,000 acres of land for wildlife use and public recreation, lands on which drones are prohibited. Considering the total area of Oregon is at 61.8 million acres, the draft rules presumption against drone operation applies to only about 1% of

Oregon's total landmass - a tiny fraction. Most of the remainder of Oregon would be available to drone users without permits or permission. OPRD's original intention in the interval between convening the Drone Working Group and the more recent Drone Rules Advisory Committee (RAC) process was to create maps for all state parks and managed lands (including the ocean shore) depicting areas of drone use under OPRD's Drone Use Classification Criteria (Green = full use, Yellow = conditional use, Red = prohibited) that were developed by the multi-stakeholder Drone Working Group. However, OPRD explained at the start of the RAC process that they were unable to accomplish this task due to capacity constraints. While we understand this challenge, we want to note that without those maps it is difficult to provide substantive comments as we are unable to understand and evaluate how OPRD will interpret the general criteria for designating such areas included in the draft rules: "visitor safety, resource protection, user conflict, operational constraints, or other management objectives." OAR 736-010-0040(13)(b), OAR 736-021-0100(5)(b).

#### Recommended Improvements to Draft Rules

The criteria for designating, modifying, suspending, or rescinding a UAS Operation Area are too vague.

These criteria allow OPRD to designate, modify, suspend, or rescind a UAS Operation Area at any time

based on "visitor safety, resource protection, user conflict, operational constraints, or other management objectives." OAR 736-010-0040(13)(b); OAR 736-010-0040(13)(d)(A); OAR 736-021-0100(5)(b); OAR 736-021-0100(5)(d)(A). These phrases can be interpreted in a variety of ways and there is no guidance on how to interpret them. We recommend that OPRD incorporate the Drone Classification Criteria developed by the multi-stakeholder Drone Working Group directly into the rules. This would provide important guidelines and specificity on how OPRD staff will "designate, modify, suspend, or rescind" UAS Operation Area designations. We recommend that the rules specifically prohibit UAS Operation Areas in the following two areas agreed to by the Working Group:

- (1) "Areas sharing a boundary to federally or state protected areas explicitly prohibiting drone takeoff and landing," and
- (2) "Areas that contain federally protected species that are negatively affected by drones based on current research."

Furthermore, we recommend OPRD adopt drone no take off and landing rules in at least a 0.5 mile buffer in OPRD managed land adjacent to all U.S. Fish and Wildlife Service refuge and other federal lands designated to protect wildlife populations and habitats. These recommended changes to rules aim to ensure consistency in operating drones adjacent to federally protected lands as well as limiting the

chance that federal efforts to protect wildlife would not be undermined through drone disturbance. This is particularly relevant on the Oregon coast due to the presence of the Oregon Islands National Wildlife

Refuge, which protects 1,853 small islands, rocks, and reefs plus two headlands. According to the U.S.

Fish and Wildlife Service, these islands provide "breeding and resting habitat for diverse communities of birds, marine mammals, and plants along the wave-battered coastline."

Allowing the operation of drones on adjacent coastal areas would result in adverse impacts to many wildlife species that rely on

the wilderness status of these islands for their continued survival.

Under the Proposed Ocean Shore Rules OAR 736-021-0100(e) we appreciate that drone restrictions would apply to Western Snowy Plover Management areas (described in OAR 736-021-0090(15)).

We

also urge that the drone rules should explicitly prohibit drone use in the following areas:

● All Rocky Habitat Management Areas: There are 22 Rocky Habitat Management Areas in Oregon

designated as Marine Conservation Areas, Marine Research Areas, and Marine Education Areas (or Marine Gardens)

. These sites are designated under the “Rocky Habitat Management Strategy” - Chapter 3 of Oregon’s Territorial Sea Plan. The goal of the Rocky Habitat Management

Strategy is the long-term protection of ecological resources and coastal biodiversity within and among Oregon's marine rocky habitats, while allowing appropriate use.

● All Marine Reserves and Marine Protected Areas: Oregon has five Marine Reserve/Marine Protected Area Complexes that are protected from all extractive activities, including the removal

or disturbance of living and non-living marine resources, except as necessary for monitoring or research

● All areas in State Parks or OPRD managed lands that contain viable Marbled Murrelet Nesting Habitat: OPRD owns and/or manages 95 properties that support habitat suitable for marbled murrelet nesting including over 44,000 acres of land. In accordance with the OPRD’s Endangered

Species Management Plan Marbled Murrelet Conservation

19 developed to support the recovery

of this State ESA-listed species, the final draft rules should specifically prohibit drone use in these

sites with suitable murrelet nesting habitat as well as in a 0.5 mile buffer around these areas.

● All areas areas of state parks that include estuarine habitat

: Fifteen of Oregon’s estuaries and

bays have been identified as Important Bird Areas by Birdlife International and National Audubon, supporting tens of thousands of migratory birds every year including many at-risk shorebird species

. Oregon also includes “protection [of] natural resources, such as areas with significant fish and wildlife habitat” in its Estuary Management Plans through the designation of

“Natural Management Units”

. The state of Oregon has identified the areas described above as unique and worthy of higher levels of

protection. OPRD should recognize these state designated areas by prohibiting drone operation on them and adjacent to them.

