

Express Findings: City of San Diego  
San Diego Municipal Code Ordinance # O-22043.  
**Division 1: Adoption of the 2025 California Fire Code**

*Administrative*

This amendment is necessary for administrative clarification and does not modify a California Building Standard pursuant to California Health & Safety Code 17958, 17958.5 and 17958.7. This amendment establishes administrative standards for the effective enforcement of building standards throughout the City of San Diego.

*I. Climatic Conditions:*

The City of San Diego is in Southern California and covers a vast and varied geographic area. The climate of San Diego, California is classified as a Mediterranean climate. The basic climate features hot, sunny, and dry summers, and cooler, wetter winters. However, San Diego is much more arid than typical Mediterranean climates, and winters are still dry compared with most other zones with this type of climate.

Temperatures soar to very high readings when easterly winds known as “Santa Ana Winds” bring hot, dry air from the inland deserts. This makes October the peak fire season for San Diego and the rest of Southern California due to low precipitation and sporadic heat waves that the average monthly temperatures do not immediately show. Examples of local winds experienced in the region are Santa Ana / Foehn winds, afternoon surface–heating generated winds, and prevailing desert winds.

Climate in the San Diego area often varies dramatically over short geographical distances, due to the city’s topography (the Bay, and the numerous hills, mountains, and canyons), thus exhibiting microclimate: frequently, particularly during the “May gray / June gloom” period, a thick “marine layer” cloud cover will keep the air cool and damp within a few miles of the coast but will yield to bright cloudless sunshine between 5 and 15 miles inland.

These climatic conditions cause extreme drying of vegetation and common building materials. Frequent periods of drought and low humidity add to the fire danger. This predisposes the area to large destructive fires (conflagrations) which necessitates rapid identification and extinguishment of all fires in the smallest stage possible. In addition to directly damaging or destroying buildings, these fires are also prone to disrupt utility services throughout the city. Obstacles generated by a strong wind, such as fallen trees, streetlights, and utility poles, will greatly impact the response time to reach an incident scene. During these winds,

the inability to use aerial type firefighting apparatus would further decrease our ability to stop fires in large buildings and place rescue personnel at increased risk of injury.

## *II. Topographical Conditions:*

San Diego has a varied topography. On its western side is more than 70 miles of coastline. Most of San Diego between the coast and Laguna Mountains consist of hills, mesas, and small canyons. Snow-capped (in winter) mountains rise to the east, with the Sonoran Desert farther to the east.

- a. Natural: The topographical conditions in the City of San Diego vary from sea level to Cowles Mountain (1,591') surrounded by 4000' elevations in surrounding San Diego County. Several sensitive habitats for various animal species and vegetation consist within open space areas and coastal locations between major urban centers that impact building and structure location, which impedes emergency access and response. This variety in regions contributes to an increased emergency response time, which necessitates cooperation between local agencies.
- b. Traffic and congestion are artificially created due to obstructive topographical conditions, which is common throughout the City of San Diego.
- c. These topographical conditions combine to create a situation, which places fire department response time to fire occurrences at risk and makes it necessary to provide on-site fire extinguishing systems and other protection measures to protect occupants and property.
- d. Many buildings are located on sloped terrain or canyon edges creating ingress/egress challenges for occupants and firefighters as well as communication challenges due to stories located partially or completely below grade.

## *III. Geological Conditions:*

The majority of City of San Diego residents live less than 15 miles from a fault that can cause a damaging earthquake, such as the Rose Canyon fault along the coast and beneath downtown San Diego, and the Elsinore and San Jacinto faults that cut through East County. In the event of an earthquake, the location of the epicenter as well as the time of day and season of the year would have a profound effect on the number of deaths and casualties, as well as property damage.

