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June 18, 2024

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

## Re: Proposed Amendments to the 2025 California Green Building Standards Code

Dear Mr. Nearman:

The Sonoma County Bicycle Coalition has recently learned about 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 ask that you consider the following suggestions regarding bike parking.

### Bike Parking Definitions

We appreciate the current definition of bike parking within the HDC proposed change; it could be improved by adding accommodations for larger or longer bikes, which can include e-bikes, cargo bikes, and adaptive bikes for people with disabilities. These definitions should also be applied to the nonresidential code (BSC) sections. 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 entrance.
- Be readily discoverable along the likely path of travel by bicycle visitors.
- Be readily observable to passers-by, to discourage theft.
- Supports bike upright with two points of contact.
- Allows locking of frame and at least one wheel with a U-lock.
- Is installed with manufacturer's recommended clearance from walls, poles, etc.
- Accommodate longer cargo and child carrier bikes for at least half the positions.

(I have seen far too many completely useless bike racks, due to design or incorrect installation.)

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. To my knowledge there is no defined metric for measuring the foot traffic volume of a given retail store.

It does not make sense 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. Bike parking is woefully absent from so many of our business and shopping areas and to be "green" we need to be adding bike parking wherever we can! The absence of secure bike parking is a big barrier for those wanting to do shopping and other errands by bike.

### **Long-Term Residential Bike Parking**

As a long-time apartment dweller, I know that long-term bike parking in multifamily dwellings is a significant concern; most rental units do not have enough space and hauling bikes up stairs is not an option. The proposed code change to allow 0.5 bicycle parking spots per unit for multi-family residents is not enough. We recommend you require at least one per dwelling unit.

Thank you for your consideration.

Sincerely,



Eris Weaver, Executive Director