

From: Adam Goodman
To: Planning
Subject: Bike Parking Ordinance
Date: Tuesday, November 4, 2025 5:04:43 PM
Attachments: [2025-11-04 Bike Parking Ordinance Comments.pdf](#)

Please see attached for comments / suggestions on the proposed bike parking ordinance.

- Adam

Planning commissioners and staff,

I'm writing to offer some feedback and suggestions regarding the proposed [ordinance to update our bike parking requirements](#). First of all, thank you very much for your work on this issue - broadly speaking, I think the changes proposed in this ordinance are positive and would move our code in the right direction. However, I think they could still be improved.

Rack Design Standards

My primary concern is with bike rack design and placement. I believe the changes in this proposed ordinance address rack placement adequately, but are insufficiently specific as to rack design. As I've written to you before, I would strongly prefer to see a regulatory framework with the following elements:

1. The [APBP](#) and/or [Boston](#) "performance criteria" for bicycle racks are fully incorporated into our code¹
2. A specific set of rack designs are pre-approved (post-and-ring, inverted U / staple), while known "bad" rack designs are also identified and explicitly prohibited
3. The planning manager is granted discretion to review any other proposed rack designs against the performance criteria

For the purposes of this discussion, here are the Boston performance criteria:

Criterion	Details
A. Supports bike upright	The rack provides two points of contact with the frame—at least 6" apart horizontally. Alternatively, if a rack cradles a bike's wheel, it also supports the frame securely at one point or more. The rack's highest point of contact is at least 2'8" off the ground
B. Allows locking of frame and at least one wheel with a U-lock	A closed loop of the rack allows a single U-lock to capture one wheel and a closed section of the bike frame. The rack tube's cross section is no larger than 2"—allowing locking with smaller U-locks.
C. Materials are durable and secure	The rack is made from durable and difficult to cut materials, such as steel or stainless steel. Rack finish is appropriate to the location.
D. Use is intuitive	The rack is recognizable by first-time users and easily usable as intended without the need for written instructions.
E. Accommodates a variety of bikes and attachments	The rack serves common bike styles, including cargo bikes and accessible bikes. The rack does not restrict the length, height, or width of bikes, attachments (such as baskets), or wheels

¹ These two lists are nearly identical, so either could be acceptable

Meanwhile, our proposed ordinance would state in 5.19.7(A)(4):

All bicycle parking spaces must be easily accessible, well lit, and durable, and securely anchored to pavement, floors, or walls. Users must be able to use standard bicycle locks to lock their bicycle frame and at least one wheel to the rack. Rack use should be generally intuitive, should not require above average effort to use, and should have signage to explain functionality.

This paragraph arguably covers Criteria B, C, and D out of Boston's list (and E might be addressed by the separate provisions to require accessible spaces). The problem is, however, that the details matter.

For example, the Westgate Kroger (400 S Maple Rd, Ann Arbor, MI 48103) has [bike racks](#) that are in most ways consistent with these guidelines and best-practices. However, there is one issue: the tubing on these racks is unusually thick. I sometimes use a [Kryptonite Mini-6](#) lock, and it turns out that its shackle is too narrow to fit around this rack tubing. So there is a good reason that Boston / ABPB require the rack tubing cross-section to be not greater than 2"; it addresses a real issue that can be faced by users of these racks.

I am not asking for Ann Arbor to "reinvent the wheel" here; merely to adopt best practices painstakingly worked out by others. Every sentence in the Boston/APBP performance criteria has a reason for existing.

I do appreciate that the proposed ordinance explicitly and unambiguously prohibits "Wave", "Schoolyard", and "Wheelwell" racks. Again, however, I believe stronger and more-explicit encouragement toward use of designs known to be good (post-and-ring, inverted U / staple) would be beneficial, e.g. by pre-approving those designs while requiring planning-manager review for anything else.

Finally, if rack designs are intuitive, I wouldn't generally think that "signage to explain functionality" should be needed. Perhaps that provision should only apply to e.g. space-saving racks permitted in 5.19.7(A)(2).

Substitution of Class A Bike Parking for Class B/C

5.19.2(B)(3) currently states:

A higher class of parking space may be used to provide bicycle or electric vehicle parking facilities when more than one class is required by this section.

The proposed ordinance would not change this. **It should.** Class A bike parking serves a very different purpose from Class B/C; developers should not be permitted to provide *only* Class A parking. (That said, I would have no objection to providing Class B parking where Class C is otherwise required).

Space Saving Racks

5.19.7(A)(2) would state:

Of the total number of required bicycle parking spaces, up to one-third may be space saving design that do not meet the dimensional requirements of Table 5.19-7. The remaining two-thirds of required spaces must meet the dimensional requirements and must be ground level.

I'd suggest that this allowance should only be offered for Class A bike parking.

Statements of Intent

The proposed ordinance (as well as existing code) suggests that Class A parking is primarily intended for residents living in a building, while Class B parking is intended for parking at a place of employment. I'm concerned that this framing discounts the utility that Class A parking could also have at places of employment.

Ultimately I believe it may be better to re-frame this discussion around the length and regularity of a stay, instead of trying to tie different bike parking types to specific activities. To clarify what I mean by "regularity": when I worked at a job in downtown Ann Arbor for 8+ hours every weekday, I strongly preferred to have access to (secure) Class A bike parking. However, if I need to go spend a day at some other location on an ad-hoc basis, Class B bike parking would generally be fine!

Exempted Uses

I'm concerned about exempting "transportation facilities" from bicycle parking requirements in 5.19.7(E)(2) - it seems like bus and train stations are places in which bicycle parking could be in especially high demand! The same could also be said of parks.

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Again, thanks for all your work on this so far, and for your careful attention to these issues.

Regards,
Adam Goodman, Ward 5 resident