



Jun 28, 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

To Whom It May Concern:

On behalf of Bike East Bay, representing our members and supports in Alameda and Contra Costa County, we appreciate the efforts of the California Building Standards Commission (BSC) and Department of Housing and 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 proposed change. We recommended adding to the definition accommodations for e-bikes, cargo bikes, and adaptive bikes for people with disabilities. This would better encompass the different types of devices people use.

Electric Charging For All

Electric bicycles are surging in popularity and represent a significant share of all bikes, especially as the state and municipalities are rolling out incentive programs. 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.

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Long term parking at multi-family buildings.

Long-term bicycle parking for multifamily buildings proposal to provide 0.5 long-term bicycle parking spots per dwelling unit is extremely inadequate. A multi-family residence must allow bicycle parking for at least one per dwelling in just about any city in California. Additionally, new construction frequently employs vertical hanging racks or vertically stacked racks for long-term bicycle parking in multi-family dwellings and such racks are extremely difficult if not impossible to use for heavy electric or cargo bicycles.

Short-term and Long-term bicycle parking. |

We recommend to remove or reconsider the exemptions in the nonresidential code for short-term parking. The exemption for an increase in visitors of nine or less is arbitrary. 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. The number of employees may be easier to verify than visitor foot traffic. We are concerned that an applicant does not have to add any bicycle parking to satisfy permitting requirements if their change is not projected to increase the number of people on foot. The exemptions take the view that if an alteration of an existing structure does not increase foot traffic, the applicant doesn't need to take any corrective actions and thus doesn't need to add any bicycle parking. 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.

Sincerely,

A handwritten signature in black ink, appearing to read "Justin Hu-Nguyen".

Justin Hu-Nguyen
Co-Executive Director Of Mobility Justice
Bike East Bay