

Coalition for Claremont

Fire Safety First
Citizens for Passive Recreation

HAND DELIVERED
4/2/25

April 2, 2025
Via Certified Mail

Corey Calaycay, Mayor
City of Claremont
207 Harvard Avenue
Claremont, CA 91711

RE: NEXT
CITY
COUNCIL
MEETING

Dear Mayor Calaycay:

The Coalition for Claremont is a coalition of nonprofit associations established in the public interest to maintain and improve the quality of life in Claremont, California 91711. The Coalition for Claremont ("C4C") is very concerned about the ordinance related to recreational activities in the Claremont Hills Wilderness Park that passed a first reading at your meeting of March 25 (agenda item 11). For reasons including but not limited to those discussed below, the ordinance as passed at first reading is fatally flawed. C4C respectfully requests that the ordinance **not** be placed on the consent calendar, and that it be carefully reconsidered with public input and full compliance with the California Environmental Quality Act ("CEQA").

Fire Safety First ("FSF"), a member group of C4C, is a nonprofit association of citizens residing in Claremont and surrounding communities that seeks to promote fire safety and awareness for the public benefit. Citizens for Passive Recreation ("CPR"), a member group of C4C, is a nonprofit association dedicated to educating public officials and the public-at-large about issues affecting citizens who enjoy passive recreation, including but not limited to walking, hiking, jogging, running, wildlife viewing, birdwatching, nature study, and nature photography.

As an initial matter, C4C is disturbed by the way that the first reading was conducted on March 25, 2025. It should be obvious to any honest and objective observer, by background facts and statements made at the hearing, that Councilmember Stark has a keen personal interest in the outcome of the proposed ordinance. She could and should have properly recused herself from the agenda item. Instead, we watched in silent dismay as—after the close of public comments, when members of the public had no opportunity to rebut—she systematically groomed and persuaded the other council members with numerous leading and misleading statements in order to achieve her desired outcome: a vote by the council to allow motorized bicycles ("e-bikes"), which she owns and uses in the park, including the approval of an unlimited number of a class of e-bikes (Class 2) that was **not** supported by public comments, **not** recommended by the City's Community and Human Services Commission ("Commission"), and **not** recommended by the City's staff.

In brief, if the ordinance as passed at first reading is adopted, the CHWP would become one of the only—if not the only—low-elevation, extremely fire-prone, shrub-dominated, wildland-urban interface areas in the region to allow the unlimited use of these dangerous machines.

As a matter of course, the City Council has the authority to disregard public comments and to overrule its own Commission and staff, and to adopt whatever considered ordinance it so chooses (if the action otherwise complies with CEQA and other laws). C4C does not dispute that authority. Our objection is that the Council was swayed by a biased, self-interested councilmember to adopt an arbitrary and capricious decision, expected by no one, that was shaped after the close of public comments when the public had no opportunity to “fact check” or rebut that councilmember’s several leading and misleading statements.

The criteria for recusal are not necessarily limited to financial interests. Recusal may be appropriate whenever a keen personal interest or bias could cause a reasonable person to question or doubt the impartiality of a public official. Clearly, it would be appropriate for Councilmember Stark to recuse herself from consideration of this ordinance.

Specifically, Councilmember Stark stated that she uses an e-bike in the park, and she made clear that she has a deep personal interest in allowing more e-bikes in the park. She opined repeatedly that Class 2 e-bikes should be allowed because they are essentially indistinguishable from other bikes. (That assertion is false. Class 2 e-bikes have a throttle that allows the rider to power forward without pedaling. Rangers can easily observe the throttle and easily observe that a rider is not pedaling.) She further implied (without evidence) that e-bikes necessarily need access to the CHWP simply because some riders have commented on the Internet that they want more access to *other* areas, and she implied (without evidence) that surrounding county governments still prohibit e-bikes on wildland trails simply because they haven’t gotten around to allowing them.

She further misled the Council regarding the feasibility of an important mitigation measure proposed by staff. After the close of public comments she surprised essentially everyone in the room by asking the Council to eliminate a proposed mitigation measure that would have required equestrians to remove their animal’s manure from park trails (as is required of all dog owners). She implied that it’s somehow just not feasible for horse riders to do so. Had the public been allowed to rebut, we could have informed her (and the rest of the Council) that “manure catchers” are readily available and worn by horses at parades and other popular parks and beaches.

Remedy: The obvious remedy is for the Council to reconsider the ordinance, in its entirety, and for Councilmember Stark to recuse herself from consideration of this item.

