

---

# AB 176 CHILD CARE CENTER WORK GROUP

## Meeting Minutes – Friday, June 13, 2025

---



### Work Group Leadership

Crystal Sujeski, CAL FIRE – Office of the State Fire Marshal, CDA-DC, Chair  
Lya Johnson, DSS – CCL, Licensing Program Manager III, Co-Chair

### CAL FIRE – OSFM Support

Jena Garcia, OSFM-CDA Supv.

*\* Attendance is recorded. Attendance Log is available upon request.*

## 1. CALL TO ORDER 8:30 AM

- A. Welcome/Introductions
- B. Agenda/Minutes Reviewed
  - i. Review how to access and subscribe for OSFM Work Group notifications and emails.
    - 1. [Workgroups | OSFM](#)
    - 2. [Subscribe to Newsletter | OSFM](#)

**Lya Johnson**  
**Crystal Sujeski**

## 2. OLD BUSINESS –

- A. Sub-Work Group – interest/sign-up poll posted/reviewed.
  - i. Definitions-
  - ii. Occupancy Classifications –
  - iii. Chapter 4
  - iv. Mitigating Factors
  - v. 850 Form – Revision/Processes

**Sujeski/Johnson**

## 3. NEW BUSINESS

- A. Gaby Manzo – Occupancy Classification E/ I-4 Summary – Presented
- B. Side-by-side Code Comparison – Update
  - i. J. Garcia – Revisions still pending.
- C. Sub-Work Groups Topics – General Overview
  - i. Definitions-
    - 1. Code Comparison - Title 22 & 24 Alignment, & HSC
      - a. Day Care vs Child Care
      - b. Ages
        - i. Toddler, infant, preschool ages - preschool license goes from 24 months to the entry into school, but now, because of this toddler definition going to 36 months, there's overlap.
  - ii. Occupancy Classifications – Gaby Manzo/Melanee Cottrill
    - 1. Code Comparison - Title 22 & 24 Alignment, & HSC
      - a. E vs I-4
  - iii. 850 Form – Revision/Processes

**Sujeski/Johnson**

1. Code Comparison - Title 22 & 24 Alignment, & HSC
- iv. Chapter 4
  1. Code Comparison - Title 22 & 24 Alignment, & HSC
    - a. Egress Requirements
    - b. Fire protection system Requirements
- v. Mitigating Factors – further research needed to support.
  1. What are those alternate means being applied out there.

#### **4. ROUNDTABLE / PUBLIC COMMENT**

**Crystal Sujeski**

- A. Leslie Wang – Clarification and awareness pertaining to [IB 24-012](#)
- B. Tara Gray – Concerned that the IB 24-012 needs to be revisited so that items are put in bold to stand out for clarification.
- C. Travis Thompson – For awareness for the group - Unless specifically called out (ie. IB 24-012 per AB 176), Title 24 is not retroactive and only triggered if something type of construction is happening or if there's an occupancy change or a use change.
- D. Ian Hardage – Does a “Change of ownership or renewing a license” and now that existing facility is required to comply with current code, such as requiring fire sprinklers?
  - i. Lya Johnson – A change in capacity requires a “new” fire clearance but it’s not a “new” license at an existing facility.
  - ii. Ian Hardage – Capacity component of the 850 fire clearance should identify “up to” to identify capacity limitation thresholds.
    1. Lya Johnson – Updates to the 850 fire clearance with consider this.
- E. Erica Gonzales – How do I know what we need to do to increase capacity?
  - i. Crystal Sujeski – You need to work with the local authority having jurisdiction to confirm the requirements.
  - ii. Melanee Cottrill – A lot of input that may be outside the prevue of the work group. Suggested another meeting/platform for provider to as questions.
  - iii. Crystal Sujeski – The input is valuable and helps identify where the problems are. Redirected folks to send questions to the Code Development and Analysis general inbox. [CodeDevelopment@fire.ca.gov](mailto:CodeDevelopment@fire.ca.gov)
- F. Ernesto – Applauded SFM and their efforts with regard to IB 24-012. Interest in utilizing baby gates and concern with increased toilet capacity.
  - i. Crystal Sujeski – You need to work with your local fire code official and a design professional.
- G. Carolyn – Concern about code application inconsistency across Cities and County jurisdictions.

#### **5. UPCOMING MEETING DATE FOR 2024**

**Crystal Sujeski**

- A. Second Friday of each month starts at 8:30 AM and ends at 10 AM.
  - i. Next Meeting – July 11, 2025, 8:30-10 AM
  - ii. Requested agenda items from participants to be reported to [jena.garcia@fire.ca.gov](mailto:jena.garcia@fire.ca.gov)

#### **7. MEETING ADJOURNED 10:00 AM**

**Crystal Sujeski**

If you would like to watch the recording of this meeting, please visit the link below:

<https://youtu.be/mGKDB-lbmV8>