Under Proposed Park Area Rules, OAR 736-010-0040 (d) and OAR 736-021-0100(5)(d) we are concerned

that only publishing a map on the OPRD website 30 days in advance of new sites being activated for

drone use is not enough time to inform drone users and the wider public of rule updates. Ideally

outreach should begin >60 days in advance of new site activation. We also recommend mandatory placement of signage and other public communication methods be employed. Under Proposed Park and Ocean Shore Area Rules, OAR 736-010-0040 13(e) and OAR 736-021-0100(5)(f), we recommend that a Drone Pass be required for all recreational drone users.

#### Recommendations on the Expected Roll Out Process of Drone Regulations

OPRD staff have described a “roll out” of drone usage on state park managed lands following the

adoption of rules as follows:

- A limited number of parks

23 will be identified as UAS operation areas if a park property is

determined to be appropriate for UAS operation based on resource, safety, and operational considerations. All other places for now would be prohibited for drone use (red zones).

- Based on final adopted rules and classification criteria, OPRD will use an adaptive management

process to consider expanding out to other parks where drones would be allowed conditionally (yellow) or all of the time (green). This will happen over months and years.

- Maps will be provided on OPRD website in advance of new sites becoming active

- Drone use areas may be altered over time at the discretion of OPRD staff based on input by park

users and other criteria.

We are generally supportive of this roll-out plan with the following changes/recommendations:

- Because the vast majority of visitors come to parks to enjoy beautiful landscapes, wildlife and quiet time (see reference to OPRD’s SCORP report above), 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.

- We recommend OPRD require recreational drone users to pay a small fee in order to operate drones in allowable areas. This can help defray some of the costs associated with implementing the drone rules especially at a time when OPRD is facing budget challenges. In addition, this would give OPRD an opportunity to require that operators testify to having read and understood

state rules and best practices. The Drone Working Group that developed Drone Classification Criteria also worked with OPRD to develop Recreational Drone Best Practices so this is already readily available.

- OPRD should also recognize that its responsibility to prohibit drone use for protection of birds

should not be restricted solely to protecting nesting/breeding grounds and only during nesting/breeding periods but should also include consideration of the full lifecycle of at-risk species. For example, we know that postbreeding black oystercatchers generally concentrate in winter flocks

ranging from a few to several hundred individuals across their range including in Oregon (unpublished data, Elise-Elliott Smith, USGS). Western Snowy Plovers also often remain near their breeding grounds in the winter. In the winter they tend to select habitats with more food and where they can more easily detect predators and so often congregate in loose flocks. While the wintering distribution patterns for these two species is currently not well

documented

in Oregon, OPRD should take a precautionary approach to opening up sites to drone use for

these two species as well as for all at-risk species as identified in the Oregon Conservation Strategy.

Drone use is an emerging and still growing activity. If Oregon doesn't start with a precautionary approach now, we are concerned that wildlife and the experience of park visitors will become degraded. We urge you to think proactively for the future as you finalize rules for adoption.

Thank you for considering our comments.

Sincerely,

Joe Liebezeit, Statewide Conservation Director

Bird Alliance of Oregon

Ann Vileisis, President

Kalmiopsis Audubon Society

David Harrison, Conservation Chair

Salem Audubon Society

Deborah Schlenoff, PhD, President

Coast to Cascades Bird Alliance

Kevin Spencer, President

Klamath Basin Audubon Society

Pepper Trail, Conservation Chair

Rogue Valley Audubon Society

Laurel Collins, Conservation Chair

East Cascades Bird Alliance

Kent Doughty, Conservation Coordinator

Seven Capes Bird Alliance

Karan Fairchild, Co-President

Mid-Willamette Bird Alliance

Harv Schubothe, President

Cape Arago Audubon Society

Cameron La Follette, Executive Director

Oregon Coast Alliance

Steve Pedery, Conservation Director

Oregon Wild

Dennis White, Board President

Friends of Otter Rock Marine Reserve

Hannah Epstein, PhD

Marine Conservation Manager

Oregon Shores Conservation Coalition

Talaina King

Executive Director

Cape Perpetua Collaborative

Colin Reynolds

Senior Advisor, Northwest Program

Defenders of Wildlife

Lindsay Adrean, Northwest Program Officer

American Bird Conservancy



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Doug Calamar

**Date comment received:**

February 17, 2026 06:16 PM

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

**Public comment:**

Good afternoon,

This letter regards drones in our Oregon State Parks. I am a resident of Oregon and have lived in this state since 1978. I visit our state parks regularly and love them. My feeling is that drones should NOT be allowed in our state parks in any way, shape, or form, with one exception. If the state park authorities feel it is necessary to use drones to help rescue somebody who is lost, or for some other type of real emergency, then I think it would be OK in those instances only. Otherwise, no drones at all should be allowed.