Fire Risk

E-bikes rely on large lithium-ion batteries that are known to spontaneously combust and explode. Allowing them in the CHWP creates a recipe for disaster. It would be arbitrary and capricious to adopt the proposed ordinance without full consideration of the fire risks. The City, as Lead Agency under CEQA, has failed to adequately analyze, disclose or mitigate the potential catastrophic effects of this ordinance on human lives, property and the environment. Specifically, the action to affirmatively allow and invite unlimited numbers of Class 1 and Class 2 e-bikes to use the CHWP (especially with no established temporal controls or other mitigation measures to reduce fire risk) poses the potential to result in catastrophic wildland-urban wildfires that could result in multiple fatalities, untold millions of dollars in property damage, long-lasting harm to vegetation communities and wildlife habitat, reasonably foreseeable future flooding and debris flows, and other significant adverse impacts.

The proposed ordinance also would likely result in higher fire insurance premiums for homeowners near the CHWP, once their insurance carriers realize the risk that the City of Claremont has created by affirmatively allowing essentially unlimited e-bike use in the CHWP.

Most e-bike fires and explosions occur during charging. But spontaneous e-bike fires and explosions do occur, largely due to "thermal runaway," which results from a short circuit that occurs due to a manufacturing defect, damage, or misuse. Thermal runaway releases heat which leads to a chemical reaction that generates more heat, causing the cell to collapse, which leads to more heat. This chain reaction can result in a fire that is extremely difficult to extinguish, and/or an explosion.

One recent incident occurred where an Orange County Fire Authority Division Chief responded to a call involving an e-bike whose battery randomly exploded during a ride on a trail in nearby Irvine, California:

"The rider experienced the battery starting to warm and heat so he exited the bike and shortly thereafter the battery ignited in a fire, sending projectiles up to 40 feet from the bike," he said. "And it was very challenging to extinguish." (see Exhibit A)

Because mandatory standards do not yet exist for e-bike batteries, poorly made batteries have flooded the U.S. market, increasing the risk of fires. Neither the U.S. Consumer Product Safety Commission nor the California State Fire Marshal have yet promulgated mandatory safety standards for e-bike batteries, and even if they do, all of the existing e-bikes will still be on the road. There is currently no program anywhere to confiscate cheap, poorly manufactured imported e-bike batteries. The e-bike market in the U.S. is best described as being still in the "wild west" phase, where essentially anything goes.

Remedy: The Council should, at bare minimum, prepare an environmental impact report (EIR) to analyze and disclose the environmental consequences of the proposed action to affirmatively allow unlimited numbers of Class 1 and Class 2 e-bikes in the highly flammable and fire-prone CHWP. Any such EIR should begin with an alternative that prohibits all e-bikes in the CHWP to eliminate the risk of catastrophic wildfires caused by e-bike batteries.

Our members with professional expertise at wildland fire management and firefighting recommend the following additional alternatives and mitigation measures that could be evaluated and considered if the Council desires to proceed with any plan to affirmatively permit e-bikes in the CHWP:

1. Allow e-bikes (including as OPDMDs) in the CHWP only when the grasses are green and fire danger is LOW. In other words, when grasses are brown or fire danger is MODERATE or higher, prohibit all e-bikes;
2. Unless and until the California State Fire Marshal promulgates safety standards for e-bike batteries, allow only e-bikes (including as OPDMDs) with UL-certified batteries;
3. After the California State Fire Marshal promulgates safety standards for e-bike batteries, allow only e-bikes (including as OPDMDs) that meet the CA standards.
4. Manual bikes also pose unique fire risks. Bike pedals striking rocks can cause sparks that ignite dry grasses, causing wildland fires (*see* Exhibit B). Therefore, ALL bikes should be prohibited when fire danger is HIGH, VERY HIGH, or EXTREME.

Please reconsider the ordinance as discussed above to reduce the risk of an avoidable catastrophic wildfire that could devastate our community.

Passive Recreation

Please take a minute to slow down from your busy day, and consider this example:

A family of three, a young mother and father with a 4-year old daughter, are walking in the CHWP. The mom and dad are NOT allowed to walk with their child between them, because it is now a CRIME to walk more than "two abreast," (ostensibly to leave plenty of room for cyclists to speed around the park without having to slow down for pesky pedestrians. If a fast-moving bike hits them, the rider could successfully argue that the family is at fault because they were walking three abreast, in violation of the City's ordinance. And after being struck by the bike, the family could in fact now be held liable for any damage to the rider or his/her bike.) Suddenly, a fast-moving bike approaches from behind. The rider yells "ON YOUR LEFT!!" and as he speeds by, he yells again "THERE'S THREE MORE." Then another bike approaches from

behind, and the rider yells "ON YOUR LEFT!!" and as he speeds by, he yells again "THERE'S TWO MORE." Moments later, a third bike approaches from behind, and the rider yells "COMING THROUGH!!" and as he passes, he yells again "THERE'S ONE MORE." Finally, a fourth bike approaches, and the rider yells "ON YOUR LEFT!!" and passes by, leaving our young family standing in a cloud of dust that lingers in the air long after the group of bikers has passed.