The major form of direct damage from most earthquakes is damage to construction. Bridges are particularly vulnerable to collapse, and dam failure may generate major downstream flooding. Buildings vary in susceptibility, dependent upon construction and the types of soils on which they are built. Earthquakes destroy power and telephone lines; gas, sewer, or water mains; which, in turn, may set off fires and/or hinder firefighting or rescue efforts. The hazards of earthquakes vary from place to place, dependent upon the regional and local geology. Ground shaking may occur in areas 65 miles or more from the epicenter (the point on the ground surface above the focus). Ground shaking can change the mechanical properties of some fine grained, saturated soils, where upon they liquefy and act as a fluid (liquefaction).

- A. Previous earthquakes in southern California have been accompanied by disruption of traffic flow and fires. A severe seismic event has the potential to negatively impact any rescue or fire suppression activities because it is likely to create obstacles like those indicated under the high wind section above. With the probability of strong aftershocks, there exists a need to provide increased protection for anyone on upper floors of buildings.
- B. Road circulation features located throughout the City of San Diego also make amendments reasonably necessary. Located through the City are major roadways, highways and flood control channels that create barriers and slow response times. Hills, slopes, street, and storm drain design accompanied with occasional heavy rainfall, cause roadway flooding and landslides and at times may make an emergency access route impassable. There are areas in the City of San Diego that naturally have extended emergency response time exceeding 5 minutes.

California Health and Safety Code Sections 17958.7 and 18941.5 require that the modification or change be expressly marked and identified as to which each finding refers. Therefore, the City of San Diego finds that the following tables set forth the 2025 California Fire Code and 2025 California Wildland-Urban Interface Code sections that have been modified and the associated local climatic, geological and/or topographical conditions described above supporting the modification. Additionally, pursuant to HSC 17958.7(c), where local amendments propose a modification or change to any building standard affecting a residential unit the condition(s) being met have been identified.

<b>CODE SECTION</b>	<b>Local Conditions</b>	<b>Explanation</b>	<b>AB 130</b>
101.1 – Title	Administrative	This administrative provision clarifies that Chapter 5, Article 11, Division 1-83 of the San Diego Municipal Code is specific to the local adoption of the California Fire Code including necessary amendments, is titled “The San Diego Fire Code” and when the term code is used, it refers to the San Diego Fire Code.	N/A
103.1 – Creation of Agency	Administrative	Clarifies that the Office of the Fire Marshal is responsible for the implementation, administration and enforcement of the provisions of this code	N/A
104.7 – Official Records	Administrative	This section, which references Sections 104.7.1 – 104.7.6, listed specific types of records and associated retention periods which may conflict with federal, state or local laws. This amendment revised that language to indicate that all records will be maintained in accordance with the city’s master records schedule which is periodically updated to ensure consistency with applicable laws.	N/A
104.12 – Cost Recovery	Administrative	Added to clarify that the fire department has the authority to obtain reimbursement for the expense of emergency response and/or enforcement actions to protect the public from fire or hazardous substances as permitted by existing local, state, and federal laws.	N/A
105.5 – Required Operational Permits	Administrative	This section draws language from section 105.1.1 to clarify that the fire code official is not only authorized to issue operational permits but that these permits are required and places the responsibility on the property owner to ensure that the necessary permits are obtained prior to conducting any activities requiring a permit. It also updates the section numbers to reflect the additional permits that have been added.	1,6 (E)
105.5.60 – Fire and Harmful Gas Emergency Alarms	Administrative	Division 83 of the SDMC establishes a Fire and Harmful Gas Emergency Alarm program which requires a permit to be filed with SDFD. This addition provides consistency with the other required operational permits listed in the Fire Code.	1
105.5.61 – General Use Permit –	Administrative	This provision provides an opportunity for the fire code official to issue an operational permit for hazardous conditions or operations	N/A