Thank you,  
Doug Calamar  
Grants Pass, Oregon



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Dianne Ensign

**Date comment received:**

February 17, 2026 06:18 PM

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

**Public comment:**

Thank you for the opportunity to 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. Birds and wildlife already face myriad threats to their existence, including habitat loss, climate chaos, pesticides, poaching...we should be helping them to thrive, not making it more difficult. This is especially true of Oregon's at-risk species, including 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.

Only a small fraction of state park 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. 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.

For all of these reasons, we urge OPRD to take a precautionary approach to where and when it allows drone use.

Dianne Ensign



# Submit a public comment on a rule

**Oregon Parks and Recreation Department**

**Commenter name (if provided):**

Charly Boone

**Date comment received:**

February 17, 2026 06:18 PM

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

**Public comment:**

Please do not allow drones in public parks

They would interfere with a lovely sounds of nature and we're not allow me to take my puppy relaxing walk

I know I'm just one person, but I'm sure there are more people like me

Please do not allow drones in public parks



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Steve Griffiths

**Date comment received:**

February 17, 2026 06:19 PM

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

**Public comment:**

As a full-time resident of the Central Oregon Coast and a very frequent user of the state's coastal parks, I'm pleased that, with the adoption of new rules for drone use, State Park Managers will now have the tools they need to regulate drone use in state parks – both to protect the visitor experience and to protect the birds and wildlife of the coast's natural environment

We know that drones disturb wildlife. There is ample evidence for that. They also have a negative impact on the visitor experience. I have had the unpleasant experience of drones hovering over me when I was walking on the beach. The drones interrupted my solitude and peace of mind.

I support:

- 1) Allowing drone use only in a small number of limited areas that are not used by sensitive birds and wildlife and that are not visited by people seeking the natural qualities of the Oregon coastal environment.
- 2) Prohibiting drone use in Snowy Plover management areas as well as *all* Rocky Habitat Management Areas, Marine Reserves, and Marine Protected Areas.
- 3) Adopting a no take-off and landing rules in a half-mile buffer in OPRD managed land adjacent to *all* U.S. Fish and Wildlife Service refuge and other federal lands designated to protect wildlife populations and habitats.

Thank you for providing the opportunity for me and others to comment on your efforts to protect the visitor experience and the natural values of our coastal environment.

Steve Griffiths, Lincoln City



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Linda Elfman

**Date comment received:**

February 17, 2026 06:19 PM

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

**Public comment:**

Dear ORPD,

Our state parks are so very precious to all of us, human and wildlife, alike. The drones are disruptive of the peace and tranquility, and I feel they should be excluded from our state parks.

Thank you,

Linda Elfman

Gold Beach, Oregon



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Jill Calamar

**Date comment received:**

February 17, 2026 06:19 PM

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

**Public comment:**

Please do not allow drone use in the state parks. Our family enjoys camping in the Oregon State Parks. We visit several parks every year. We love the natural beauty and the hiking. Drone noise in the parks would be very disturbing and the very opposite of why our family enjoys the state parks. There are also the privacy issues that use of drones brings up. Drone use should be restricted for law enforcement or rescues only.

Jill Calamar  
Grants Pass, OR



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Bonnie Kuppler

**Date comment received:**

February 17, 2026 06:20 PM

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

**Public comment:**

Dear OPRD,  
Thanks for the opportunity to comment on your drone rules.

The few people who do use drones in State Parks probably don't realize how negatively their fun affects the experiences of others who are hoping to see wildlife or just peace & quiet.

I think drone operations should be banned in state parks except for official park needs. I live at the coast where drones have been known to disrupt Black Oystercatchers. Wildlife should not take a backseat to drone operators in our parks.

Thank you for reading my opinion.

Bonnie Kuppler



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Ella Crow

**Date comment received:**

February 17, 2026 06:20 PM

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

**Public comment:**

I recently saw a manned ultralight aircraft flying low over Heceta Beach and the Siuslaw R. jetties, where a Snowy Owl had been spotted and photographed previously. So ultralights should also be restricted along with drones.

Thank you,

- Ella Crow, Springfield, OR - birding enthusiast and member of Birding Oregon.



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Sarah Jensen

**Date comment received:**

February 17, 2026 06:20 PM

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

**Public comment:**

I was enjoying my walk on the beach at Harris Park recently when I heard a buzzing sound and all of a sudden a drone was flying over my head. To be honest, as a resident, this was the first time I've experienced this and I was really taken aback. I felt like my privacy was being violated because I was being photographed without my permission and I had no idea who was operating the drone. I realize I was not the target of the person operating the drone, but it was very annoying and distracting from my surroundings. Please continue not allowing drones in our state parks and recreation areas where we go to avoid distractions and be in nature undisturbed.

Thank you,

Sarah Jensen  
Brookings



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Deborah Buitron

**Date comment received:**

February 17, 2026 06:21 PM

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

**Public comment:**

Dear OPRD,

Thank you for the opportunity to comment on your drone rules. We moved to Oregon in part because of the many fabulous State Parks, and we visit them frequently. We enjoy bird watching and beach combing, and simply enjoying being in nature, with the sounds and sights that are part of it. We have had peaceful walks disturbed by drones, making us feel as though we are being spied upon, and shattering the atmosphere.