So our young family has now been yelled at *seven times* in just the last minute or so. But it doesn't end here. That was just one group of bikers. This scene repeats several more times during the duration of their short walk.

Hundreds if not thousands of visitors to the CHWP are having their quiet, contemplative walk/hike shattered by the impacts of fast-moving bikes on their passive recreation experience. And the substantial degradation of passive recreation experiences in the CHWP due to bikes will only INCREASE if the City adopts an ordinance affirmatively allowing unlimited numbers of Class 1 and Class 2 e-bikes. The word will get out that it's ok to e-bike in the park, businesses will open to rent e-bikes to park visitors, and e-bikers will flock to the park from surrounding communities.

During the first reading of the ordinance, one councilmember asked staff some very perceptive questions: Might we reduce the impacts of bikes on pedestrians by allowing bikes only on some trails? Or only at some times? The staff provided reasons why it felt that those two alternatives were not preferable. BUT HERE IS OUR MOST IMPORTANT POINT: Nobody asked for those two alternatives. **The alternative that the public has requested, but has NOT yet been discussed and considered by the City Council, is to prohibit all bikes for three or four days per week, to allow days of calm and quiet where pedestrians can enjoy a passive recreation experience in the CHWP without speeding bikes, without being constantly yelled at, and without having to choke on dust.**

We hereby suggest that all bikes be prohibited in the CHWP on Tuesdays, Thursdays and Sundays. The park would still be open to bikes on the MAJORITY of days, but pedestrians would have three days per week to enjoy the park without the many significant impacts of bikes. Bike owners could still visit the park on those days; just their bike would have to stay home. Such a rule would be relatively easy for everyone to understand, and it would be easy to enforce. It would help to mitigate both the current impacts of bikes, and the impacts of increasing numbers of bikes due to any decision to affirmatively allow unlimited numbers of e-bikes, because pedestrians would at least have a few days per week to escape the current and ever-increasing onslaught of bikes.

Finally, please consider the definition of "wilderness" in both federal and state law, which prohibits all forms of mechanical transport. This means that NO bicycles are allowed in federally designated or state-designated wilderness areas. We are keenly aware that the CHWP

is not a formally designated wilderness area. But words matter. As long as the word "wilderness" remains in the name of the Claremont Hills Wilderness Park, you should at least consider the letter and intent of federal and state definitions of wilderness, and attempt to at least mitigate the adverse effects of bikes to a reasonable degree.

We note that there is no formal requirement to allow bikes in the CHWP. And bicycling is NOT passive recreation. Any objective observer must conclude that bicycling is a very active form of recreation. Riders must be actively engaged and constantly vigilant of speed, slope, traction, obstacles, and other factors, and be actively engaging pedals and brakes as they are propelled along by a machine. And pressing a throttle to engage a motorized bike of any class is certainly not passive recreation.

Please remember that the CHWP was set aside for nature preservation and passive recreation. You are therefore under no obligation to allow bikes in the CHWP at all. Riding a bike in the CHWP is a privilege, and it should be carefully limited and controlled to avoid and/or mitigate the significant, adverse effects that bikes have on the passive recreation experience of other park visitors.

Thank you in advance for your time in considering and responding to our comments and concerns.

Sincerely yours,

Sarah Chisholm, Policy Coordinator
Coalition4Claremont@gmail.com

Cc: City Clerk

Attachments: Exhibits A and B

Exhibit A

LOCAL NEWS

Orange County firefighters report increase in E-bike fires



By Michele Gile
July 26, 2023 / 5:01 PM PDT / KCAL News

Firefighters in Orange County said they are seeing more fires started by lithium-ion batteries power everything from scooters to bikes.

The announcement comes after a Ladera Ranch family was kicked out of their

home after an early morning fire engulfed their garage in flames. Firefighters said an "E-mobility device," which a neighbor described as an electronic toy, was in the vicinity of the fire's ignition point. While the residents are safe, their home has been red-tagged.

Orange County Fire Authority Division Chief Nick Freeman handled a recent call involving an E-bike whose battery randomly exploded during a ride on an Irvine trail.

"The rider experienced the battery starting to warm and heat so he exited the bike and shortly thereafter the battery ignited in a fire, sending projectiles up to 40 feet from the bike," he said. "And it was very challenging to extinguish."

A fire caused major damage after an E-bike battery, which had been charging for days, exploded inside an apartment in Huntington Beach. The flames quickly spread through the home and blocked the front door, forcing the three residents inside to escape out of a window.

Crews also had a very difficult time putting out a fire at an electric bicycle distributor in Laguna Hills earlier this year. The warehouse contained a large number of bikes and batteries.

"That fire burned with extreme intensity and continued to burn for a period of roughly seven days as these batteries are prone to reignition," said Freeman.

The number of fires caused by lithium batteries keeps climbing with hundreds igniting flames in New York, causing some deaths. Officials in the city have

passed a law prohibiting the sale and rental of E-bikes and scooters that fail to meet recognized safety standards.

