



## City of Portland

Portland Parks &  
Recreation  
1120 SW 5th Ave. # 800  
Portland, OR, 97204

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# Portland Parks & Recreation Park Ranger Program

## Comment Summary on Proposed Rulemaking

May 21, 2025

Re: Dog Off-Leash Area Rules (PRK-1.22)  
Motorized Wheeled Devices (PRK-1.23)  
Metal-Detecting In Parks (PRK-1.25)  
Rescinding Outdated Park Rules (PRK-1.05; PRK-1.12; PRK-1.16; PRK-5.01; PRK-3.09)

### COMMENT PERIOD

The comment period was open March 25, 2025 to April 30, 2025 at 5:00 p.m.

### NEXT STEPS

The Bureau received 22 comments. The most significant comments were related to the metal detecting rule, PRK-1.25 (18 comments). Due to the comments received, some sections of the metal detecting rule were clarified, and terms were updated to reflect best practices related to metal detecting.

**Therefore, pursuant to City Code 1.05, the City Administrator will take the following actions:**

1. PRK-1.05; PRK-1.12; PRK-1.16; PRK-5.01; PRK-3.09 (Outdated Park Rules) will be RECINDED effective May 30, 2025 and be effective the same date.
2. PRK-1.24 (Motorized Wheeled Devices) will be ADOPTED on May 30, 2025 and become effective June 29, 2025.
3. PRK-1.22 (Dog Off-Leash Area) will be ADOPTED on May 30, 2025 and become effective June 29, 2025.
4. PRK-1.25 (Metal Detecting In Parks) will be ADOPTED AS AMENDED. The amended version is attached as Attachment B. The AMENDED VERSION will be ADOPTED on May 30, 2025 and become effective June 29, 2025.

### SUMMARY

A summary and response to comments is below in Attachment A.

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## Attachment A.

Comment	Response
<b>Metal Detecting Rule</b>	
Allow metal detecting in Delta Park, Cully Park, Cathedral Park, South Waterfront Greenway, Tanner Springs Park, The Fields Park, and Willamette Park	<i>Updated rule to remove restriction on metal detecting in Delta Park, Tanner Springs, The Fields, and Willamette Park. The other parks remain on the list due to long-term remediation activities being performed under a DEQ permit at these sites.</i>
Allow metal detecting in swimming beaches, playgrounds, within 3 feet of paved or soft-surface trails, and dog off-leash areas.	<i>Updated rule to remove restriction on metal detecting at swimming beaches, playgrounds, and within 3 feet of soft-surface and paved trails due to the low risk for damage. Restrictions will remain for dog off-leash areas to reduce user conflicts.</i>
Replace the word "probing" with "plug removal method" instead and update the methodology generally.	<i>Updated rule to reflect the definition of "plug removal method" and added new language to best practices.</i>
Allow T-Handle shovels and define blade allowance and depths.	<i>Updated to reflect that a t-handle style of shovel could be used and updated depths and widths of blades.</i>
Update "detectors" to "detectorists" to reflect standard terminology.	<i>Updated.</i>

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Multiple comments with a request to reconsider metal-detecting rules to be less restrictive.	<i>Noted. Changes have been made that seeks to balance visitor experience, resource protection, and the recreational activity of metal-detecting.</i>
Add Hoyt Arboretum as a location where metal detecting is not allowed.	<i>The restriction on metal-detecting in tree groves and near tree roots seeks to address concerns related to tree protection.</i>
Change definitions around depth you may probe to more accurately reflect current methods	<i>Added a clear definition of the plug method and acceptable hole dimensions.</i>
<b>Dog Off-Leash Rule</b>	
Request for more dog off-leash patrols	<i>Noted.</i>
Allow larger dogs to use a designated "small dog" area when it is not in use by others.	<i>This was considered but was not adopted due to the potential for user conflicts.</i>
Implement time limits in dog off-leash areas to allow more users.	<i>Not adopted due to limited ability to enforce or manage such an arrangement.</i>
Provide greater consequences if a dog injures a person.	<i>Though not explicitly included in the rule, Rangers can also issue exclusions for violation of park rules or state law.</i>
<b>Motorized Wheeled Devices</b>	
Do not allow e-scooters on walking paths.	<i>Noted.</i>

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**ADMINISTRATIVE RULE NAME:**

**PRK-1.25 Recreational Metal Detecting in Parks  
[Proposed]-[AMENDED VERSION 1.2]**

**POLICY CATEGORY:** Park Use

**POLICY NUMBER:** PRK-1.25

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**Authorized By:** Sonia Schmanski  
Deputy City Administrator for Vibrant Communities

**Authority:** Portland City Charter 2-406(I) (2025); Portland City Code Chapter 1.05; and Portland City Code Chapter 20.04.040; delegated by City Administrator to the DCA for Vibrant Communities

**Date Adopted:**

Adopted by the City Administrator, as delegated to the Service Area:

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Deputy City Administrator  
Sonia Schmanski

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Date

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## **1. Purpose**

Portland Parks and Recreation allows recreational metal detecting as an activity to promote the exploration of our parks. Metal detecting is a low surface impact activity involving probing small holes and occasionally removing found items like rock samples, minerals, nuggets, coins, jewelry, and incidental metal items having no historical value.

