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To: CBSC@DGS
Subject: Public Comment - Bike Parking in the 2025 California Green Building Standards Code
Date: Monday, July 1, 2024 11:57:57 PM

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To Whom It May Concern:

First off, I applaud the California Department of Housing & Community Development (HCD) for proposing to move the residential bicycle parking measures into the Residential Mandatory Measures chapter, whereas before they were in a voluntary appendix. Above all else, this is a huge improvement.

I support the comments made in the public comment letter from the California Bicycle Coalition (CalBike), dated June 11, 2024, regarding Bike Parking. It is important to make sure that there is enough bicycle parking available so that more people can freely choose to switch to biking. That includes having parking flexibility to be able to support more e-bikes, cargo bikes, and adult tricycles and other adaptive bikes for people with disabilities. I urge you to adopt all of CalBike's suggestions. Additionally, I have some suggestions of my own.

Section 4.106.4.4.2 "Long-term bicycle parking for multifamily buildings"

I recommend CalBike's suggestions for the list of "may include" acceptable features. I also agree with them that only requiring one bicycle parking space per every other dwelling unit is far from sufficient. The bare minimum acceptable requirement here should be one bicycle parking space for every dwelling unit. That would be an acceptable compromise for this Triennial Code Cycle. Though even that is insufficient in my mind.

Something like this would begin to be sufficient for this Code Cycle: "Provide on-site bicycle parking that satisfies all of these minimum ratios: (a) a minimum ratio of at least one bicycle parking space for every one dwelling unit; and (b) a minimum ratio of at least one bicycle parking space for every one tenant-occupant vehicular parking space." Examples:

- At a multifamily building with 100 dwelling units and 90 car parking spaces, there would be a requirement for at least 100 bicycle parking spaces.
- At a multifamily building with 100 dwelling units and 150 car parking spaces, there would be a requirement for at least 150 bicycle parking spaces.

In the near future, during future Code Cycles, these numbers should be increased further. These are some ideal targets for what the Code should eventually settle on:

- For every dwelling unit in the multifamily building, it should contribute the following to the total minimum number of bicycle parking spaces: the lesser of:
 - The maximum legally allowed occupancy; OR
 - $2 \times (1 + \text{the number of bedrooms})$
- A minimum ratio of at least three bicycle parking spaces for every one tenant-occupant vehicular parking space

Section 5.106.4.1.1 "Short-term bicycle parking"

I recommend CalBike's suggestions. Furthermore, I agree that the change "provide permanently anchored bicycle racks [...] for ~~5 percent of new visitor motorized vehicle parking spaces~~ *10 percent of new anticipated peak daily visitors* being added" is a welcome improvement.

However, when considering destinations within a dense urban area or a semi-dense suburban area, I don't think it goes far enough. In those kinds of geographies, I think it should be: "provide permanently anchored bicycle racks [...] for *the greater of (a) 100 percent of net new visitor motorized vehicle parking spaces being added; or (b) 10 percent (rounded up to the nearest whole number)* of new anticipated peak daily visitors being added". This has the same spirit as the BSC's proposed change, but improves upon the outcome in two ways:

- Rounding up ensures that there will always be enough short-term bicycle parking for at least 20% of new anticipated visitors being added.
- Using "net new visitor motorized vehicle parking spaces being added" as a floor prevents a project from implementing a visitor vehicle parking expansion, claiming that it will not induce new visitors, and subsequently avoiding their obligation to provide bicycle parking.
 - This floor ensures that no new visitors *need* to drive low-occupancy vehicles to the location. There would be ample bicycle parking for every new vehicle driver + 1 passenger to instead ride bicycles and park at the destination.
 - Bicycle parking spaces are smaller, cheaper, and more land-use efficient than car parking spaces, so any project developer who can afford to create new car parking, could easily create the same number of bicycle parking spaces without hardship.

Section 5.106.4.1.2 "Long-term bicycle parking"

For Section 5.106.4.1.2 and all its renumbered sub-sections, I suggest changes similar to what I proposed above for Section 5.106.4.1.1 "Short-term bicycle parking". That is, be explicit that numbers shall be rounded up, and (within a dense urban area or a semi-dense suburban area) add a minimum floor that is equal to 100% of "net new tenant-occupant vehicular parking spaces being added".

Sincerely,
Jordan Moldow (speaking on behalf of myself)
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