To be safe, experts with the OCFA issued a few tips:

- Unplug the device once it is fully charged
- Do not modify the battery
- Charge electric devices in a climate-controlled area, away from an exit
- Never charge while sleeping.

More from CBS News

[1,589 acre Silver Fire burning near Bishop prompts evacuation orders, warnings in Inyo, Mono counties](#)



[Driver hits multiple Orange County sheriff's units after crashing into police street closure in Stanton](#)



[2 teenagers riding scooter hospitalized after crash in Orange](#)



[Sales tax in Los Angeles County increases to 9.75%](#)



Michele Gile

Michele joined KCAL9 in 1990 as the Orange County reporter and she has loved it there ever since! She reports from the field for both KCAL9 and CBS2.



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Exhibit B

U.S. Forest Service - Inyo National Forest's Post

X



U.S. Forest Service - Inyo National Forest [O](#)

August 24, 2016 · 0

Cause of Rock Creek Fire Determined

The cause of the Rock Creek fire that started on August 5th has been determined. Investigators have concluded that the fire was started from a bicycle pedal strike to a rock. Conclusive evidence was found in the fire origin area that was on the Lower Rock Creek mountain bike trail. A fire ignition from this type of trigger is a testament to how dry the area is right now. All residents and visitors are asked to be extremely careful with anything that may cause a fire while you are out in the forest.

xxx-

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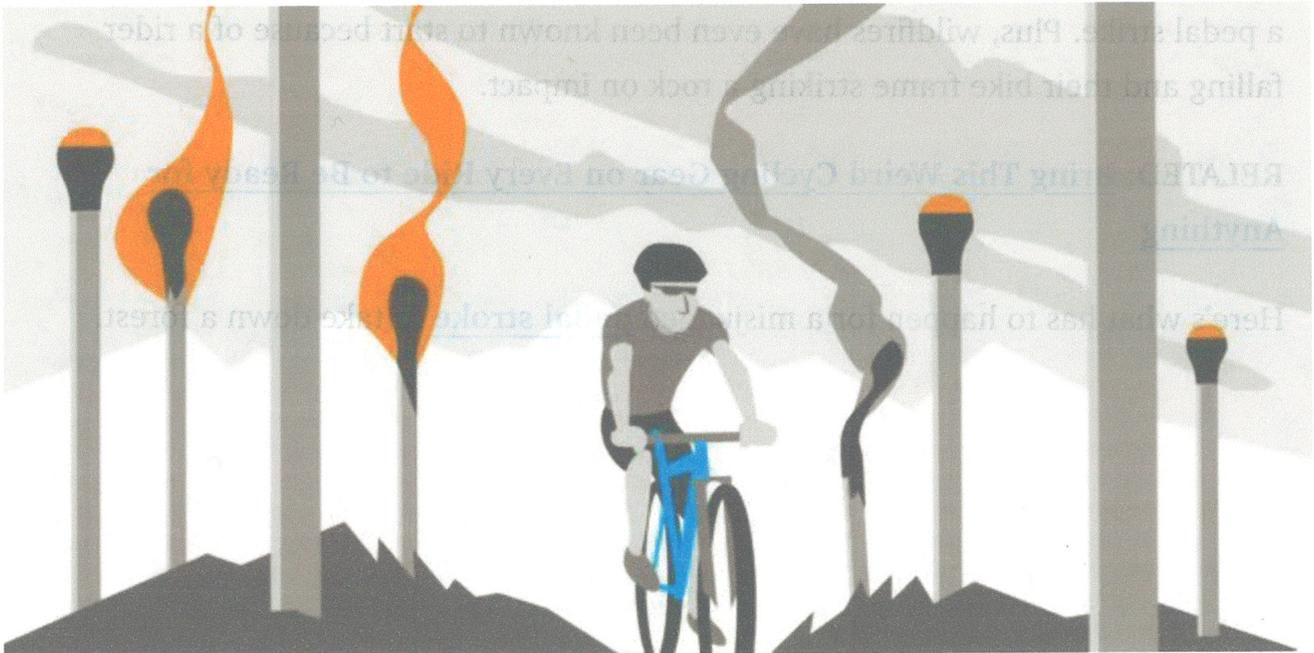
271 comments 238 shares

Rides > Mountain Bikes

How a Pedal Strike Can Start a Wildfire

WHEN FIRE INVESTIGATORS BLAMED A MOUNTAIN-BIKING MISSTEP FOR A WILDFIRE LAST MONTH, SOME CYCLISTS CALLED FOUL. BUT IT'S NOT AS WILD A CLAIM AS YOU'D THINK.

