

**ATTACHMENT A -
CALIFORNIA HEALTH AND
SAFETY CODE
SECTION 17958 EXPRESS FINDINGS**

EXPRESS FINDINGS

FOR COUNTY OF SAN DIEGO AMENDMENTS
TO THE 2019 CALIFORNIA BUILDING STANDARDS CODE

As required by Health and Safety Code section 17958.7, the San Diego County Board of Supervisors makes express findings that amendments to the California Building Standards Code are reasonably necessary for the protection of the public health, safety and welfare due to certain climatic, geological or topographical conditions existing in the County of San Diego.

The following matrix lists the County amendments to state building standards and the corresponding express findings. The full text of the proposed County amendments to the California Building Standards Code is provided in Attachment C.

MATRIX OF EXPRESS FINDINGS		
California Building Code Amendments		
SECTION	ADDITION, DELETION, OR AMENDMENT	EXPRESS FINDING NUMBER(S)
104.10.1 Modifications in flood hazard areas	Addition	1
105.2 Work exempt from permit	Amendment	2
105.10 Flood Hazard Report	Addition	16
701A Scope and application	Amendment	2
702A Definitions	Amendment	2
703A Standards of quality	Amendment	2
704A Reserved	Deletion	2
705A Roofing	Amendment	2
706A Vents and eave construction	Amendment	2
707A Exterior walls	Amendment	2
708A Exterior windows and doors	Amendment	2
709A Decking, carports, patio covers and other building appendages	Amendment	2
710A Reserved	Deletion	2
711A Insulation	Addition	2
712A Fences and other structures less than five feet from a building	Addition	2
1505.1 Roof fire classification -- General	Amendment	2
1505.2 Roof assembly listing	Amendment	2
3109.3 Swimming pools – Swimming pool construction permit; safety features required	Amendment	3
3109.4 Swimming pools – Enclosure; required characteristics	Amendment	3

ATTACHMENT A

3109.5 Swimming pools – Barriers and safety features for existing swimming pools	Addition	3
3120 Solar- and electric vehicle-capable buildings	Addition	4, 5
3410 Moved structures	Addition	6
APPI Appendix I Patio covers	Amendment	7

California Residential Code Amendments		
SECTION	ADDITION, DELETION, OR AMENDMENT	EXPRESS FINDING NUMBER(S)
R301.2 Climatic and geographic design criteria	Amendment	8
R302.6 Dwelling-garage and/or carport fire separation	Amendment	9, 10, 11
R303.9 Required heating	Amendment	12
R309.6 Fire sprinklers	Amendment	9, 10, 11
R311.1 Means of egress	Amendment	2, 9, 10, 11, 13
R311.2 Doors	Amendment	2, 9, 10, 11, 13
R311.3 Floors and landings at doors	Amendment	2, 9, 10, 11, 13
R311.4 Vertical egress	Amendment	2, 9, 10, 11, 13
R313 Automatic fire sprinkler systems	Amendment	9, 10, 11
R332 Solar- and electric vehicle-capable buildings	Addition	4, 5
R337 Materials and construction methods for exterior wildfire exposure	Amendment	2
R902 Roof classification	Amendment	2
RAPPH Appendix H Patio covers	Amendment	7

California Plumbing Code Amendments		
SECTION	ADDITION, DELETION, OR AMENDMENT	EXPRESS FINDING NUMBER(S)
713.1 Sewer connection required	Amendment	14
713.2 On-site wastewater treatment system	Amendment	14
713.3 Graywater system	Amendment	14

California Green Building Standards Code Amendments		
SECTION	ADDITION, DELETION, OR AMENDMENT	EXPRESS FINDING NUMBER(S)
4.303.1.4.4 Kitchen faucets	Amendment	15
4.303.3 Appliances	Addition	15

Express Findings

Finding 1

This amendment is reasonably necessary due to local climatic, geological, and topographical conditions. The County of San Diego includes areas at risk of alluvial fan flooding after precipitation in local mountains. The amendment criteria ensure qualifying structures located on alluvial fans remain safe and functional during flood events and do not divert flood water and debris to negatively affect other properties and structures. This amendment was recommended by the Federal Emergency Management Agency and is necessary as emergency standards to protect health and safety.