Even worse, we were watching a large flock of feeding shorebirds, careful not to disturb them, when someone flew a drone above them, causing the whole flock to panic and leave the area. That is a serious disturbance when birds are preparing for their night roost. The people flying the drone had no idea they were disturbing the birds, Only a tiny portion of people visiting parks operate drones, but their noise and intrusion affect many park visitors, and also birds and other wildlife.

Drone take-offs and landings should be banned in state parks except for official park needs, or serious research. 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.

Restricting drones is especially important on the ocean shore and coast where they have been directly observed to disrupt Black Oystercatchers. Flying drones over western and Clark's grebe colonies on lakes could cause the entire colony to abandon their nests. Wildlife should not take a back seat to drone operators in our parks.

If drones are permitted at all, it should be only in tightly limited areas, and in only a small set 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,  
Deborah Buitron  
Gary Nuechterlein  
Emily Nuechterlein

Port Orford, OR



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Larry Basch

**Date comment received:**

February 17, 2026 06:21 PM

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

**Public comment:**

Dear OPRD,

Thanks for the opportunity to comment on your drone rules. Like most people I go to State 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, but their noise and intrusion affect many park visitors, and also birds.

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.

Restricting drones is especially important on the ocean shore and coast where they have been directly observed to disrupt Black Oystercatchers. 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 a new technology that has potential to have major impacts on park resources, including solitude, privacy, and wildlife habitat.

If drones are permitted at all, it should be only in tightly limited areas, and in only a small set 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,

Larry Basch  
Bandon, Oregon



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Christie Dunn

**Date comment received:**

February 17, 2026 06:22 PM

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

**Public comment:**

Dear OPRD,

Thanks for the opportunity to comment on your drone rules . I visit Oregon State Parks to enjoy the beauty Oregon's outdoors, with its natural sound..

It's my opinion that drones 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. Enforcment of drone abuse would be hard to manage with any partial use in our state parks. Park visitors and its wildlife to not benefit from drone present in our park. As more folks purchase drones there will be more conflicts between drone users and other park visitors.

Keep our Parks Drone Free.

Thank you

Christie Dunn



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Chris Barns

**Date comment received:**

February 17, 2026 06:22 PM

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

**Public comment:**

I am writing to address a serious error in the wording for the proposed rules regarding The Take-off and Landing of Drones in Oregon State Parks.

The idea is probably to maintain the peace and quiet of the Parks by prohibiting loud, buzzing, motorized drones. These usually have 4 or more small rotor blades, turning at a high RPM creating a loud buzzing sound. They are flown remotely, sometimes even beyond the sight of the operator or pilot.

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

Please amend the Rule by inserting the word "MOTORIZED" in the definition of "Drone" to solve this obvious problem!

I have been flying R/C sailplanes since 1970 in many state and local parks without any issues with people or wildlife, please keep it this way for my continues recreation and outdoor enjoyment.

Sincerely, Chris Barns, AMA 382115



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Linda Steinle

**Date comment received:**

February 17, 2026 06:23 PM

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

**Public comment:**

Dear OPRD, public, and decision-makers:

I've tried to think of a system or situation where drones in parks is a good idea. I can't think of how it can work, so I oppose the rule as now written. There should be rules about it, and I appreciate adoption of new rules that provide State Park managers with tools to actually regulate drone use in state parks. But, with narrow exceptions, drone usage should be strongly restricted in state parks. Among my more specific concerns:

1. If drone usage is allowed, even only under certain conditions, drones would be extremely time consuming and difficult to manage. State parks are chronically understaffed and underfunded, and staff can't add this significant new task. Given current park budget limitations, work on park upkeep, law enforcement, and species protection should get the budget considered for drone management.
2. Of the great values, among many, in state parks is the opportunity for privacy, and for peace and quiet, and for an undisturbed viewshed. With the prospect of intrusion by drones at any moment, these opportunities would be gone.
3. The same need for privacy and peace and quiet applies to birds and wildlife, and especially to nesting birds. 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. The education tasks and enforcement tasks already needed to protect these rare species are huge. There is no chance of consistently keeping drones out of restricted areas. Even finding the drone operator to enforce protection is quite challenging.
4. There are plenty of other places to operate drones, there's no need to allow them in state parks.

I recognize that drone operation can be fun, and photos taken from drones can be lovely and useful. However, those considerations can't rule out the values described above. One possible approach is to allow drone flights for rare, high value public purposes if the drone is operated by a professional who attends an orientation on the rules, and there is a revocable bond involved.

Thank you for considering my input.  
Linda Steinle  
Portland, Oregon



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Les Tumidaj

**Date comment received:**

February 17, 2026 06:23 PM

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

**Public comment:**

Comments RE OPRD draft drone regulations

(Our Parks are) jewels tasked with healing our wounds, delighting our senses, and connecting us with forces greater than ourselves. Without these values, our State Parks have no meaning.

