



July 1, 2024

Sent via email to: cbsc@dgs.ca.gov

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

Subject: Notice of 45-Day Public Comment Period for Proposed Building Standards

Dear Michael Nearman:

The City of Fremont appreciates the opportunity to provide comments on the intended California Green Building Standards Code changes. The following are comments and recommended changes that would allow for the effective review and implementation of development and building projects.

Nonresidential Bicycle Parking

For nonresidential bicycle parking requirements, we ask the California Building Standards Commission (CBSC) to revisit the thresholds for when bicycle parking is required, especially for projects involving additions and alterations of existing facilities. At a minimum, at least one net new short-term and long-term bicycle parking facility should be required for all projects meeting the existing CALGreen Code scoping provisions. Current CALGreen Code regulations already exempt projects with permit valuations of less than \$200,000. Furthermore, projects adding less than 1,000 square feet also do not trigger CALGreen Code requirements. As such, additional exceptions based on vague and difficult to quantify measures of visitors and tenant-occupants could be redundant and counterproductive, potentially requiring substantially more time to review and approve the proposed projects. This is especially true and evident in project sites that were built prior to established bike parking requirements, where additions or alterations that meet the exceptions would not be required to add any new bike parking at a location where none were previously provided. This is an area of the CALGreen Code that needs to be addressed and rectified to ensure that an already developed site that has no previous bike parking facilities will at least add one short term space for existing visitors and not just for net new visitors.

Electric Bicycle Charging Infrastructure

For residential and nonresidential bicycle parking requirements, we ask that the CALGreen Code provisions consider providing electric bicycle charging infrastructure for some of the required bicycle parking spaces, with policies that are similar in requirements and exceptions as outlined in the CALGreen Code provisions for vehicles. In the City of Fremont and across the

nation, electric bicycle purchases have now exceeded that of electric vehicles, and there's now a need to provide charging infrastructure equivalent to which we require for electric vehicles.

Definition of Bicycle Types

We also ask that CALGreen Code provisions encourage that at least some percentage of the required residential and nonresidential bicycle parking facilities would be adequate to accommodate longer and larger bicycles, such as electric, cargo, child carrier, and adaptive bicycles. As previously mentioned, the City of Fremont is seeing an increase in bicycle types being utilized across the city and these bicycle types should be acknowledged and accommodated in the CALGreen Code provisions moving forward.

Thank you for your consideration. Please contact me with any questions you may have at hlarsen@fremont.gov.

Sincerely,



Hans Larsen
Public Works Director