

From: [Sunrise Montessori School](#)
To: [CBSC@DGS](#)
Subject: Regarding Title 24 Building Standards Code - Public Comment
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To the California Building Standards Commission

Regarding Code changes headed for the Intervening Supplement to the 2025 California Building Standards Code, Title 24. The publication of which is scheduled for January 1, 2027, with an effective date of July 1, 2027.

As a longtime owner of a licensed Child Care Facility in the State of California and a renter of the facility where I run my preschool, I find the proposed changes that are regarding fire mitigation unreasonable and unactionable. Our center is small, housed in a former house, and between Community Care Licensing's rules and the Fire Marshal's inspection each year, we already are in great shape for fire safety. My business and my landlord do not have the funds needed to install more industrial types of fire safety apparatus.

We, as licensed facilities, are already regulated and are at a higher level of compliance in our general and specific safety requirements in our fiscal plants than the area's unified school districts. Also my particular site is so small that leaving the premises safely with our students after contacting the local fire fighters would be quicker and less damaging to our building than having a myriad of sprinklers deploying onto all of our teaching materials. The local Fire Chief even said: "Don't use the extinguisher, gather the children, leave and call us." The nearest Fire Department location is literally 3 minutes away.

If required to install any apparatus, the state should assist in paying the cost of installation.

California's almost 36,000 licensed child cares are already reeling to stay afloat due to the detrimental single provider Transitional Kindergarten

directives that are impacting our livelihoods and the success of the state's children.

Following local Fire orders and current State licensing rules should be more than satisfactory to keep the students safe from fire.

Please consider these ideas from CQEL in forming your recommendations or new rules. See below:

Where CQEL Stands

The proposed Title 24 changes raise serious concerns for the childcare sector.

For operators, this is another significant hit to an already strained industry. Reclassification and retrofit costs are not realistic for most programs. They are not expenses that community-based centers can absorb.

There's also a clear disconnect from how childcare actually operates. 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.

The longer-term risk is reduced capacity, delayed growth, and closures.

Four areas need the most attention. Sample comment language is included under each.

1. Clearer Classification Language

Ambiguity in how childcare facilities are classified creates confusion, inconsistent enforcement, and unexpected compliance costs. Providers need to plainly know what category their center falls into and what's required of them.

"I urge the Commission to adopt clearer, more specific classification language for childcare 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 childcare centers actually operate are essential before any new requirements take effect."

2. Flexibility for Existing Buildings

Most licensed centers operate in buildings that were never purpose-built for childcare. Applying new construction standards retroactively to existing facilities isn't realistic and will push centers toward closure rather than compliance.

"Existing childcare 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. I 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

Childcare centers already operate under some of the strictest oversight in the state — low staff-to-child ratios, constant supervision, and required emergency procedures. New code requirements should account for these existing safeguards rather than treat childcare facilities as if they operate without them.

"Childcare programs already meet rigorous licensing standards, including staff-to-child ratios, active supervision, and emergency preparedness protocols. I 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."

4. Funding Support for Compliance

If the state determines these changes are necessary, the cost cannot fall entirely on providers, particularly small, community-based centers already operating on razor-thin margins. Mandates without funding are a path to closure.

"If the Commission moves forward with new requirements, dedicated funding support must be part of the implementation. Small and community-based childcare 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."

Thank you,
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