BY **MONICA PRELLE** Published: Sep 16, 2016 1:19 PM EDT



charlie layton

Your **mountain bike** isn't the only thing that can get damaged when you pedal-strike. In late August, Inyo National Forest fire investigators determined that a bike pedal colliding with a rock August 5 started the Rock Creek Fire in California's Eastern Sierra.

Keep up with the latest news in the cycling world with the [Bicycling newsletter!](#)

When three mountain bikers reached the bottom of the second section of the Lower Rock Creek Trail that day, they looked back and noticed smoke; a fourth mountain biker descending the trail saw the fire on the side and unsuccessfully

tried to stomp it out with his feet.

That section of trail is fast and winding, scattered with rocks, and surrounded by a dry, grassy slope. From a single pedal strike, the wildfire managed to burn 122 acres of forest before it was contained.

Sound ridiculous? Plenty of people thought so. The thing is, says Kirstie Butler, a fire prevention technician for the Inyo National Forest, while it's unlikely that a pedal strike would cause a wildfire, it's not impossible. A fire broke out during Stage 2 of the 2014 Transylvania Stage Race, which rangers believe was caused by a pedal strike. Plus, wildfires have even been known to start because of a rider falling and their bike frame striking a rock on impact.

RELATED: [Bring This Weird Cycling Gear on Every Ride to Be Ready for Anything](#)

Here's what has to happen for a misjudged [pedal stroke](#) to take down a forest.



The Ingredients



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Mountain [bike pedals](#) are typically made from aluminum alloy, but can also comprise titanium, magnesium, and plastic with steel components. Even though aluminum alloy is generally considered to be a 'spark-resistant' metal, it can sometimes be ferrous, meaning it contains iron; that's important, because iron is considered a pyrophoric material: It can ignite in the presence of oxygen alone.

Guess what most rocks are made of? Minerals like iron and magnesium, which are also incredibly pyrophoric. Simply, iron-bearing rocks don't spontaneously catch fire, because when pure iron is exposed to air, it rusts over, creating a protective film. It takes a lot of iron exposed to air simultaneously to build up enough heat to be of consequence.

RELATED: [Learn the Science of 'Wheeeee!' to Have Your Best Ride Ever](#)