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Commercial Buildings		that are not specifically listed in the code. It also requires a permit for buildings of a size that warrants a routine inspection due to the potential for life or property loss.	
105.5.62 – State-Mandated Occupancy	Administrative	The issuance of an operational permit provides additional regulatory oversight to ensure the routine inspection of occupancies required by the California Health & Safety Code to be inspected annually.	6 (E)
105.5.63 – Temporary Fire Access Roads	Administrative	The issuance of an operational permit provides a mechanism for approval of temporary fire access roads used at construction or demolition sites as required by CFC Chapter 33 to establish and maintain adequate fire department access to the site.	6 (E)
105.5.64 – Temporary Water Supply	Administrative	The issuance of an operational permit provides a mechanism for approval of water supplies used at construction or demolition sites as required by CFC Chapter 33 to support manual firefighting operations at the site.	6 (E)
108.2 – Fee Schedule	Administrative	Expands on the model code language which requires fees for permits and also includes fees to recover the costs related to the issuance of permits and associated inspections, or other inspections or activities as deemed necessary by the Fire Code Official. This section also clarifies that the fees will be charged in accordance with the fee schedule established by resolution of the City Council.	6 (B)
112.1 - Board of Building Appeals and Advisors	Administrative	The Board of Building Appeals and Advisors has already been established pursuant to Section 111.0207 of the Municipal Code and reviews requested code deviations, as well as interpretations from/for the San Diego Fire Code; the Building, Electrical, Plumbing, Mechanical, Residential Building, Green Building, and Existing Building Regulations. The Board evaluates alternatives proposed and advises the Building Official and Fire Chief as to suitability and equivalence to required building standards in the regulations.	1
113.2.1 – Operational Permit Registration	Administrative	Requires the owner of a building that requires an operational permit to register with the fire department’s citizen portal to provide current contact information. This information is required to effectively and	6 (D)(E)

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		promptly issue notices for code violations and to provide other essential communications necessary for the abatement of hazardous conditions.	
113.3.1 – Service	Administrative	Establishes methods of service of a notice of violation and references SDMC 11.0301 to ensure consistency with any changes in city regulations or procedures.	N/A
113.4 – Violation Penalties	Administrative	Amends model code language regarding violation penalties and creates separate sections for clarification to distinguish between civil penalties, criminal penalties and abatement and cost recovery in accordance with local, state and federal laws.	6 (E)
202 Definitions	Administrative	Definitions are added to provide clarification for terms that are not defined in the model code.	N/A
304.1.3 Vegetation	Administrative	California Fire Code chapter 49 has been repealed with the adoption of Part 7 of title 24. Vegetation clearance requirements are now contained within the California Wildland-Urban Interface Code.	1,3
304.1.3.1 Clearance of Brush and Vegetative Growth from Roadways.	Climatic & Topographical	Additional clearance of brush or other combustible vegetation adjacent to the roadway provides a safer egress route for residents in the event of wildfire. Additionally, it creates safer and more tenable routes for responding firefighters to access communities and perform suppression operations.	1, 3
304.1.3.2 Waste Material	Climatic & Topographical	Waste material can contribute to the ignition or spread of fire to structures and vegetation. Wildland Urban interface areas are already vulnerable to large fires that can spread rapidly and destroy many homes or other structures.	1, 3
307.4.1 Bonfires	Administrative	This code section was adopted in previous ordinance and was updated to maintain consistency with current SDMC requirements for beach areas in section 63.20.5.	1
307.4.3 Portable Outdoor Fireplaces	Climatic & Topographical	Portable outdoor fireplaces are required to be separated from structures or combustible materials by 15 feet to prevent accidental ignition from sparks or embers emanating from the fireplace. The CFC provides an exception to this requirement for one- and two-	1, 3