Unregulated use of metal detectors on park property creates tripping hazards, damages vegetation, and can become unsightly. By establishing clear prohibitions and standards for metal detecting, this policy is intended to ensure all park users, including metal detector operators, have ample recreational opportunities while mitigating the adverse impacts on other park uses, operations, and maintenance.

This policy does not cover the use of metal detecting as part of prospecting or searching for historic or prehistoric artifacts for commercial, personal, or research purposes. Those uses require a Non-Park Use Permit (NPUP) issued by Portland Parks & Recreation. More information on NPUP permits is available at <https://www.portland.gov/parks/non-park-use-permits>.

## 2. Rules

The City Administrator hereby implements the following policy regulating the use of metal detectors and probing in parks:

### A. Locations where you can and cannot metal detect

1. Metal detecting is allowed in all developed parks, except in:
  - (a) Parks with a name that includes “Natural Area”, “Wetlands”, “Wildlife Refuge” or “Nature Area”
  - (b) Cully Park
  - (c) Beggars Tick
  - (d) Cathedral Park
  - (e) South Waterfront Greenway
  - (f) Tanner Springs Park
  - (g) The Fields Park
  - (h) Willamette Park
  - (i) Planting beds and gardens
  - (j) Community Gardens
  - (k) Areas in parks closed to the public, including areas marked by sign to “stay on trail” or out of wetlands or other sensitive habitats
  - (l) PP&R managed golf courses
  - (m) Specialty gardens (e.g. Rose Gardens, Memory Gardens, Leach Botanical Garden)
  - (n) Designated sports fields, stadium fields, sport courts, and synthetic turf
  - (o) Dog off-leash areas
  - (p) Within two (2) feet of any visible surface roots
  - (q) Tree groves, as defined by City Code Title 11.
2. Any other place marked by a sign prohibiting metal detecting.

## **B. How to metal detect in parks**

1. Only the plug removal method is allowed. The plug removal method is achieved by slicing the turf in a half-circle no greater than 6 inches in diameter and no deeper than 6 inches to hinge open the turf bed.
2. Probing for items is limited to manual, non-powered tools.
3. Acceptable tools include a T-Handle shovel, a hand trowel, small pick, screwdriver, or a small knife with a blade no larger than 6 inches in diameter and 6 inches in depth
4. Do not use larger digging tools such as shovels, mattocks, or auger bits.

## **C. Care**

1. Minimize unnecessary soil disturbances and do not create a larger or deeper surface disturbance than reasonable or necessary.
  2. Be aware that Parks keeps some metal equipment underground. Avoid damaging this equipment while probing.
  3. Do not probe or cut around sprinkler heads.
- Check the area desired for probing or cutting to avoid hitting any irrigation system, tree roots, or utilities that may lay close to the surface, such as sprinkler heads or valves, or conduit.

## **D. Restoration required**

1. All probed holes and plugs must be filled to return the surface to as close to pre-removal conditions as possible and to ground surface level.
2. Do not cut, remove, or dig up vegetation or trees, including roots.
3. All persons must protect the integrity of lawn turf, avoid diminishing the aesthetic quality or natural health of the surface being disturbed, avoid creating hazards for other park users, and avoid interference with other park activities.

## **E. Historic and cultural artifacts**

1. All federal, state and local laws pertaining to protecting and preserving antiquity, archeological, historic and cultural sites must be obeyed. These include but are not limited to the Antiquities Act of 1906 and the Archeological Resources Protection Act of 1979.
2. If you find an item of possible historic or cultural significance, bones of any kind, or potentially hazardous waste, leave the item where you found it and contact Park Rangers.
3. All articles found in parks having a value of over \$250 should follow state laws on found property.

## **F. Interference with permitted events, maintenance**

1. Metal detecting is not permitted in areas where permitted events are occurring, or where maintenance activity is underway.

## **G. Personal use only**

1. Metal detecting is allowed for personal recreational use only. Metal detectorists must be aware of and comply with Portland City Code Chapter 20.12, including but not limited to:
  - (a) [20.12.020 Soliciting For or Conducting Business](#) - No person shall solicit for or conduct business involving metal detecting without a permit.
  - (b) [20.12.100 Vandalism; Protection of Park Property](#) - Cutting of vegetation at a digging site, wading into fountains, failing to fill in a hole, or otherwise damaging Park property while metal detecting is prohibited. Be aware that Parks may have metal equipment underground that could be damaged by probing.

## **Related Policies, Procedures & Forms**

[PRK 1.18 Geocaching in Portland Parks](#)