

California Health and Safety Code Section 13869.7 Findings

**FINDINGS FOR REVISION OF THE COUNTY OF SAN DIEGO
AMENDMENTS TO THE 2025 CALIFORNIA FIRE CODE, CALIFORNIA CODE OF
REGULATIONS, TITLE 24, PART 9**

As required by California Health and Safety Code sections 13869.7, 17958.7, and 18941.5, the San Diego County Fire Protection District Board of Directors does herewith make express findings that amendments to the California Building Standards Code are necessary for the protection of the public health, safety and welfare due to certain climatic, topographic or geological features existing in the unincorporated areas of San Diego County.

The following matrix lists the amendments and the corresponding express findings. As in the past, the matrix lists only those amendments that are new for 2026 and does not repeat earlier findings for amendments that have carried over from the 2023 County of San Diego Fire Code. Those earlier findings still stand and are incorporated by reference. Also, minor editorial changes or typographical corrections are not shown in these findings. The full text of the proposed amendments to the California Building Standards Code are shown in the Attachment D.

MATRIX OF FINDINGS			
Fire Code Amendments			
SECTION	CHAPTER	PAGE NUMBER	FINDING NUMBER(S)
104.2.2.5	Technical Study BESS	15	All
104.2.4	Modifications	16	All
104.2.4.1	Individual Cases	16	All
202	Definitions	21	All
326	Storage of Firewood	29	All
503.1.2	Additional Access	31	All
503.1.2	Secondary Access	31	All
507.2.2	Waterline Extensions	40	All
507.2.3	Water Tanks	40	All
903.2	Automatic Sprinkler Systems	43	All
903.2.(b)	Remodels/Reconstruction	44	All
903.2.(c)	Group U Occupancies	44	All
903.2.(d)	Groups R & U Occupancies with ESS	44	All
1205.5.5.1	Fire Apparatus Access Roads	49	All
1205.5.3	Fuel Modification	49	All
Chapter 49	Wildland Urban Interface	53	All
5705.2.4	Transferring Class Liquids	53	All
6107.5	Safety Precaution LPG Tanks	58	All
B103.3	Areas Without Water Supply Systems	58	All

Findings for the Fire Code

Finding 1

The San Diego County Fire Protection District herewith make findings 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 results in limiting fire department emergency vehicular traffic, with resulting overtaxing fire department personnel, may further cause a substantial or total lack of protection against fire for the buildings and structures located within the jurisdiction.

Finding 2

The San Diego County Fire Protection District is situated near three major faults, each capable of generating earthquakes of significant magnitude. These are the Rose Canyon Fault, the Elsinore Fault, and the Agua Caliente Fault. These faults are subject to becoming active at any time; the County of San Diego is particularly vulnerable to devastation should such an earthquake occur.

The potential effects of earthquake activity include isolating certain areas of San Diego County Fire Protection District from the surrounding area and restricting or eliminating internal circulation due to the potential for collapsing of highway overpasses and underpasses, along with other bridges in the area, or an earth slide, and the potential for vertical movement rendering surface travel unduly burdensome or impossible.

Finding 3

The San Diego County Fire Protection District includes several highways. These highways are heavily traveled by transportation vehicles carrying known toxic, flammable, explosive and hazardous materials. The potential for release or threatened release of a hazardous material along this route and others within the County is likely given the volume transported daily. Incidents of this nature will normally require all available emergency response personnel to prevent injury and loss of life and to prevent, as far as practicable, property loss. Emergency personnel responding to such aforementioned incidents may be unduly impeded and delayed in accomplishing an emergency response as a result of this situation. With the potential result of undue and unnecessary risk to the protection of life and public safety and, in particular, endangering residents and occupants in buildings or structures without the protection of automatic fire sprinklers.

Finding 4

Much of the rural area of the San Diego County Fire Protection District 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 severely 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 2022 California 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 5

The topography of San Diego County Fire Protection District presents problems in delivery of emergency services, including fire protection. Hilly terrain has narrow, winding roads with very 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 6

Due to the mountainous topography in much of the rural area of the San Diego County Fire Protection District, roadway condition, gates, angle of approach or departure, steeply sloping roadways and grades are common. It is very important that roadways be named and identified in order to facilitate emergency response

Finding 7

Due to the mountainous topography in much of the rural area of San Diego County Fire Protection District, steep, narrow and winding roads and areas of heavy brush are common. These features make it difficult for emergency response personnel to easily and quickly find the location of the site that requires assistance. It is therefore essential that street numbers and signs be easily readable to ensure the quickest response times for a given location.

