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California Building Standards Commission
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Sent via email cbsc@dgs.ca.gov

To Whom It May Concern:

I 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. I recommend you consider the following suggestions.

In regard to HCD 2025 California Green Building Standards Code, Part 11.

Item 5, Chapter 4 Section 4.106.4.4 Bicycle Parking. 4.106.4.4.2 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. There should be a presumption that occupants of all dwellings will utilize a bicycle for some sort of local transit, especially within urban areas. Please take note that Emeryville recently updated its building codes and specified long-term bicycle parking at a rate of one spot per bedroom. Additionally, the cost of bicycle parking is low, much less than car parking. 4.106.4.4.2 may include an exemption if the multi-family residence includes an enclosed garage with the dwelling unit. In addition to the requirement for the number of parking spots per unit, the type of parking should be clarified to specify that all long-term parking spots must be horizontal on the level of the floor. 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. Additionally, the location for long-term parking must include a sufficient number of electrical outlets to allow a reasonable number of e-bicycles to charge

In regard to BSC 2025 California Green Building Standards Code, Part 11.

Item 1 Chapter 5 section 5.106.4.1 Bicycle Parking.

5.106.4.1.1 Short-term bicycle parking. I recommend to remove or reconsider the exemptions in the nonresidential code for short-term parking. The change from tying bicycle parking requirements from vehicle parking sites to the volume of visitors is a welcome change. However, the exemption for an increase in visitors of nine or less is arbitrary and not workable. Most alterations for which this rule applies to are for retail stores and there is not a record or defined metric of the foot traffic volume for 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. Many cities have older legacy sites that generate visitors and have no bicycle parking. It's critical that a change in those sites add a minimum number of short-term parking spots. We have seen in my hometown of Fremont that most alterations start with zero bicycle parking and end with zero bicycle parking because applicants claim they are exempt because the parking does not change from the previous tenant. The exemption as listed for visitation can be invoked with any visitation data that is able to satisfy local code officials and maintain zero bicycle parking. Suggest to either remove the exemption or require that the minimum of one two-bike capacity rack be maintained even if an exemption based on a change in visitation is invoked. Additionally, the requirement to provide bicycle parking racks for 20 percent of peak daily visitors seems very high, especially for rural and even suburban areas. It creates a situation where a new construction business will have a very large number of bicycle racks, but an existing business that undergoes an alteration but is able to show no change in visitation will continue to have no bicycle parking. The public would be better served if the required percent of bicycle parking were less, but the requirement applied both new construction and alterations so as to provide a reasonable amount of bicycle parking at all new and altered locations.

5.106.4.1.2. Long-term bicycle parking. 5.106.4.1.2.1 effectively contains an exemption for an alteration that adds fewer than 10 tenant-occupants. The change from tying long-term bicycle parking to the number of tenant-occupants instead of vehicular parking sites is a welcome change. However, the number of tenant occupants typically varies between seasons and business conditions and thus is not well defined. It is unlikely that any alteration can provide unbiased values for the number of tenant-occupants before and after an alteration. Note that some alterations occur in buildings that have been vacant for years and may drastically change business types, making determination of a change in tenant occupants impossible or irrelevant. It is best that 5.106.4.1.2.1 be based solely on the number of tenant-occupants. If an exemption is mandatory, it would be better that an alteration that adds fewer than 10 tenant-occupants be allowed to provide a parking facility that is a covered and secured enclosure without permanently anchored racks. In other words, allow the applicant to assign a number of square feet consistent with the bicycle parking capacity requirement within any covered and secured area of the site. Otherwise alterations will have situations similar to the proposed short-term

parking exemptions where a building with a previous occupant that had no long-term bicycle parking will continue to have no long-term bicycle parking of any type after an alteration.