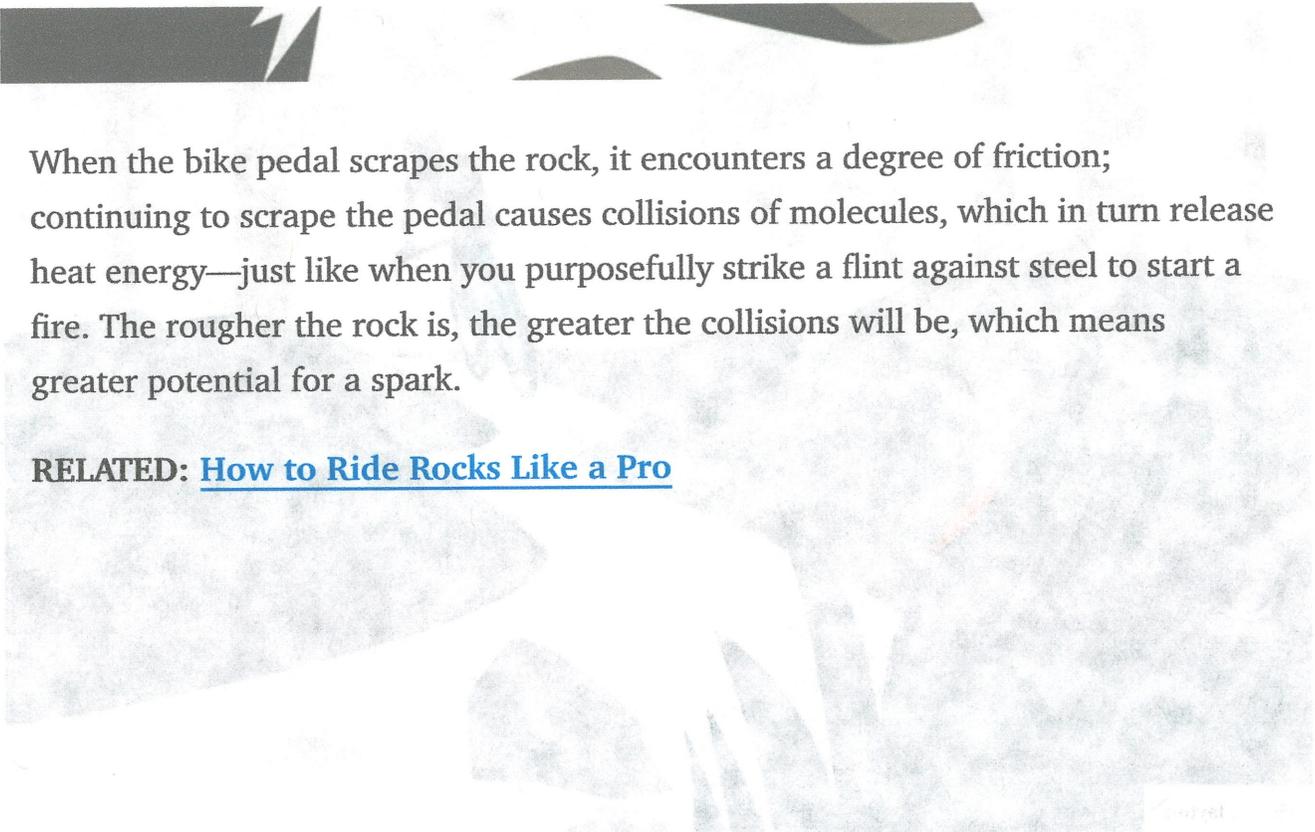
The Impact



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When the bike pedal scrapes the rock, it encounters a degree of friction; continuing to scrape the pedal causes collisions of molecules, which in turn release heat energy—just like when you purposefully strike a flint against steel to start a fire. The rougher the rock is, the greater the collisions will be, which means greater potential for a spark.

RELATED: [How to Ride Rocks Like a Pro](#)



The spark or ember is a tiny particle of burning-hot metal—in this case, one that chips off your pedal. Each type of metal found in [pedals](#) can produce sparks with different characteristics. The shape of the spark ranges from short and thin as with stainless steel, to long and wide when it comes from wrought iron. The color can be orange, yellow, or bright white, and the temperature of the spark can range anywhere between 300 and 2,000 degrees Fahrenheit. A spark may not seem hot in the air, but when it settles on another surface, it can ignite a flammable object.

The Ember



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The spark, or ember, is a tiny particle of burning-hot metal—in this case, one that chips off your pedal. Each type of metal found in [bike pedals](#) can produce sparks with different characteristics. The shape of the spark ranges from short and thin as with stainless steel, to long and wide when it comes from wrought iron. The color can be orange, yellow, or bright white, and the temperature of the spark can range anywhere between 300 and 3,000 degrees Fahrenheit. A spark may not seem hot in the air, but when it settles on another surface, its radiant heat can ignite a flammable object.

For a wildfire to ignite, it needs a combination of heat, fuel, and oxygen. In this case, a dry, windy day of pedal strikes surrounding the mountain bike trail is the fuel. Dry fuel sources have lower flash points, meaning they don't need to be as hot to ignite.

Environmental conditions play a big role in wildfire risk. Less-humid air can heat up more quickly which helps fire spread. A dense forest creates shade and humidity which both decrease fire conditions, while a through-sunken, dry, grassy slope in a hot climate with low relative humidity is a perfect storm for a wildfire.

The Inyo National Forest's average temperature of 50 to 80 degrees Fahrenheit and its relative humidity below 25 percent, combine to create ideal burning conditions. But says, "Humidity was in the single digits the day the Rock Creek fire started." Plus, the forest is full of dead trees—the result of a pine beetle infestation encouraged by drought, which means lower trees trapping humidity.