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		family dwellings. However, due to the additional risk of homes located in a wildland urban interface area the exceptions were modified to require the 15-foot separation in one- and two-family dwellings located within such areas. The use of a spark arrestor is consistent with current policy and provides additional safeguards to reduce the risk of sparks or embers igniting a nearby fuel source.	
307.4.4 Red-flag and other high fire risk conditions	Climatic & Topographical	Open burning is prohibited when atmospheric conditions make it unsafe, however, recreational fires and portable outdoor fireplaces are not considered open burning. This amendment clarifies that these activities are also prohibited during dangerous fire weather events. It is important to note that propane or other gas-fueled fireplaces are not considered a portable outdoor fireplace, which is defined in the CFC as a solid fuel burning appliance and would still be permitted. Gas fueled fireplaces do not emit sparks and embers and do not create the same hazard. Bonfires at the beach were specifically excluded due to the low risk of fire spread.	1, 3
322.6 – Sales Prohibited	Administrative	CFC section 322.3 requires that micromobility devices be listed and labeled according to the applicable UL listing. This expands on the listing requirement and places responsibility on business owners by prohibiting the sale, rental, leasing, storage, repair, modification, or assembly of lithium-ion and lithium metal batteries not listed by a nationally recognized testing laboratory in the City of San Diego.	N/A
322.6.1 – Documentation	Administrative	Provides additional requirements for acceptable documentation to be displayed or available for review to verify compliance with the listing requirements.	N/A
322.6.2 - Modifications Prohibited	Administrative	Many lithium-ion battery fires are the result of an attempt to modify battery packs or recondition batteries that were damaged or no longer hold an adequate charge. This addition prohibits the reconditioning, modification or assembly of non-listed or previously used lithium-ion battery cells into new battery packs or devices.	N/A

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401.2 Approval	Administrative	Clarifies that emergency plans do not need to be submitted to the Fire Code Official for approval but must be maintained on site and available for review. This removes the burden of having to review and approve all plans while still maintaining the authority to do so. It also requires a qualified person to develop the plans and allows the fire code official to require a 3rd party to develop plans where there is not a qualified person, the business chooses to do so or the Fire Code Official requires it.	N/A
401.4 Required Plan Implementation	Administrative	Clarifies that a fire department official's direction during an emergency situation takes precedence over any pre-determined emergency plans.	N/A
403.2 Group A Occupancies	Administrative	The requirement of an emergency plan for all Group A occupancies is too inclusive and is unnecessary for many occupancies that are included in this classification. Emergency plans are valuable for larger assemblies due to the occupant's unfamiliarity with the building and potential for large loss of life which is why an occupant load exceeding 500 was included. This occupant also correlates with CFC section 403.11.3.1 which requires crowd managers for gatherings of more than 500 people.	N/A
403.11.1 – Fire Watch Personnel	Administrative	Section 403.11 gives the fire code official the authority to require fire watch personnel for large public gatherings or other activities where it is deemed necessary for public safety. This amendment clarifies that the application of this requirement applies beyond large public gatherings, contests or activities and may also be required for any occupancy where there is an increased hazard due to current conditions inside the building. This also clarifies that these personnel are subject to the fire code official's orders when working in this capacity.	N/A
403.11.1.1 – Duty Times	Administrative	Clarifies that the duty times for fire watch personnel are subject to the requirements of the fire code official.	N/A

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403.11.1.2 – Duties	Administrative	This amendment includes an additional duty for fire watch personnel to inspect the required fire appliances and ensure they are in good working order. This may include fire extinguishers or other fire protection systems to ensure that they are available for use in the event of an emergency.	N/A
403.11.1.3 Qualifications	Administrative	The model code requires qualified fire watch personnel but does not provide any minimum requirements to be considered qualified. This section seeks to clarify the term qualified by introducing minimum qualifications for fire watch personnel based on some NFPA standards and other recognized practices.	N/A
403.11.1.4 – Fire Safety Officer	Administrative	The CFC contains provisions for fire watch personnel to be provided at large public assemblies or events when deemed necessary. This section was added to include and distinguish fire safety officers which are defined as members of the San Diego Fire-Rescue Department. It is the normal practice of the San Diego Fire-Rescue Department to utilize professional, trained personnel to provide consistency and a minimum level of training for events in which the Fire Code Official deems their presence necessary. This section also addresses the associated cost of such services and indicates the responsibility of the permittee to pay the associated fee as adopted in the current fee schedule.	N/A
503.3.1 - Street Parking Prohibited	Administrative, Climatic & Topographical	Many of the older streets in the city are very narrow and in the event of a major wildfire evacuation may become a challenge, especially with vehicles parked on the street. Narrow road conditions also affect fire apparatus responding to or mitigating emergencies and can make conditions more hazardous for them. Restricting street parking during severe fire weather will help to alleviate these issues. This language is similar to recommendations made by the Board of Forestry for at-risk subdivisions in response to Assembly Bill 2911 which effected Public Resources Code 4290.5.	1

