

September 26, 2023

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Board of Forestry and Fire Protection,  
Attn: Regulations Priority Review, Board of Forestry and Fire Protection  
P.O. Box 944246  
Sacramento, CA. 94244-2460

RE: **Board of Forestry and Fire Protection 2023 Regulations and Priority Review Meeting On 11/8/23**  
E-Bikes and other E-Vehicles on Remote Trails in State Parks

To Whom It May Concern:

I am writing in response to your announcement (dated 9/5/23) requesting written comments on:

1. *“Areas where questions exist on interpretation of the regulatory standards, including potential solutions.*
2. *Issues encountered in achieving compliance with the regulatory standards, including potential solutions.*
3. *Suggested regulatory modifications which would either clarify existing rule language to better achieve the intended resource protection, or would reduce regulatory inefficiencies and maintain the same or better level of protection.”*

As a registered fire protection engineer in the State of California and a Commissioner on California Buildings Standards Commission (though I am not representing the commission or the governor’s office in this matter), I have serious concerns with allowing E-bikes and other E-vehicles in remotes areas of state parks. The frequency of fires involving E-bikes and other E-Vehicles (due to the lithium batteries or lithium type batteries used on these bikes) is rising throughout the country. The lithium batteries on these bikes are as large as 52 volts, much larger than a standard 3-4 volt lithium battery in a flashlight or a phone. Once ignited, these batteries are difficult to extinguish. Water (e.g. from a water bottle) will typically not extinguish fires from small lithium batteries such as a phone, let alone a 52 volt battery. This can pose a serious fire hazard to state parks.

A possible solution is to allow ADA/Wheelchair accessible vehicles only within state parks (or remote areas where fire engines cannot be accessed), thereby limiting the number of lithium battery operated vehicle (i.e. reduce the probability of a fire by reducing the number).

In summary, I believe allowance of E-bikes and other E-vehicles on trails would create an immediate physical hazard to all other users on trails, as well as create a serious fire risk to our dry and arid urban wildland interface areas. While the use of E-Bikes and other E-Vehicles is very necessary in urban areas and on roads as part of the climate change initiative and overall reduction in greenhouse gas emission, the use of these vehicles in remote areas may counteract the goals set by California by increasing the large forest fire risk.

Your consideration on this issue is greatly appreciated.

Sincerely,  
Klausbruckner & Associates Inc.



Elley Klausbruckner, PE  
Fire Protection Consultant