



July 16, 2025

California Building Standards Commission
 Michael Nearman, Deputy Executive Director
 2525 Natomas Park Drive, Suite 130
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Sent Via Email: cbsc@dgs.ca.gov

Re: Bike Parking - 2025 California Green Building Standards Code

To Whom It May Concern:

On behalf of the undersigned organizations, we appreciate 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 recommend you consider the following suggestions. We also recommend that updates reflect the Association of Pedestrian and Bicycle Professionals (APBP) Bicycle Parking Guidelines. APBP's Guidelines provide a standard for what good bike parking entails.

Bike Parking Definitions

We appreciate the current definition of bike parking within the HDC proposed change. We recommend adding to the definitions additional accommodations for larger or longer bikes, which can include e-bikes, cargo bikes, and adaptive bikes for people with disabilities. We also recommend that you carry over these definitions to the nonresidential code (BSC) sections

while also considering our additional changes. Currently, there are no bicycle parking definitions within the nonresidential code, and clear definitions are necessary.

For sections **4.106.4.4** and **5.106.4.1.1** "Short-term bicycle parking" we recommend the following list of conditions:

- Be within 50 feet of the main entrance. 50 feet is ideal, but at a minimum we request LEED bike parking standards, which is within 100 feet of the main entrance, be met.
- Be readily discoverable along the likely path of travel by bicycle visitors.
- Be readily observable to passers-by, to discourage theft.
- Accommodate longer cargo and child carrier bikes for at least half the positions.
- Be covered by building security cameras, for all projects where external cameras are also newly installed.

For **4.106.4.4.2** "Long-term bicycle parking for multifamily buildings" add to the list of *"may include"* the below acceptable features. LEED standards for residential long-term parking is to "provide long-term bicycle storage for at least 30% of all regular building occupants, but no less than one storage space per residential unit in addition to the short-term bicycle storage spaces."

- Charging outlets for electric bikes and a shelf to charge battery packs.
- Fire-rated construction, no different than a motor vehicle storage facility.
- 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.
- Options for secure access control include user-supplied locks, keys, smart cards, and other technologies.
- Security camera coverage, for buildings with security camera coverage of motor vehicle storage or vehicle movement areas.

Bicycle Rack Selection

Bicycle racks are manufactured in a variety of forms. According to APBP's Guidelines, only u-racks, post-and-ring racks, and wheel-well-secure racks are effective for short-term bike parking. We recommend requiring these APBP-approved designs for short-term bike parking. The League of American Bicyclists considers the percentage of short-term bike racks that comply with APBP guidelines in its rankings of "Bicycle Friendly Communities," a designation that many municipalities are interested in establishing and maintaining. Requiring APBP compliance will better position applicants for higher rankings.

For long-term bike parking and high-density bike parking, we recommend including a link to APBP's [Essentials of Bike Parking](#).

Long-Term Residential Bike Parking

Long-term bike parking in multifamily dwellings is a significant concern, given the lack of available space in rental units. The proposed code change to allow 0.5 bicycle parking spots per unit for multi-family residents is not enough. We recommend you follow local examples across California that provide on-site long-term bike parking spots:

- At least 1 long-term bicycle parking space for every studio and 1-bedroom unit
- At least 2 covered long-term bicycle parking spaces for each unit with 2 or more bedrooms
- For units with more than 2 bedrooms, at least 1 covered long-term bicycle parking space per bedroom is preferred

With the increase in cargo bikes and electric-assist bikes, there must be more consideration of these different modes. For example, Emeryville's ordinance says at least 50% of the spots have to be horizontal, at least 10% have to accommodate large cargo bikes, and at least 10% have to have access to outlets for ebike charging (including at least 50% of the cargo bike spots).

AB 130 Restrictions

On June 30th, 2025, AB 130 was signed into law which prohibits the California Building Standards Commission (CBSC) and any other adopting agency (including cities or counties), from October 1, 2025 until June 1, 2031, from considering, approving, or adopting any proposed building standards (including green building standards) affecting residential units unless a set of conditions is met. We are concerned that this new law may impede the implementation of these new bike parking standards. We ask that you please clarify the impact of this new law, if any, on bike parking standards set to go into effect January 1, 2026.

We look forward to working with BSC and HCD to support these important changes to CALGreen. If you would like to talk more in-depth about the above recommendations, please feel free to contact Jared Sanchez at jared@calbike.org or (714) 262-0921. Thank you.

Sincerely,

Jared Sanchez, Policy Director
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Cc:

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