

To: California Air Quality Board

From: San Diego Ultra Running Friends, Inc., a California nonprofit organization

Re: Hearing on December 9, 2021 on SORE regulations

Date: October 15, 2021

Dear Sir or Madam,

I am writing to you on behalf of San Diego Ultra Running Friends, Inc. ("SURF"), a California nonprofit corporation that is tax-exempt under Section 501(c)(3) of the Internal Revenue Code (and the equivalent California statute). For more than 15 years, SURF has conducted a trail maintenance program in the mountains of San Diego County. For more about the history of our program, known as TrailFit, please visit www.sdtrailfit.org or SDTrailFit on Facebook. The trails we maintain are located 30-50 miles from central San Diego in a sparsely populated area. These trails include about 40 miles of the Pacific Crest Trail, a National Scenic Trail.

Each year, we clear brush, remove downed trees and do tread repair on approximately 25 miles of trail. We also do other projects, as requested by the agencies we work with, such as trail building/reroutes, graffiti removal and installation of trail signage. We work primarily in partnership with the California State Park system and the Descanso District of the Cleveland National Forest. I personally have led the TrailFit program from its inception and in a typical year I spend over 100 days out on the trail leading crews, scouting trail, etc.

At this time, there are no employees within the Descanso District of Cleveland National Forest who are tasked with trail maintenance within the district. Nearly 100% of such work is being performed by volunteers working with SURF and the San Diego Mountain Bike Association. Anza Borrego State Park and Cuyamaca Rancho State Park (with hundreds of miles of trails) have only two employees assigned for trail work and thus both parks rely heavily on volunteers from SURF and other nonprofits.

Virtually all of our volunteers are current or former ultra runners (runners who run in races for distances longer than a marathon) and thus they have a high level of fitness far beyond that of a typical volunteer. This enables our group to maintain trails that are farther removed from trailheads and other access points. Because ultra running races tend to use many of our local mountain trails, our members are motivated to work on these more remote trails (whereas most other volunteers in the San Diego area are unwilling to drive an hour each way to a trail work location let alone hike several miles each way to the work area). It would not be unusual for our crews to hike 3 or 4 miles to the work location, clear trails for half a day and then hike back out. We note that State Park employees, who also use SORE, are usually working on the trail for a full 10 hour workday.

Generally speaking, we have no fundamental objection to replacing SORE with ZEE in an urban setting. Heck, who doesn't hate a noisy leaf blower? But, making such a replacement in the context of trail maintenance raises many insurmountable problems.

In our work we make considerable use of SORE, primarily chainsaws, brush cutters (aka brush saws), hedgers and pole saws. The agencies we work with require that when operating any of these types of power equipment, we must wear safety items including Kevlar chaps, a sawyer helmet, ear protection,

and eye protection (which requirements would also apply to ZEE). We also carry a first aid kit and during certain fire conditions, a small fire extinguisher. This is all in addition to one's personal gear: backpack, lunch, water, hat, sunblock, cell phone, jacket, work gloves, etc. So, before we even set one foot on the trail, our crews are already carrying substantial amounts of weight.

A typical crew would consist of 4-8 individuals, with one or two persons operating a brush cutter, another running a hedger, and the rest of the crew doing either tread repair/improvement or stashing the brush cuttings. The crew members not operating power equipment will be carrying various hand tools, such as loppers, Pulaskis, McLeods and pitchforks. During a typical half day of trail work (excluding driving time), we will clear between .5 and .75 miles of trail. Even our volunteers are pretty much wiped out after 4-5 hours of lifting, digging, hauling, lopping, etc.

In general, the battery life ZEE such as chainsaws, brush cutters and hedgers, when running at full power is in the range of 15-30 minutes. With SORE, we are normally running our equipment at full power on a more or less continuous basis and we would need dozens of backup batteries to get thru a typical project. For some projects, such as sawing up a big downed oak tree that has a 4 foot diameter, or brushing out a 15 foot high wall of ceanothus brush, I am not aware of any ZEE that would have the capability of doing that. It simply is not realistic to expect trail workers, unpaid volunteers or paid agency employees, to lug in heavy amounts of back up batteries needed for ZEE operations on top of everything else that is required to do a project.

Over the years, SURF has invested several thousand dollars in trail maintenance equipment, including SORE. Under AB 1346 we understand that the State of California is proposing some financial assistance for landscape companies to replace SORE with ZEE but we are not aware of any similar assistance for groups such as ours. We are a tiny non-profit with less than 300 members and it would be financially impossible for us to replace all of our SORE with ZEE.

Based on my experience, I believe that for trail maintenance, the use of ZEE in replacement of SORE is only feasible where (1) the parking area/trailhead is very close to the trail, (2) the total distance for the project itself, including hiking from the trailhead, is under one mile, and (3) the work to be accomplished involves relatively small brush and trees. Unfortunately, almost none of our projects fall within these criteria. Indeed, a project that fit these criteria could probably be best handled by a crew of typical non-ultra runner volunteers using only hand tools.

Thus, we respectfully request that any regulations adopted to replace SORE with ZEE exempt SORE that will be used to build, maintain, repair or improve trails (and associated areas such as trailheads, parking, information centers, and visitor centers) used by hikers, equestrians and mountain bikers. Perhaps one day, improvements battery technology will lead to the development of ZEE that is truly the equivalent of SORE in weight, power, and running time, but that day has not yet arrived.

Thank you for your time and consideration. If you have any questions, please feel free to contact me anytime.

Kenneth E. Bonus
Trail Crew Leader, TrailFit
San Diego Ultra Running Friends
El Cajon, California
619.301.0780