The Perfect Storm

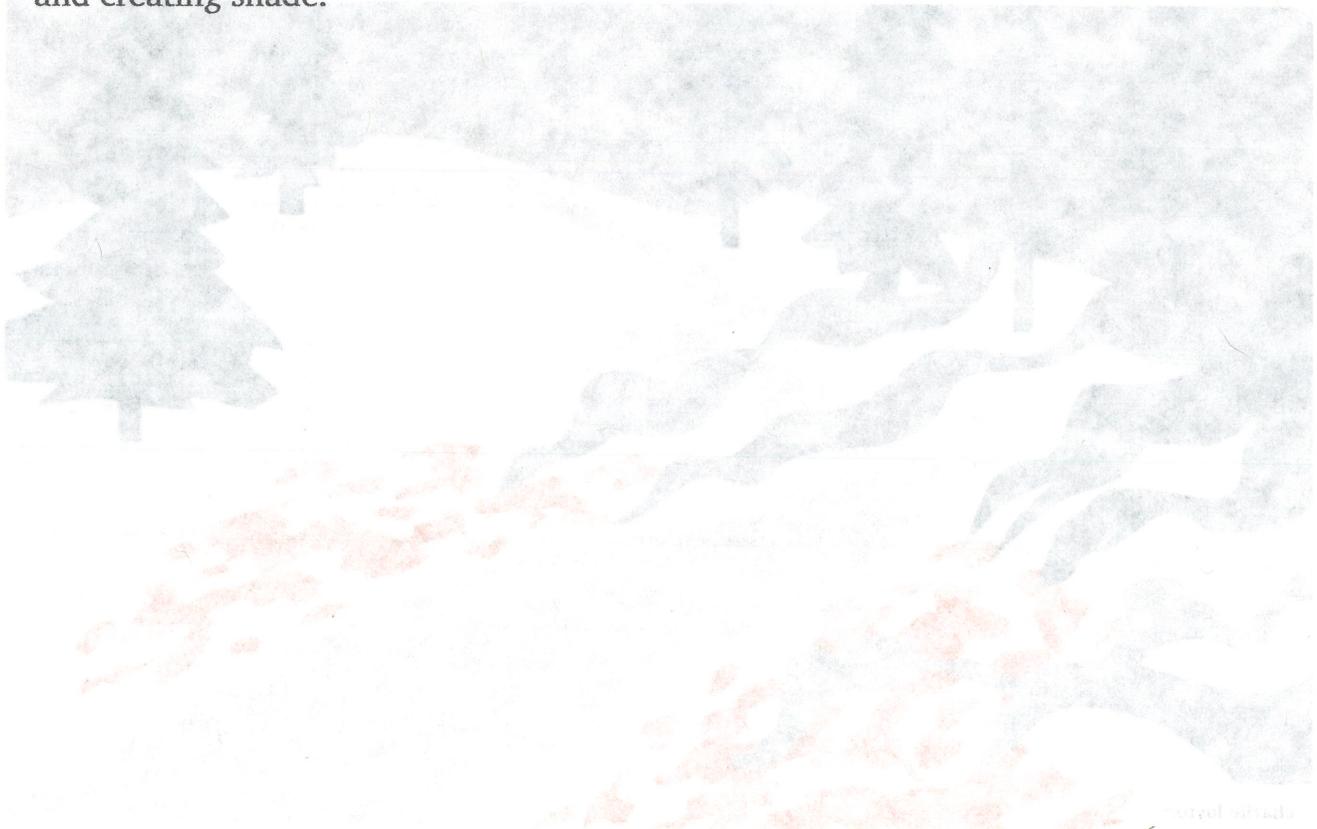


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For a wildfire to ignite, it needs a combination of heat, [oxygen](#), and fuel. In this case, a dry, brushy slope of cheat grass surrounding the [mountain bike trail](#) is the fuel. Drier fuel sources have lower flash points, meaning they don't need to be as hot to ignite.

Environmental conditions play a big role in wildfire risk. Less-humid air can heat up more quickly, which helps fire spread. A dense forest creates shade and humidity, which both decrease fire conditions, while a drought-stricken, dry, grassy slope in a hot climate with low relative humidity is a perfect storm for a wildfire.

The Inyo National Forest's average temperature of 80 to 90 degrees Fahrenheit, and its relative humidity below 25 percent, combine to create ideal burning conditions, Butler says. (Humidity was in the single digits the day the Rock Creek Fire started.) Plus, the forest is full of dead trees—the result of a pine beetle infestation encouraged by drought—which means fewer trees trapping humidity and creating shade.



The fire has grown and burned
the bike pedal having a
throughout the surrounding area.

