

From: [Celine Krimston](#)
To: CBSC@DGS
Subject: California Building Standards Code (Title 24), specifically relating to Parts 1, 2, and 10.
Date: Monday, May 18, 2026 1:01:29 PM

CAUTION: This email originated from a NON-State email address. Do not click links or open attachments unless you are certain of the sender's authenticity.

To the California Building Standards Commission:

I want to thank you for the opportunity to submit public comments regarding the proposed changes to the Intervening Supplement to the 2025 California Building Standards Code (Title 24).

I am the President and CEO of Educational Enrichment Systems, Inc. (EES), a non-profit Title 5 early education agency that contracts with CDE and CDSS to operate 20 subsidized childcare centers serving children 0-5 years old in San Diego County.

While I wholeheartedly support the general intent of the Commission to ensure program safety, I have significant concerns regarding the proposed reclassification of a child care center from Group E (Educational) to Group I-4 (Institutional) when serving more than six children under 36 months of age.

While access to quality childcare is already limited and financially burdensome for many families, and access for the youngest children is even more challenging, the proposals I have reviewed would only make the situation significantly worse.

1. Impact on Child Care Capacity and Access

The financial burden of Group I-4 building standards will prevent child care centers like ours from using our full licensed capacity to serve infants. Strict I-4 requirements are cost prohibitive for childcare programs and will exacerbate the shortage of infant care slots. Throughout California there is already a huge gap between the number of children who meet eligibility criteria for publicly funded child care programs and those currently served. Per the most 2025-2026 San Diego County Zip Code Priority Report (published by the San Diego County Child Care and Development Planning Council) approximately 82% of eligible infants and toddlers are not receiving publicly funded care because of the exorbitant cost to child care providers to serve this population. The increased cost of I-4 building standards will only exacerbate the infant care access crisis.

2. Prohibitive Costs of "Change of Occupancy" Requirements

Current code interpretations often require a "change of occupancy" designation to move from Group E to Group I-4. This new designation has several high-cost requirements, including the installation of smoke barriers and one-hour fire-resistive wall ratings. Also, under Title 24, Part 9, local fire officials may require full automatic fire sprinkler systems for any occupancy change deemed "more hazardous." Child care programs like EES already operate on very slim margins. I am very concerned that the cost to retrofit facilities per Group I-4 requirements will result in mass facilities closures further limiting working family access to infant and toddler care.

3. Recommendation for Workable Solutions

I urge the Commission to consider more flexible amendments that maintain high safety standards without the prohibitive costs of full institutional reclassification. The Commission should create a child care carve out for childcare centers that meet specific enhanced E-occupancy safety measures. Moreover, the Commission should align the building code age definitions with licensing definitions to avoid confusion and ensure cohesive interpretation and implementation of safety standards across the state. The Commission has the opportunity to support both child safety and the expansion of much-needed infant and toddler care slots.

We as leaders, should have our entities working together to improve access and affordability so parents have greater access to high-quality, affordable childcare.

Thank you for your time and for your consideration of these comments.

Have a peaceful day.

Celine Krimston (she, her, hers)

President and CEO

Educational Enrichment Systems, Inc

9620 Chesapeake Dr., Suite 205

San Diego, CA 92123

Phone: 858-569-7273 ext 111

Fax: 858-569-7280

celine@educ-enrichment.org

www.educ-enrichment.org

My working day may not be your working day. Please do not feel obliged to reply to this email outside your normal working hours.