



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)

Re: Public Comment on Parts 1, 2, 9 & 10 of Title 24 code

Dear Commission Members,

The Low Income Investment Fund (LIIF) is a national community development financial institution (CDFI) with a mission that everyone in the United States should benefit from living in a community of opportunity, equity, and wellbeing. LIIF is an established trusted partner for ECE practitioners, government, philanthropy, community organizations, and policymakers. Since 1999, LIIF has provided more than \$660 million in grants and loans that increase access to child care for families and improve the businesses they rely on for care, impacting 420,000 children nationwide.

In California, LIIF has had the honor of stewarding over \$350 million for state child care facilities grants in partnership with the California Department of Social Services. It is through this work that we have observed how changes to the 2019 Title 24 building and fire codes have inadvertently harmed child care expansion and quality improvement projects and burden providers with unplanned, expensive upgrades. We write today in support of the Child Care Center Workgroup proposals that improve clarity for providers and local fire officials.

These proposals include:

- Defining an infant as a person under 2 years of age rather than describing them as non-ambulatory.
- Aligning Title 22 and 24 to remove conflicts and correlate Title 24 Part 9 Section 203 with Part 2 Chapter 3.

However, the current proposal to the Building Standards Commission does not include the alternative protection measures drafted by the Child Care Center Workgroup. These measures would provide flexibility for providers that would experience undue burden in meeting Group I-4 safety requirements, including a process for appeals. We respectfully request that the workgroup's full recommendations, including proposed changes to Chapter 1 and 4 of Title 22 be considered.

We appreciate your consideration of these important recommendations. Thank you for your commitment to this work.

Sincerely,

A handwritten signature in black ink that reads "Shelly Masur". The signature is written in a cursive style with a prominent loop at the end of the name.

Dr. Shelly Masur  
Vice President, Advisory & State Policy