The Full-Blown Fire

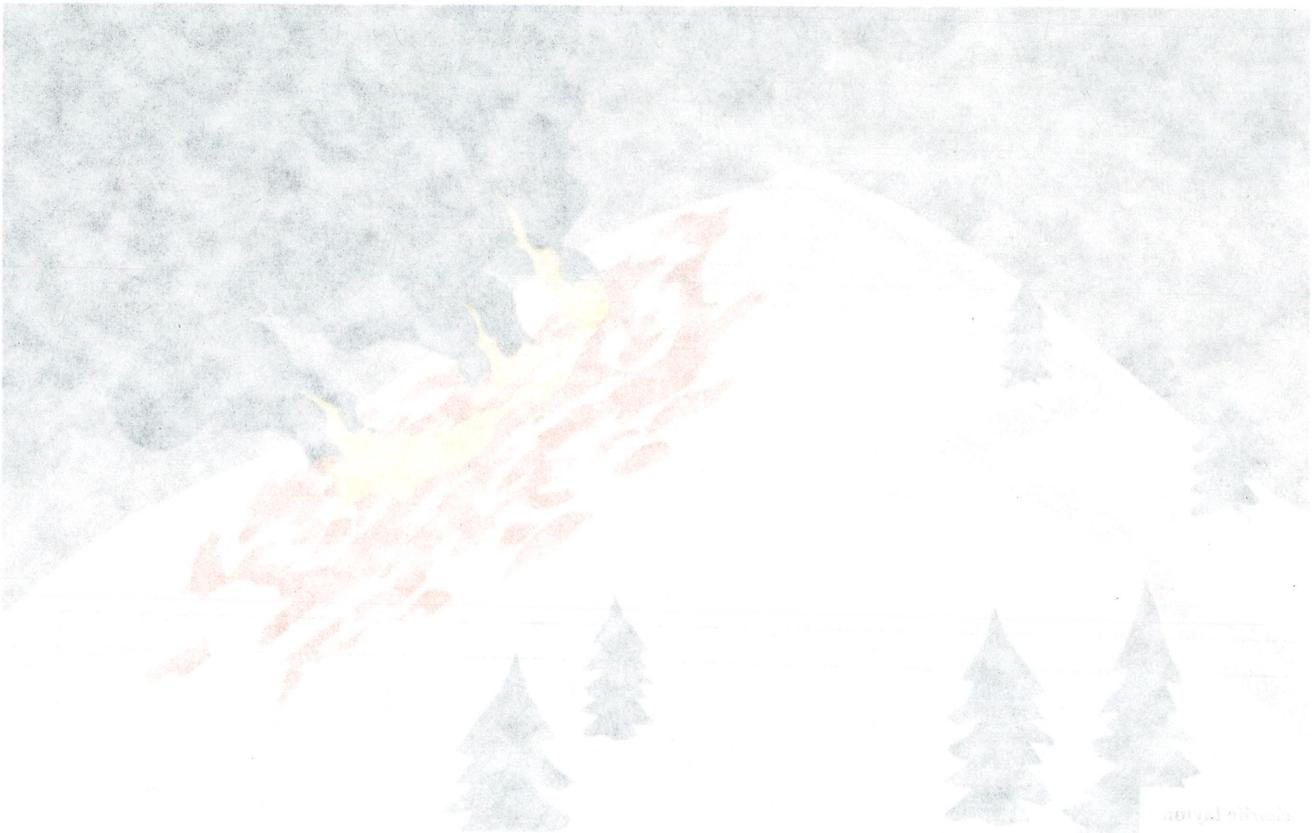


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After the bike pedal sends a hot spark into dry brush on the side of the mountain bike trail, it smolders and the brush catches fire. By the time the rider with the offending pedal hits the bottom of the trail, smoke can already be seen in the distance. The rider might call the fire in, but with heat, low humidity, light-to-moderate winds, and a flammable fuel source, there's not a great chance of cutting the problem off at the source; the higher the winds and drier the slope, the quicker the fire will spread. As soon as a fire gains steam, it can grow as fast as 7mph in forests and 14mph in grasslands. By the time a rider who unknowingly ignited the

fire is back home having a [cold beer](#), a wildfire could have grown and burned throughout the surrounding area.

The Full-Blown Fire



After the bike pedal sends a hot spark into dry brush on the side of the mountain bike trail, it smolders and the brush catches fire. By the time the rider with the offending pedal hits the bottom of the trail, smoke can already be seen in the distance. The rider might call the fire in, but with heat, low humidity, light-to-moderate winds, and a flammable fuel source, there's not a great chance of cutting the problem off at the source; the higher the winds and drier the slope, the quicker the fire will spread. As soon as a fire gains steam, it can grow as fast as wind in forests and fields in grasslands. By the time a rider who unknowingly ignited the

From: [OpenForms](#)
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Subject: Response to City Public Comment Form
Date: Thursday, April 3, 2025 10:49:40 AM

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Response to City Public Comment Form

Contact Information	
Name	tomas suk
Street Address	xxx Bonita Ave
City, State Zip Code	Claremont, CA 91711
Email Address	[REDACTED]
Phone Number	xxx-xxx-xxxx
Meeting and Agenda Item Information	
Select the Meeting Type	City Council Meeting
Meeting	

Date	04/08/2025
Topic or Agenda Item	Wilderness Park Ordinance
Public Comment	<p>PLEASE reconsider. PLEASE remove from consent and reconsider:</p> <ol style="list-style-type: none"> 1) You should have a more detailed consideration of fire risk before allowing unlimited numbers of unregulated e-bikes in the park 2) You should consider closing the park to bikes 2-4 days per week to allow pedestrians to enjoy a quiet, stress-free, passive recreation experience -- without being buzzed by fast-moving bikes, without being repeatedly yelled at by bikers, and without having to breathe dust created by fast-moving bikes. I support closing the park to bikes on Tues,Thurs and Sun, as suggested by many others. 3) The heavily proscriptive prohibition on walking more that two abreast is the WRONG approach. Your counsel made clear (AFTER close of public comment) that in the event of a collision, even a reckless bike rider could sue a mom and dad walking with their child between them. You are creating a legal argument for reckless riders who veer over the centerline of the road to blame the collision on a family of three, even if they were walking far to the right. You should instead consider PERFORMANCE BASED rules, such as all users of the park should travel to the right of the center line of the road. Don't create legal arguments for reckless riders to blame collisions on pedestrians. Your rangers said they won't seek to cite a mom and dad with child between them. THAT'S NOT THE ISSUE. The issue is that your overly proscriptive ban on walking more than two abreast creates legal jeopardy for anyone walking more than two abreast, even if they are far to the right and staying on the right side of the road. Remember this is mountain lion habitat. Moms and dads should be allowed to walk with their child between them, as long as they remain to the right of the center line of



	the road.
Document or Image	

