

**From:** [OFS Bayview](#)  
**To:** [CBSC@DGS](mailto:CBSC@DGS)  
**Subject:** Public Comment: 2025 Intervening Code Adoption Cycle – Title 24 Preschool & Childcare Impacts  
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Dear California Building Standards Commission,

My name is Jackie Buhl and I am the owner and Executive Director of 5 preschools in the San Francisco Bay Area. I am writing to submit formal public comment regarding the proposed changes to the **Intervening Supplement to the 2025 California Building Standards Code, Title 24**. As the state considers these updates, I urge the Commission to recognize that the childcare sector is already in a state of crisis. New structural mandates, while well-intentioned, often create insurmountable financial barriers for community-based providers. This further puts at risk an essential service for working families in the state of California.

To ensure these codes are both effective and sustainable, I urge the Commission to consider the following during your deliberations:

### 1. Flexibility for Existing Buildings

Most licensed centers operate in leased or repurposed buildings that were not originally purpose-built for childcare. Retroactively applying new construction standards to these facilities is often physically and financially impossible.

**Our Ask:** Include "flexibility provisions" or "grandfathering" clauses for existing facilities. Compliance pathways must be realistic so that providers aren't forced to close due to impractical structural mandates.

### 2. Recognition of Existing Safety Practices

Childcare centers are already among the most strictly regulated environments in the state. Our low staff-to-child ratios and constant supervision provide a level of safety that should be accounted for in the fire code.

**Our Ask:** Recognize these rigorous licensing standards and allow providers to meet the intent of the code through **operational measures** rather than requiring structural changes that may not offer a meaningful safety benefit beyond what is already achieved through active supervision.

### 3. Funding Support for Compliance

Mandates without funding are a direct path to closure, particularly for small, community-based centers operating on razor-thin margins. The burden of state-level changes should not fall solely on the shoulders of individual providers.

**Our Ask:** If the Commission moves forward with these requirements, dedicated state funding must be part of the implementation. We must ensure that safety

improvements do not come at the cost of losing vital childcare seats in an already fragile sector.

The effective date of July 1, 2027, will be here quickly. Without these common-sense protections, California risks a further reduction in childcare capacity that families simply cannot afford.

Thank you for your time and for considering the unique needs of the childcare industry.

Sincerely,

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