Finding 2

This amendment is reasonably necessary due to local climatic and topographical conditions and is substantially equivalent to changes or modifications that were previously filed by the County and were in effect as of September 30, 2025. The County of San Diego's seasonally hot and dry weather, coupled with strong Santa Ana winds, frequently results in wildfires creating substantial risk to lives and property. The threat of these fires expanding rapidly is acute, particularly in large areas of the County with steep terrain and/or dense vegetation.

The County's recent history includes the following structural losses due to wildfires:

- Harmony Grove Fire, 1996: 122 structures destroyed
- Gavilan Fire, 2002: 43 homes destroyed
- Cedar and Paradise Firestorms, 2003: 2,684 homes destroyed
- Witch, Harris, Rice and Poomacha Fires, 2007: Approximately 1,200 homes and 1,100 accessory structures destroyed
- Cocos Fire, 2014: 34 homes destroyed
- Lilac Fire, 2017: 114 homes destroyed

Ignition of these structures has been attributed to direct flame exposure, embers entering concealed spaces through vents and failed glazing, and wind-swept burning brands and radiant heat spreading from both adjacent and distant fire-involved structures.

The likelihood of a structure surviving exposure to wildfire conditions is a direct function of that structure's ignition resistance. Moreover, the potential for one burning structure to spread to others jeopardizes public safety and strains firefighting resources. Considering the existing and future development located in County areas prone to

significant wildfire activity and risk, it is prudent to ensure construction in these areas is as ignition-resistant as reasonably possible.

Finding 3

This amendment is reasonably necessary due to local climatic conditions and is substantially equivalent to changes or modifications that were previously filed by the County and were in effect as of September 30, 2025. The County of San Diego’s relatively warm climate makes outdoor swimming pools and spas a popular feature for one- and two-family residential construction. The high density of one- and two-family homes with a swimming pool and/or spa in the County presents a drowning risk for both small children living in a home with an accessory swimming pool and/or spa and small children living in a home neighboring a property with a swimming pool and/or spa. Strengthened pool safety measures addressing both scenarios mitigate that risk.

Finding 4

This amendment is reasonably necessary due to local climatic conditions substantially equivalent to changes or modifications that were previously filed by the County and were in effect as of September 30, 2025. Reducing greenhouse gas emissions in the County of San Diego, in part, requires transition to renewable energy sources. The County’s relatively sunny climate is ideal for power generation by roof-mounted solar photovoltaic systems.

Simple, cost-effective measures incorporated into the construction of a new dwelling unit enable a more straightforward and less invasive installation of a future roof-mounted solar photovoltaic system. Code provisions requiring these accommodations encourage homeowners to consider solar photovoltaic systems and remove barriers to the affordable installation of such systems.

Finding 5

This amendment is reasonably necessary due to local climatic conditions and is substantially equivalent to changes or modifications that were previously filed by the County and were in effect as of September 30, 2025. Reducing greenhouse gas emissions in the County of San Diego, in part, requires transition to renewable energy sources. The unincorporated County’s population (roughly 500,000 people) and geographic area (3,572 square miles) combine to generate a substantial number of trips – many over long distances – in combustion-engine vehicles. Completing these trips instead in electric vehicles offers significant potential reduction in greenhouse gas emissions.

Simple, cost-effective measures incorporated into the construction of a residential garage enable a more straightforward and less invasive installation of a future electric vehicle charging system. Code provisions requiring these accommodations encourage homeowners to consider electric vehicles and remove barriers to the affordable installation of electric vehicle charging systems.

Finding 6

This amendment is reasonably necessary due to local climatic conditions and is substantially equivalent to changes or modifications that were previously filed by the County and were in effect as of September 30, 2025. Reducing greenhouse gas emissions in the County of San Diego, in part, requires recycling and re-use of materials. Allowing moved residential buildings to retain their existing materials and methods of construction – provided the structures are not substandard and the foundations comply with current codes – prolongs the use of such buildings and reduces construction material requirements.

Finding 7

This amendment is reasonably necessary due to local climatic conditions. The County of San Diego’s relatively warm and sunny climate makes patio covers a popular feature for one- and two-family residential construction. Additional code provisions specific to patio covers ensure uniform code application, design loads consistent with the requirements for other residential structures, and sufficient light, ventilation, and emergency egress from any adjacent interior spaces.

