

Bumbalov, Stoyan@DGS

From: Cathy Vaughn <cathy@montessorisonoma.com>
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MONTESSORI SCHOOL OF SONOMA
19675 8TH ST E
SONOMA CA 95476
707 996-2422

April 27, 2026

California Building Standards Commission
Attention: Public Comments
2525 Natomas Park Drive, Suite 130
Sacramento, CA 95833

Existing childcare facilities play a vital role in our communities and should not be held to the same structural standards as new construction. Many providers operate in leased or repurposed spaces where full retrofitting is not financially or physically feasible. I respectfully encourage the Commission to include flexible options for existing facilities so that compliance is achievable and does not unintentionally lead to program closures.

Childcare programs already follow strong licensing standards, including appropriate staff-to-child ratios, active supervision, and clear emergency preparedness protocols. I encourage the Commission to take these established safety practices into account when considering new requirements, and to allow providers to meet the intent of the code through operational approaches when structural changes would not meaningfully improve safety.

If new requirements move forward, it will be important to pair them with dedicated funding support. Small and community-based childcare providers often operate on tight margins and cannot absorb significant retrofit or reclassification costs without state investment. Without funding alongside new mandates, there is a real risk that these changes could accelerate closures in a sector that is already under strain.

Thank you for your consideration.

Cathy Vaughn
Director