Sam Boardman

Dear Ms. Gauthier,

Thank you for the opportunity to suggest improvements on the draft rules for drone usage in our State Parks and coastal areas. Over two years ago (!) I commented on draft criteria and sample takeoff/landing maps and am glad to see some incorporation of those comments in the draft rules. But I really thought this process would be further along, including the revision/improvement of the drone map criteria table to better account for traditional, natural, non-motorized public use of State Parks and coastal areas; the protection of critical wildlife habit

and activities; mapping of allowable takeoff sites consistent with current public recreation and wildlife protection; and enforcement of the rules ensuring accountability by drone users; education of all Park/Coast visitors, including drone operators, appropriate behavior toward other users and innocent wildlife; and a straightforward process for the public to report violations.

Overview comments:

I appreciate two significant improvements in the proposed rules:

- The following is a significant improvement from my last comments in 2022, “UAS operation is prohibited unless specifically designated.” This is a critical change to the rules that implicitly acknowledges Oregon’s priorities to safeguard Oregonians right to find enjoyment and refuge in the natural areas of our State Parks and coastal areas, and to protect wildlife, both native and migratory, for the enjoyment and enrichment of current and future generations. This is a good start but, as I’ll explain, there’ll be challenges in finding acceptable drone launch sites that don’t violate these priorities.
- The inclusion of western snowy plover nesting areas as a protected in the rules is a welcome addition. But, as I explain below, this provision falls far short of what State wildlife policy call for, resulting in a total absence of any of the other species who rely on the coastal and

interior state parks ecosystems. In addition, the rules do not account for the ecological needs and vulnerability of the life cycle of this wonderful bird and the other omitted species.

#### Personal Experience with our Parks

I first encountered Oregon's State Parks over 40 years – a visit to Honeyman SP cemented my love of this State. Since then, these Parks have been for us a source of play, recreation and wonder through all the ups and downs of our lives. In addition, as much as we love the scenery, it's the magic of wildlife that makes all that scenery come to life. As a result, we have spent much of our past five years volunteering, as EPA certified surveyors, with the Oregon Parks and other groups in support of our wildlife. These are the values that we feel obligated to protect and pass on to the next generations.

#### Experience with drones

I fully appreciate the advantages that drones have brought to scientific research and personal recreation, marvel at the new insights that wildlife biologists are deriving from their use, and thoroughly enjoy the fantastic imagery that (responsible) drone hobbyists have provide. But I have also experienced way too many cases of irresponsible behavior in state and national parks

and other public lands, both coastal and inland, including the harassment of wildlife (spooking birds, nest sites and deer); obnoxious intrusions on peoples' walks in nature; creepy, hovering drones spying on our activities, and intrusions onto Oregon's island National Wildlife Refuges. People have come to rightfully expect reasonable privacy and the quiet enjoyment of our protected natural areas, and that should be respected by OPRD planners.

#### Draft Rules:

- The draft rules, although thus improved, still do not adequately address the key values called for by Oregon legislation and expected by its citizens:

- o There is no explicit reference to preserving the values of traditional, natural park recreation. The sacred right to take a beach walk in a natural setting along our Oregon coastlines or State Parks without harassment by machines or other artificial intrusions. This has been the primary form of recreational experience in our State, especially along our coastlines, for 14,000 years or more. Families and their children, kite flyers, lovers of nature, lovers, people who are seeking healing for their wounds, and those seeking connection with forces greater than ourselves all want to pursue these deeply human activities without intrusion by mechanical vehicles.

- o Protection of our precious wildlife throughout their entire seasonal patterns and life cycles. People come to our State Parks and coastal areas for the scenery, but it's when they have that special encounter with wildlife that their hearts light up. My wife and I, and all our fellow Park volunteers, can attest to this magical experience, and that we want to pass on to future Oregonians. Making reference to designated Western Snowy Plover nesting areas is a welcome addition but does not adequately address nor protect Oregon's overall wildlife resources as I discuss in the following.

#### Wildlife protection

- Current State policies provide very strong protection for our native and migratory wildlife and their habitat areas, with such statements as: "prevent serious depletion of any indigenous species"; "maintain all species of wildlife at optimum levels"; "make decisions that affect wildlife resources of the state for the benefit of the wildlife resources"; "(may not) harass, disturb, pursue, injure or kill wildlife"; and so on. The proposed rules need to better reflect these policies as noted in the following.

- Federal and the State's wildlife policies are implemented through a variety of programs design to protect wildlife and their habitat, such as those below. The draft rules and

their implementation should be consistent with these policies and programs:

- o Oregon’s State Wildlife Action Plan provides strong guidance for maintaining healthy wildlife populations, preventing declines of at-risk species, and reversing declines in these resources. It explicitly addresses a number of species at risk requiring protection, such as western snowy plovers and black oystercatchers, as well as critical habitat areas well represented by the State Parks such as Rocky Habitat Management Areas, Marine Reserves, and Marine Protected areas. The draft rules should ensure that these areas are off-limits to drone takeoff sites.
- o Oregon’s near off-shore islands, islets, sea stacks and rocky coastline are the heart of seabird and shore bird nesting and deserve particular protection. Virtually all the island/islets are part of the Oregon Island National Wildlife System and need at least a half mile or more buffer from drone take-off sites; these world-renowned habitat areas are just too ecologically important to allow the possibility of any type of human disruption. This also applies to the rich population sea mammals who haul out on many of those island.
- o On-shore, Oregon’s rocky coastline is also key nesting habitat for an amazing variety of sea birds, such as common murre, pigeon guillemots, tufted puffins, black oystercatchers and other rock habitat birds. The oystercatchers, a real delight for visitors, are year-round residents that utilize the entire expanse of these rocky habitats for nesting, chick maturation, feeding, roosting and winter congregation. Launch prohibitions are appropriate for this entire, integrated ecosystem.
- o Pacific Shorebird Flyway. There is no recognition of the critical role that Oregon’s Parks play in supporting the endangered Pacific Flyway, especially for the millions of birds that migrate through Oregon’s coastal and interior areas. The entire expanse of Oregon’s beaches is essential for the migrating shorebirds who use for resting, feeding and roosting on their migrations spanning thousands of miles. These birds also provide magical, cherished experiences for coastal visitors. But, according to a study published in 2023, 26 of the 28 shorebird species were found to be declining during the past 40 years and, unfortunately, this trend is accelerating. Therefore, any State recreational policy should not be placing additional stress on these vulnerable birds, at least during the migration periods.
- o Western Snowy Plovers, as a threatened species, does get mention in the rules as far as designated habitat sites. But vulnerable life cycle of this wonderful bird goes beyond laying eggs, but also include fledging and a year-long maturation process for the young birds. These birds need to go beyond roped-off nesting areas for feeding, roosting and winter congregation. In addition, plovers don’t read signs and can and will nest beyond designated areas and designated buffers. Adaptive management needs to take this reality of wildlife behavior into account and allow for rapid responses in management designations
  - OPRD should aim to protect all birds and wildlife from harassment by drones in all stages of their lifecycle, and not just for nesting or only for state or federal protected species. It is inadequate to simply refer to existing protected species lists given the extreme stresses that Oregon’s wildlife, both native and migrating, are undergoing. Such lists are for species on the verge of extinction. Oregon’s State Wildlife Action Plan recognizes this limitation and the State’s obligation, under its own policies, by proposing actions for protecting species and habitat areas at risk. In support of these policies, OPRD should also prohibit drone use in the following two areas previously listed as “conditional” in the earlier drone map criteria:
    - o Areas where wildlife concentrate for migration, breeding, nesting, or wintering.

o Areas that contain critical habitat for state or federally protected species that are negatively affected by drones

#### UAS Operating Criteria, Maps and Public Involvement

I am concerned that at this late date, we have not seen any updated information on:

- Criteria for determining protected areas for wildlife and natural, non-motorized human recreation and allowable drone take off/landing areas. The criteria that I commented in 2023 possessed serious flaws and I would have expected some updates with improvements at this time. Otherwise, it's nearly impossible to evaluate these rules effectively without the criteria for governing them.

- Likewise updated sample drone takeoff maps that would illustrate how these rules and governing criteria would actually be applied have not been provided. Again, this makes it difficult to properly comment on the rules since their application is still a mystery.

- I would like to suggest the following steps:

- o Ensure there is plenty of time for the public to review and comment on any updated drone map classification criteria to ensure that properly reflect Oregon's land use, environmental and wildlife policies.

- o Engage in a measured testing program in low-risk areas to properly test out procedures and allow for public input. Perhaps at existing, inland State ORV areas, or along the coast, at the beach abutting USFS Sand Lake ORV area, since these areas are already subject to motorize recreation and accompanying impacts on non-motorize recreation and wildlife.

- o Allow adequate time for the public to respond any formal designation of UAS Operating Areas, not just during a short, 30 day period (except for de-listings in response to harmful outcomes). These maps will be of intense concern to communities/residents near those areas and recreational users, for whom that area may be of particular importance. It is important for OPRD to realize that, along with its local Park staff, these residents and frequent users are experts in the landscape, seasonal patterns, wildlife cycles, use challenges and special qualities of these Parks and sites. In other words, they know more than you do about these special places and need to have a say in any final designation.

#### Enforcement/Education

- Given the sheer volume of violations of current rules as observed by me and my wife over the past years, fellow Parks volunteers and users, and by the literature and press, the need for enforcement with resources to match is obvious. Unfortunately, current efforts by OPRD, US Fish & Wildlife, and US Forest Service staff, and Parks volunteers to post signs and civilly dissuade drone operators from violating rules have been helpful but not sufficient. Without a credible process for ensuring accountability and enforcement against violators, everyone's experience of the State Parks and coast will continue to degrade, wildlife will continue to be materially harmed, and the majority of those drone operators who are responsible in their recreation will also suffer, leading to public pressure to outright ban such usage.

- Also, resources are needed to ensure proper and effective education, management and enforcement of the drone rules. Unfortunately, the Legislature seemed to have authorized another unfunded mandate upon the backs of our hard working and dedicated Park personnel and rangers. We need a proposal for how all this activity will be properly funded without further straining OPRD's current fiscal challenges.

- OPRD should consider a permitting, registration and fee system for drone operators as follows:

- o A simple registration system for all drone operators to allow for education on proper drone operation, Park rules pertaining to wildlife protection and non-harassment of

other park users; and enhance accountability and enforcement of pertinent Park/Coast rules.

