

**From:** [Erika Lubensky](#)  
**To:** [CBSC@DGS](mailto:CBSC@DGS)  
**Subject:** Public Comment  
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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)

Dear Commission Members,

For 47 years, Community Resources for Children (CRC) has served as a trusted hub for families, caregivers, and early educators in Napa County, providing high-quality resources and programs that support family well-being and child development. CRC also supports child care providers through training, professional development, coaching, and guidance on licensing and business development.

On behalf of the families and providers we serve, we write to express serious concerns regarding the proposed changes to Title 24 and their impact on existing and future child care facilities. These changes are likely to impose significant operational and financial burdens on a sector already facing workforce shortages and financial instability. Providers serving infants are particularly vulnerable, as they may face substantial infrastructure costs without sufficient funding, alongside reduced enrollment and revenue losses.

We respectfully urge the Commission to consider the following:

1. **Clarify classification language** to ensure child care providers can clearly determine whether they will be reclassified and can plan for associated costs and operational impacts, including assessing long-term viability.
2. **Allow flexibility for existing facilities**, particularly those in leased or repurposed buildings, by avoiding requirements for full retrofits that are financially unfeasible. For example, sprinkler installation alone may exceed \$100,000 for a small center—costs child care providers cannot absorb.
3. **Recognize existing safety standards** met through licensing requirements (e.g., staff-to-child ratios, supervision, nap protocols, and emergency preparedness) and allow operational practices to meet code intent when structural modifications are impractical or cost-prohibitive.
4. **Reduce infant capacity** - some interpretations of the proposed standards limit infant classroom capacity, contributing to reduced enrollment opportunities for families and worsening California's infant care shortage. The new standard shouldn't hurt working families, pushing them away from participating in the workforce.
5. **Provide dedicated and on-going funding for compliance** to prevent further strain and potential closures in an already limited child care system.

California's child care providers cannot absorb the scale of these proposed costs without sustained state investment. Absent such support, these changes will likely lead to program

closures, limiting families' ability to work and adversely affecting the economies of communities across the State of California.

Thank you,

**Erika Lubensky**

*Executive Director*

*Pronouns: She/Her/ella*

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