Finding 8

Due to access and mountainous topography in much of the San Diego County Fire Protection District, difficult roadway conditions, gates, angle of approach or departure, steeply sloping roadways and grades are common. In addition, combining potentially severe rainstorms and ground water retention of many areas of the County, where there is expansive soil. This produces a condition wherein the moisture content of the soil is sufficient that roadways become damaged due to soil expansion and shrinkage. All weather, paved surfaces capable of supporting the imposed loads of fire apparatus are necessary to ensure access of emergency response personnel. These roadways, gates, approach angles, steep slopes and grades can also make it difficult for fire apparatus and other emergency vehicles to access a site. It is therefore essential that these roadway accesses be provided with proper all weather, paved surfaces, angle of approach, grades, and gate access.

Finding 9

Due to the rural nature and mountainous topography in San Diego County Fire Protection District, conditions exist such as poor water supply, poor access roads, steep grades, and steep canyon slopes. In addition, the distances emergency response personnel must travel can be very large and the response times can be long. Numerous studies of the growth of a fire in relation to time have proven that at ten minutes the fire is expected to have burned beyond control and any occupants

remaining in the burning building would not be expected to survive. A ten-minute response time more realistically represents the time beyond which serious injury or death is expected to occur. It is therefore found that San Diego County Fire Protection District response time at which mitigation would be required, is 10 minutes. Such mitigation would be in the form of fire sprinklers or increased fire flow. In addition, with fire sprinklers and smoke detectors together have reduced the number of fatalities in homes by 59%

Finding 10

Areas in the San Diego County Fire Protection District can have special fire prevention needs not fully covered by the provisions of the Fire Code itself. This is due to the unique topographic features demographics, infrastructure, and local economics of the Fire District.

Finding 11

The topography of San Diego County Fire Protection District 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 non-fire resistive natural vegetation. In addition to access and evacuation problems, the terrain makes delivery of water extremely difficult. Some hill areas are served by water tank and pump systems are subject to failure in fire, high winds, earthquake and other power failure situations. The aforementioned problems are set forth in the 2025 California Building Code and amendments.

Finding 12

The seasonal climatic conditions during the late summer and fall create numerous serious difficulties regarding the control of and protection against fires in the Insert your fire protection district. The hot, dry weather typical of this area in summer and fall, coupled with Santa Anna winds and low humidity frequently results in wildfires that threaten or could threaten San Diego County Fire Protection District.

Although some code requirements, such as fire-resistive roof classification, have a direct bearing on building survival in a wildland fire situation, others, such as residential fire sprinklers, may also have a positive effect. In dry climate on low humidity days, many materials are much more easily ignited. More fires are likely to occur and any fire, once started, can expand extremely rapidly. Residential fire sprinklers can arrest a fire starting within a structure before the fire is able to spread to adjacent brush and structures.

A seasonal wind also has the potential for interfering with emergency vehicle access, delaying or making impossible fire responses, because of toppling of extensive plantings of dense chaparral, eucalyptus and conifers trees. The trees are subject to uprooting in strong winds due to relatively small root bases compared to the tree itself. The aforementioned problems support the imposition of fire-protection requirements greater than those set forth in the Building Code or Fire Code.

Finding 13

Every five years the State Fire Marshals Office is required to release fire hazard severity threat maps to each County. Local jurisdictions are required to adopt and amend, if necessary, the hazard classifications. The County of San Diego SRA maps have three identified areas. Moderate, High

and Very High Hazard Severity Zones. These zones are layers of data that reflect the potential for that area to be threatened with wildfire over the next 25 years. With the passage of SB63 maps are now required on LRA Very High Fire Hazard Severity Zones. Therefore due to the probability and potential for wildfires to occur in conjunction with the above findings San Diego County Fire Protection District hereby identifies the necessity to be more restrictive on home hardening and defensible space requirements located in our geographical areas.

In Southern California the area has been identified by nationally recognized RISK mapping software such as FEMA National Risk Index (<https://hazards.fema.gov/nri/map>) and or Wildfirerisk.org (<https://wildfirerisk.org/explore/risk-to-homes/06/06073/>) San Diego having 100% chance of wildfire risk over the next 25 years. Due to these catastrophic risks in conjunction with the above findings, the San Diego County Fire Protection District amends the model codes in local ordinances to be more restrictive in building construction and defensible space.