

From: [Eric Smith](#)
To: CBSC@DGS
Subject: 15-Day Express Terms: BSC 03/24 Item 1-1
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Attachments: [image001.jpg](#)

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To whom it may concern,

In the additional 15-Day Express Terms for the 2025 California Green Building Standards Code, and the 45-Day Express Terms as well, Item 1-1 states that permanently anchored bicycle racks shall be provided *for 20 percent of the peak daily visitors*. My concern is that determining the minimum required bicycle racks, beyond the minimum two-bike capacity, will be unworkable for new projects. New projects would typically lack data to draw from in their estimation of peak daily visitors. Even the traffic of large franchises can vary immensely between locations. The result would likely be many locations reasonably showing that only the minimum capacity would be required, only to draw more visitor traffic when the project opens. Tying the requirement to occupant load and occupancy type, parking spaces, or some other element of the built environment would give the authorities tasked with enforcing these provisions a more concrete means to determine compliance at the plan review stage.

Additionally, I believe that peak daily visitors would need to be a defined term in the 2025 California Green Building Standards Code if this section is to be uniformly enforced throughout the state.

Sincerely,



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