



May 18, 2026

California Building Standards Commission  
Attention: Public Comments  
2525 Natomas Park Drive, Suite 130  
Sacramento, CA 95833  
Via email: [CBSC@dgs.ca.gov](mailto:CBSC@dgs.ca.gov)

**Subject: Public Comment on Parts 1, 2, 9 & 10 of Title 24 code**

Dear Commission Members,

First 5 Alameda County (First 5) has a unique opportunity to expand and evolve the local early childhood system through two local ballot measures, the Oakland Children's Initiative, a City of Oakland parcel tax, and Measure C, an Alameda County sales tax supporting children's health and care. Collectively both measures will generate close to \$200 million annually for Alameda County's early care and education (ECE) system. As the administrator for the ECE portion of these funds, First 5 has an opportunity to build a stronger and more equitable ECE system in Alameda County.

In Alameda County, there is a significant need for investment and expansion in ECE licensed facilities. We estimate that the facilities cost to meet demand for licensed ECE child care in Alameda County is likely in the range of \$2 billion to \$4 billion. As outlined in the [Measure C 5-Year Plan](#), First 5 will invest approximately \$45 million over five years to retain, improve and expand early care and education (ECE) facilities, including supporting infant and toddler conversions, creating inclusive environments, and addressing urgent health and safety repairs.

We write today in support of the Child Care Center Workgroup proposals that improve clarity for providers and local fire officials and to request that the proposal include the alternative protection measures drafted by the Child Care Center Workgroup. These measures would provide flexibility for providers that would experience undue burden in meeting Group 1-4 safety requirements. **We respectfully request that the workgroup's full recommendations, including proposed changes to Chapter 1 and 4 of Title 22 be considered.**

We support ensuring facilities are safe and that infants and children are not put in harmful situations. However, many care facilities operate in older buildings where significant retrofitting would be cost-prohibitive. We urge consideration of reasonable alternatives where such options would not unduly jeopardize children's safety in the event of a fire.

We appreciate your consideration of these important recommendations. Thank you for your commitment to this work.

Sincerely,

A handwritten signature in blue ink that reads "Kristin Spanos".

Kristin Spanos  
Chief Executive Officer