Data Submitted (UTC 11): 6/14/2021 10:59:52 PM
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Comments: For the following reasons, I'm opposed to the US Forest Service proposal:

1. The current Oregon Dunes Plan ("Management Plan" developed in 1972 and then enacted in 1997 by congress) states (Chapter III - pg. 7):

Noise:
? Stricter ORV noise emission goals of 95 decibels in 1997 and 90 decibels in 1999 are established. Use 36 CFR, 261 Subpart B orders and/or seek an Oregon Administrative Rule to enforce these standards.
? A noise-control buffer featuring limited ORV access is established along the Cleawox-Woahink lake section of the NRA boundary (MA 10L). This buffer may be narrowed or eliminated if monitoring indicates noise emission goals are being met (95% of vehicles operating at 95 decibels by 1997). It may be expanded or re-established if monitoring indicates noise goals are not being met or if noise concerns persist.
? Quiet hours of 10 p.m. to 6 a.m. are established in all NRA campgrounds, except Horsfall and Spinreel where quiet hours are from midnight to 6 a.m.
? Night-riding curfews of 10 p.m. to 6 a.m. in the South Jetty to Siltcoos area and midnight to 6 a.m. in the Tenmile to Horsfall area are established.
? Several ORV facilities previously available for 24-hour use are now day-use only (Horsfall, South Jetty, and Goosepasture staging). Bull Run,
Hauser and additional Driftwood staging will also be day-use facilities upon completion.

Note that the Management Plan that the USFS is supposed to be following calls for a DECREASE in the decibel limit to 90 and NOT an INCREASE to 97 as being proposed.

2. Noise issues in the Dunes have been escalating every year since adoption of the Oregon Dunes Plan (1994). Not decreasing, as the Management Plan was intended.

3. Although the proposal is an INCREASE in the decibel limit, it does standardize the decibel limit across all vehicles. But still - I'm confused. Why INCREASE the limit to enforce? Makes no sense. It's like changing the 55 MPH speed limit to 120 MPH, because cars can now go 120 MPH.

4. How does the limit further enforcement? The issue is not the sound limit; the issue is enforcing the limits that are already in place.

5. How will this be coordinated with Coos County Commissioners proposed ordinance of 97 dB for Coos county when the dunes area encompasses more than just Coos County? Areas of the ODNRA also reside in Douglas and Lane county. (Coos County Commissioners have proposed and are having "hearings" on implementing an ordinance to limit off-road vehicles to 97 dB in Coos County's portion of the ODNRA).

6. The decibel limit is on a per vehicle basis and does not consider the "compound" effect of multiple vehicles or staged events. Noise studies have shown that the overall decibel level can greatly increase as the number of offenders increases.

7. The proposal only infers enforcement; it doesn't include added resources, means or processes for ticketing violators of the proposal.

For the benefit of all, I think the USFS should enforce the decibel limits enacted in the Dunes Management Plan.