Finding 8

This amendment is reasonably necessary due to local climatic, geological and topographical conditions and is substantially equivalent to changes or modifications that were previously filed by the County and were in effect as of September 30, 2025. The table entries specify additional design criteria appropriate for the County of San Diego as directed in California Residential Code R301.2.

Finding 9

This amendment is reasonably necessary due to local climatic and topographical conditions and is substantially equivalent to changes or modifications that were previously filed by the County and were in effect as of September 30, 2025. The

County of San Diego finds that flood conditions carry the potential for overcoming the ability of the fire department to aid or assist in fire control, evacuations, rescues and the emergency task demands inherent in such situations. The potential for flooding conditions result in limiting fire department emergency vehicular traffic, overtaxing fire department personnel, and causing a substantial or total lack of protection against fire for the buildings and structures located within the jurisdiction.

Finding 10

This amendment is reasonably necessary due to local topographical conditions and is substantially equivalent to changes or modifications that were previously filed by the County and were in effect as of September 30, 2025. Much of the rural area of the County of San Diego is a mountainous topography and lacks the infrastructure needed for water supply (fire flow) and experiences water shortages from time to time. Those conditions have an adverse effect on water availability for firefighting. Fires starting in sprinklered buildings are typically controlled by one or two sprinkler heads, flowing as little as 13 gallons per minute.

Hose streams used by engine companies on well-established structure fires operate at about 250 gallons per minute each, and the estimated water need for a typical residential fire is 1,250 to 1,500 gallons per minute, according to the Insurance Service Office and the International Fire Code.

Under circumstances such as, lack of water infrastructure, earthquakes, multiple fires and wildland fires within a community, the limited water demands needs of residential fire sprinklers would control and extinguish many fires before they spread from building to wildland. In such a disaster, water demands needed for conflagration firefighting probably would not be available.

Finding 11

This amendment is reasonably necessary due to local topographical conditions and is substantially equivalent to changes or modifications that were previously filed by the County and were in effect as of September 30, 2025. The topography of the County of San Diego presents problems in delivery of emergency services, including fire protection. Hilly terrain has narrow, winding roads with little circulation, preventing rapid access and orderly evacuation. Much of these hills are covered with highly combustible natural vegetation. In addition to access and evacuation problems, the terrain makes delivery of water extremely difficult. Some hill areas are served by water pump systems subject to failure in fire, high winds, earthquake and other power failure situations. This would only allow domestic gravity feed water from tanks and not enough water for firefighting.

Finding 12

This amendment is reasonably necessary due to local climatic conditions and is substantially equivalent to changes or modifications that were previously filed by the County and were in effect as of September 30, 2025. Historical weather data confirms all portions of the County of San Diego have experienced temperatures below 60°F, requiring permanent heating facilities in all dwelling units according to the California Residential Code.

Finding 13

This amendment is reasonably necessary due to local geological conditions and is substantially equivalent to changes or modifications that were previously filed by the County and were in effect as of September 30, 2025. The County of San Diego is situated near three major faults – Rose Canyon, Elsinore, and Agua Caliente – each capable of generating earthquakes of significant magnitude. The County is particularly vulnerable to devastation should such an earthquake occur.

The potential effects of earthquake activity include isolating portions of the County from emergency response by restricting or prohibiting surface travel due to collapsed transportation infrastructure and earth slides.

Finding 14

This amendment is reasonably necessary due to local topographical conditions and is substantially equivalent to changes or modifications that were previously filed by the County and were in effect as of September 30, 2025. The size and terrain of the County of San Diego make public sewer system connection unavailable or infeasible in some areas, requiring projects in these areas to connect to on-site wastewater treatment systems.

Finding 15

This amendment is reasonably necessary due to local climatic conditions and is substantially equivalent to changes or modifications that were previously filed by the County and were in effect as of September 30, 2025. The County of San Diego annually experiences extended periods with little or no precipitation, requiring substantial import of water from Northern California and the Colorado River to meet local water demands. Code provisions requiring water-efficient kitchen faucets and appliances in new residential construction reduce indoor water use.

Finding 16

This amendment, while required for the County's continued participation in Federal Emergency Management Agency's National Flood Insurance Program and Community Rating System Programs, is imperative for protecting public safety due to the County's extremely unique flood risk due to our climate, geology, and topography which, in concert, cause extremely hazardous flood conditions often times exacerbated by wildfire. These changes or modifications necessary as emergency standards to protect health and safety.