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*Preserving natural habitats, watershed resources, and trails*

**ATTN:** Robert Eittleman, OHV Coordinator  
Los Angeles County Dept. of Parks and Recreation

**DATE:** October 28, 2009

**RE:** Draft OHV Guidelines

The board of the Antelope Valley Conservancy has resolved to submit these concerns regarding the Draft Off-Highway Vehicle (OHV) Guidelines for Los Angeles County:

- (1) It is stated that the locations chosen for public meetings have the highest concentrations of OHV ownership, and are likely areas for new OHV parks. We question the methodology of the Baseline Assessment of OHV ownership, based on zip codes rather than per capita ownership, which do not subtract agricultural registrations that are not recreational OHV. This is important as the statistics are being used to justify a need for new OHV facilities in these areas.
- (2) In the Guidelines, a facility as small as 100 acres qualifies as a "regional OHV facility", despite the claim that a regional OHV facility would have a large percentage of natural habitat, and its focus would be on long-distance trail riding. This appears unrealistic.
- (3) The Guidelines encourage OHV "in less developed areas" without addressing realistic safety concerns about increased illegal OHV use of multi-use trails, the lack of enforcement resources, and resultant environmental and community impacts. In most rural communities in the north County, OHV use of historic non-motorized trails already creates noise and conflict with landowners and trail users. It damages trails as well as plant and animal habitats. Over 60% Sheriff's OHV citations in these desert and mountain communities are issued to OHVs with Los Angeles area registrations. The Guidelines do not show how enforcement resources can manage increased OHV activities.

The Guidelines draft talks about environmental sensitivity but must incorporate environmental ethics, methods and practices. If OHV recreation is to be expanded by Los Angeles County, the Guidelines should clearly show how externalities will be borne by providers and users, not by communities and nature.

- (4) Providing sufficient area to allow for adaptive road/trail management (i.e., closure of certain trails or roads to encourage healthy recovery of trail portions to reduce soil erosion, etc.).
- (5) Trail closure and maintenance plans to reduce or minimize long-term use impacts.
- (6) Vegetation management to reduce unintended secondary impacts in the forms of erosion, weedy species proliferation and altered fire regimes.

(7) Your comments address the limitations associated with restricted areas. Within our project area, unauthorized use and illegal access of non-trail areas continues to be a problem despite education programs, physical barriers, and signage.

Thank you for your consideration,

A handwritten signature in blue ink that reads "Elaine Macdonald". The signature is written in a cursive, flowing style.

Elaine Macdonald  
Director