- o Provide adequate funds for program management and enforcement
- o Require onboard GPS tracking, especially for the under-regulated drones under 0.55 lbs. so that rules violators can be identified and deterred, and law-abiding operators are left to their enjoyment.

- In reviewing other commentators for this process, I came upon excellent comments by the Friends of Otter Rock (Dennis White, Feb 11, 2026) which goes into valuable detail about certification/permitting/registration, coordination with other agencies, education, certification fees, and GPS tracking for violations. I would strongly support OPRD pursuing these ideas because, without properly funded education, accountability and enforcement, this program will result in the dissatisfaction and resistance from the vast majority of Park/Coast visitors.

- With or without the above recommendation for permitting, tracking and enforcement, OPRD needs to setup a reporting/complaint system that is easy for public to use for the following reasons:

- o Rangers can't be everywhere, have more than enough to do, and have successfully relied on the support of the public.

- o It is sometimes dangerous for public to confront rogue drone users. Any a minimum it places the concerned, responsible public in a risky situation.

- o A web-site reporting site and 1-800 number, an accompanying data base tracking comments and problems would greatly aid timely and effective adaptive management.

- o Also, general user permitting with tracking capabilities would help immensely.

- o This can be funded with reasonable fees for drone users so that they pay their own way.

#### Public Involvement

Compared to my experience in 2022 with this process, public involvement seems to have improved this time around. Nonetheless, this type of process is still geared too much to favor well-funded, industry interest groups. Although public input seems much better this time, as evidence by the submittals I see posted, the reality is that the vast majority of Oregonians who love their beaches and delight in wildlife sightings have no idea this process is going on. Therefore, I am not surprised that when an average citizen does discover this process, they respond with a "no drones" response. All of them value their Oregon Parks and Coast with a fervent passion and see those places as their last refuge (like the birds) from the challenges of our current society and really do not want to see one of Oregon's greatest attributes harmed in any way. It is important that the Department carefully listen to these citizens so that the resulting rules are consistent with Oregon's enduring values.

#### Future trends: opening the can of worms

The rules current definition of UAS leave the OPRD wide open to escalating series of regulatory challenges. From personal experience, drone technology and usage trends are escalating at a rapid pace in terms of size, range, sophisticated imaging, synchronization, not to mention other forms of motorized recreation threatening our Parks. Also, drone abuses are also escalating in terms of crime, smuggling, vandalism, severe rogue usage, and even terrorist threats (the recent

El Paso fiasco is the tip of the iceberg of what's coming). Understand that future drones will be larger and noisier, and have better cameras, better internet connectivity to immediately post videos of users online (including minor children), greater range to travel outside the prescribed takeoff and landing areas, and allow for the synchronization of mass drone displays.

- At a minimum, rules should require all drones over 0.55 lbs in weight and subject to FAA

registration and onboard remote ID, be only allowed by special permit in any area on a case-by-case basis. The smaller drones, as suggested above, should be subject to a separate, simpler permit and tracking system.

- As a warning, the UAS proposal also sets an unfortunate precedent for other motorized aircraft, such as paramotors (manned, motorized paragliders), to also bully their way into our Parks. These types of users, from the personal experience of us Park volunteers, have already violated State Park and beach regulations, harassed wildlife, and even harassed some of us volunteers!

An example of the challenges of applying OPRD's proposed drone management scheme to real-world coastal wildlife habitats and recreation areas.

I continue to be skeptical that the OPRD's proposed approach could work effectively while preserving the primary values of natural recreation and wildlife preservation. A good example is

the string of state parks and beaches from Cape Meares SP to Oceanside wayside. This is an incredibly beautiful and wildlife rich area that would certainly attract any drone enthusiast. But the offshore is taken up with the heart of the Oregon Island National Wildlife Refuge including Three Arch Capes. All of these islands, islets and sea stacks are critical nesting habitat for murrelets, cormorants, pigeon guillemots, puffins and other threatened/endangered nesters. In addition, sea stacks and islets are immediately offshore, also part of the Refuge, and are key for murrelets and black oystercatcher nesting.

Black oystercatchers, which are on Oregon's wildlife list, use the entire complex of rocky habitat

areas and sea stacks/islets spanning from Oceanside to Short Beach to the entirety of Cape Meares including the north end year-round. As we volunteers have observed over the years, this entire area is critical oystercatcher habitat for nesting, year-round feeding along the rocky habitat, nurturing grounds for the immature birds (it's not just about nesting), and protective gathering areas for groups during non-breeding and winter seasons. I don't know where you could allow drone take off/landing areas that would not intrude on these dense wildlife areas. Oceanside area is itself immensely popular for families and school groups, especially during negative tides when the rich tidal zone is exposed to delighted visitors. The area is also a dense highway of sea and shore birds, flying in all directions. Drone use would be exceedingly dangerous throughout this constrained and busy area.

