

**From:** [Judy Haus](#)  
**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,

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.

I strongly advocate for the following four considerations to be integrated into the final code supplement:

- **Clearer Classification Language:** Current ambiguity in how childcare facilities are categorized leads to inconsistent enforcement and "sticker shock" compliance costs. We need precise definitions aligned with actual childcare operations to ensure providers can accurately predict and manage their facilities.
- **Flexibility for Existing Buildings:** Most licensed centers operate in leased or repurposed spaces not originally built for childcare. Applying new construction standards retroactively is often physically impossible or financially ruinous. I urge the Commission to include realistic compliance pathways for existing facilities that do not force closures.
- **Recognition of Existing Safety Practices:** Childcare centers already meet rigorous licensing standards, including strict staff-to-child ratios and active supervision. The code should allow for operational measures (such as these existing protocols) to meet safety intents where structural changes do not offer a proportionate benefit.
- **Funding Support for Compliance:** Mandates without funding are a path to closure. If the Commission moves forward with significant new requirements, the state must provide dedicated investment to help small, community-based providers absorb these costs.

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,

Judy Haus, Program Director Old Firehouse School Walnut Creek

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