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**To:** [CBSC@DGS](mailto:CBSC@DGS)  
**Subject:** public comment  
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**Attachments:** [image001.png](#)

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California Building Standards Commission  
Attention: Public Comments  
2525 Natomas Park Dr., Ste. 130  
Sacramento, CA 95833  
Email: [cbsc@dgs.ca.gov](mailto:cbsc@dgs.ca.gov)

May 18, 2026

Dear California Building Standards Commission,

I am reaching out on behalf of First 5 Napa County. Our organization supports child care centers through funding, dvocacy, and early childhood resources that help programs provide high-quality care and learning environments for young children.

We have serious concerns about these proposed changes, and how they will negatively impact child care centers in California - threatening them from staying open and providing quality care for children while families are in work or school.

Licensed centers already run highly supervised environments with strict ratios and established emergency procedures. Additional structural requirements don't appear proportionate to the safety benefit, but they do create real barriers to staying open.

We respectfully submit that four areas need the most attention:

**1. Clearer Classification Language**

We urge the Commission to adopt clearer, more specific classification language for child care facilities. Current ambiguity leaves providers uncertain whether their program will be reclassified, which directly affects compliance costs and feasibility. Clear definitions that are aligned with how child care centers *actually operate* are essential before any new requirements take effect. We support the Child Care Center Workgroup proposals that improve clarity for providers and local fire officials.

## 2. Flexibility for Existing Buildings

Existing child care facilities *should not be held* to the same structural standards as new construction. Many providers operate in leased or repurposed buildings where full retrofitting is financially and physically impractical. We urge the Commission to include flexibility provisions for existing facilities so that compliance pathways are realistic and do not force closures.

## 3. Recognize Existing Safety Practices

Child care programs *already meet* rigorous licensing standards, including staff-to-child ratios, active supervision, and emergency preparedness protocols. We urge the Commission to recognize these existing safety practices when evaluating new requirements, and to allow providers to meet the intent of the code through operational measures where structural changes would not produce a meaningful safety benefit. Alignment of Title 22 and 24 will remove conflicts, reduce confusion and provide flexibility.

## 4. Funding Support for Compliance

If the Commission moves forward with new requirements, dedicated funding support *must be* part of the implementation. Small and community-based child care providers cannot absorb significant retrofit or reclassification costs without state investment. Without funding alongside any new mandate, these changes will accelerate closures in an already fragile sector.

We respectfully request that the Child Care Center Workgroup's recommendations, including proposed changes to Chapter 1 and 4 of Title 22 be considered.

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

Sincerely,  
Ashley Walker

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**Ashley Walker** *(she/her/hers)*

**Executive Director**

**First 5 Napa County**

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