These same challenges can be found throughout Oregon Parks and coastal areas. The inconvenient truth is that virtually the entirety of the Oregon Coast is an integrated, year-round wildlife habitat that is vital to the threatened migrants of the Pacific Flyway and our

own native, coastal birds. These creatures, a dwindling population, simply have nowhere else to go; this is their last stand. On the other, we have the ability to adapt to their needs to ensure they continue to delight children in the future.

Thank you for the opportunity to comment on the draft rules.

Les Tumidaj



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Dani Dennenberg

**Date comment received:**

February 17, 2026 06:24 PM

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

**Public comment:**

Oregon Parks and Recreation Department,

As an Oregonian of 15 years and a wildlife rehabilitation volunteer, I urge you to strengthen rules around drone take-offs and landings within State parks and along the ocean shore.

Please especially include a strong “roll out” plan to help best protect nesting birds, marine mammals, and other wildlife from drone disturbances.

Over a million seabirds and shorebirds nest along Oregon’s coastline every year including the endangered Western Snowy Plover and at-risk species like the Tufted Puffin. A growing body of science indicates improper drone use is increasingly a cause of wildlife disturbances, leading to nest failures and other impacts contributing to wildlife population declines. Bird Alliance of Oregon’s Snowy Plover and Black Oystercatcher monitoring programs document many drone/wildlife disturbances every year on the coast. This will only increase if State Parks doesn’t have strong rules in place and a reasonable plan to roll out the new regulatory process.

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.

Sincerely,

Dani Denningenberg



# Submit a public comment on a rule

**Oregon Parks and Recreation Department**

**Commenter name (if provided):**

Mike Nehls

**Date comment received:**

February 17, 2026 06:24 PM

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

**Public comment:**

Please take this opportunity to restrict drone use along our coastline. We as a society owe it to the wildlife and also the dedication this state stands for with regards to conservation. Thank you



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Jack Spadaro

**Date comment received:**

February 17, 2026 06:25 PM

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

**Public comment:**

Dear OPRD, public, and decision-makers:

I've tried to think of a system or situation where drones in parks is a good idea. I can't think of how it can work, so I oppose the rule as now written. There should be rules about it, and I appreciate adoption of new rules that provide State Park managers with tools to actually regulate drone use in state parks. But, with narrow exceptions, drone usage should be strongly restricted in state parks. Among my more specific concerns:

1. If drone usage is allowed, even only under certain conditions, drones would be extremely time consuming and difficult to manage. State parks are chronically understaffed and underfunded, and staff can't add this significant new task. Given current park budget limitations, work on park upkeep, law enforcement, and species protection should get the budget considered for drone management.
2. Of the great values, among many, in state parks is the opportunity for privacy, and for peace and quiet, and for an undisturbed viewshed. With the prospect of intrusion by drones at any moment, these opportunities would be gone.
3. The same need for privacy and peace and quiet applies to birds and wildlife, and especially to nesting birds. 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. The education tasks and enforcement tasks already needed to protect these rare species are huge. There is no chance of consistently keeping drones out of restricted areas. Even finding the drone operator to enforce protection is quite challenging.
4. There are plenty of other places to operate drones, there's no need to allow them in state parks.

I recognize that drone operation can be fun, and photos taken from drones can be lovely and useful. However, those considerations can't rule out the values described above. One possible approach is to allow drone flights for rare, high value public purposes if the drone is operated by a professional who attends an orientation on the rules, and there is a revocable bond involved.

Thank you for considering my input.

Jack Spadaro



# Submit a public comment on a rule

## Oregon Parks and Recreation Department

**Commenter name (if provided):**

Hava Dennenberg

**Date comment received:**

February 17, 2026 06:26 PM

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

**Public comment:**

As someone who frequents places in nature and as someone who has seen DIRECTLY the disturbance that drones cause to our natural habitats, I STRONGLY URGE OPRD to strengthen drone rules and include a strong “roll out” plan to help best protect nesting birds, marine mammals, and other wildlife from drone disturbances. Anything short of this is UNACCEPTABLE. Our wildlife are ALREADY in profound peril. We do not need to be doing anything else that is going to add to this distress and lead to more deaths with populations already in steep decline (many moving toward EXTINCTION).

Over **a million** seabirds and shorebirds nest along Oregon’s coastline every year including the endangered Western Snowy Plover and at-risk species like the Tufted Puffin. **A growing body of science indicates improper drone use is increasingly a cause of wildlife disturbances, leading to nest failures and other impacts contributing to wildlife population declines.** Bird Alliance of Oregon’s Snowy Plover and Black Oystercatcher monitoring programs document many drone/wildlife disturbances every year on the coast.

These drone behaviors will only increase if State Parks does not have strong rules in place and a reasonable plan to roll out the new regulatory process.

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.

In 2021 the Oregon legislature directed OPRD to develop rules for drones. The agency pulled together a workgroup (including Bird Alliance of Oregon) to develop [criteria](#) where drone use should be prohibited (red zones), allowed conditionally (yellow zones) and allowed all the time (green zones).

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

I would also URGE OPRD to make the following changes and additions to its plan:

A) 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.

B) 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.

C) 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.**

**D) 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.

For the Animals and Fragile Ecosystems,

Hava Dennenberg