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June 11, 2024

California Building Standards Commission
Michael Nearman, Deputy Executive Director
2525 Natomas Park Drive, Suite 130
Sacramento, CA 95833

Sent Via Email: cbsc@dgs.ca.gov

Re: Bike Parking

To Whom It May Concern:

On behalf of the California Bicycle Coalition (CalBike) and our 60,000 members, we appreciate the efforts of the California Building Standards Commission (BSC) and Department of Housing & Community Development (HCD) staff to amend the 2025 California Green Building Standards Code. We recommend you consider the following suggestions.

Bike Parking Definitions

We appreciate the current definition of bike parking within the HDC proposed change. We recommend adding to the definitions additional accommodations for larger or longer bikes, which can include e-bikes, cargo bikes, and adaptive bikes for people with disabilities. We also recommend that you carry over these definitions to the nonresidential code (BSC) sections while also considering our additional changes. Currently, there are no bicycle parking definitions within the nonresidential code, and clear definitions are necessary.

For section **5.106.4.1.1** "Short-term bicycle parking" we recommend the following list of conditions:

- Be within 200 feet of the visitors entrance.
- Be readily discoverable along the likely path of travel by bicycle visitors
- Be readily observable to passers-by, to discourage theft.
- Accommodate longer cargo and child carrier bikes for at least half the positions.
- Be covered by building security cameras, for all projects where external cameras are also newly installed.

For **4.106.4.4.2** "Long-term bicycle parking for multifamily buildings" add to the list of "may include" acceptable features:

- Charging outlets for electric bikes and a shelf to charge battery packs.
- Fire rated construction, no different than a motor vehicle storage facility, due to the presence of electric vehicle batteries on electric bikes and scooters.
- When combined in the same area as motor vehicle parking, a flexible design such that the bicycle parking can be seamlessly expanded into adjacent motor vehicle parking, should future demand warrant.
- Security camera coverage, for buildings with security camera coverage of motor vehicle storage or vehicle movement areas.

Remove Exceptions for Short and Long-Term Bike Parking

We recommend that you remove or reconsider the exceptions in the nonresidential code sections for short and long-term bike parking. We are concerned that there is no defined metric for measuring the foot traffic volume of a given retail store, both from past historical values and new values predicted when a retail store is proposed. It is unclear what data building occupants must provide to show how many foot traffic visitors there have been before and will be after an alteration. Thus it seems that the exception is not well defined, and setting a limit of nine added foot traffic visitors seems vague and indeterminate.

We are concerned that an applicant does not have to add any bicycle parking to satisfy permitting requirements if their change does not increase the number of people on foot or increase the number of tenant occupants. The exemptions take the view that if an alteration of an existing structure does not increase foot traffic or the number of tenant occupants, the application does not need to take any corrective actions and thus does not need to add any bicycle parking. Indeed, this is the current situation where most alterations result in having no bicycle parking, either short-term or long term after an alteration.

But our mobility options have expanded, and active transportation is much more important and popular than ever before. Thus, the previously accepted standard that bicycle parking isn't required no longer applies, and we strongly urge you to eliminate the proposed exemptions.

Electric Charging For All

Electric bicycles are surging in popularity and represent a significant share of all bikes. CALGreen should accommodate this growing share of devices. For long-term bike parking facilities within nonresidential and residential buildings, we recommend CALGreen ensure and facilitate electric bike battery charging. We urge the state to consider all the charging needs for all vehicle types in new and existing unmodified buildings. We endorse the work of the EV Charging for All Coalition in highlighting these issues, and urge the state to look to that group for guidance. In particular, we echo EVCAC's comments that setting a minimum width for parking spots that have EV charging is inappropriate and moves in the wrong direction by encouraging ever larger and heavier vehicles.

Long-Term Residential Bike Parking

Long-term bike parking in multifamily dwellings is a significant concern, given the lack of available space in rental units. The proposed code change to allow 0.5 bicycle parking spots per unit for multi-family residents is not enough. We recommend you follow local examples across California that provide on-site long-term bike parking spots at a ratio of at least one per dwelling unit.

We look forward to working with BSC and HCD to support these important changes to CALGreen. If you would like to talk more in-depth about the above recommendations please feel free to contact me at jared@calbike.org or (714) 262-0921. Thank you.

Sincerely,



Jared Sanchez, Policy Director
California Bicycle Coalition

Cc:

Kevin Day, Deputy Executive Director, BSC
Mitchel Baker, Assistant Deputy Director