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505.1 - Address Identification	Climatic	A visible address is crucial for responding agencies to quickly locate a building in the event of an emergency. One of the key components of this requirement is that the numbers must be visible from the street. The CFC provides a minimum height of 4 inches for address numbers. Commercial properties will typically require larger numbers than a residential property due to larger setbacks from the street. This amendment recognizes that fact and provides additional guidance for commercial properties on number size, however, address numbers greater than 6 inches may be required in order to be clearly visible from the street or roadway fronting the property. This increased size is critical for rapid identification of an address during a wildfire or other emergency event.	1
507.3 – Fire Flow	Administrative	The CFC states that the required fire flow for buildings shall be determined by an approved method or Appendix B. This amendment clarifies that Appendix B is the approved method to determine fire flow. It also clarifies that if the fire flow required by Appendix B cannot be met, that an alternative design or alternate means of protection must be proposed in accordance with CFC 1.11.2.4.	N/A
507.5.7 Identification	Administrative & Climatic	Fire hydrants or other fire protection equipment such as FDCs may inadvertently become obstructed due to parking or other obstructions. Marking the required clear space by striping or providing signs can help to keep the minimum clear space available to access the equipment or appliances. Placing blue markers in the roadway helps firefighters to identify the location of hydrants more quickly, especially in low lighting or low visibility conditions or when hydrants are not visible from the roadway.	1
901.6.3 – Records	Administrative	The language in the model code references CFC 110.3 for records retention for inspection testing and maintenance of fire protection systems, however, this conflicts with the requirements in Title 19. This section was amended to reference sections 901.6.3.1 to 901.6.3.3 that were added to maintain consistency with Title 19	N/A

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		requirements and current SDFD practice with electronic submission of records.	
901.6.3.2 – Retention Period	Administrative	Maintains consistency with retention period of 5 years required by Title 19	N/A
901.6.3.3 – Records Submission	Administrative	Maintains consistency with Title 19 requirement for the contractor, company, or licensee to provide a written report of the results to the building owner at the completion of the testing and maintenance. This amendment also seeks to clarify CFC 110.3 which specifies that the fire code official is authorized to prescribe the form and format of periodic testing. SDFD currently requires contractors to submit such records electronically to the SDFD compliance portal.	6(E)
901.7.7 – Immediate Fire Watch Required	Administrative	Qualified fire watch personnel are not always available to be on site immediately. This provision outlines the fire code official's authority to establish an immediate fire watch using SDFD personnel until qualified fire watch personnel arrive on site where there is potential for significant loss of life or property. This also includes a reference to 403.11.1.3 which establishes the qualifications for fire watch personnel.	N/A
1101.1-1101.4.3 General	Administrative	These administrative requirements are not adopted by the state as existing buildings are required to adhere to the provisions of the California Existing Building Code. These sections are being adopted to provide clarification for administrative provisions of those sections of chapter 11 that have been adopted including the establishment of a time schedule for completion of work.	1
1104.3-1104.5.1 Means of Egress for Existing Buildings	Climatic & Topographical	Adopts provisions for exit sign illumination and emergency power requirements for means of egress for certain occupancies. It is essential for occupancies with high life hazard to maintain egress lighting in the event of a power outage which are more likely to occur due to damaged utilities from destructive wildfires or scheduled power shutdowns from the utility company during elevated fire weather events.	1

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1113.1.1 – Application	Administrative	This section was amended to clarify the application of the fire alarm requirements for existing R-1 and R-2 occupancies established by the state. Apartment houses are not currently defined in the code but were defined in the 1988 UFC which specifically included condominiums in the definition. Apartments and condominiums are not differentiated for the purposes of the code and are both treated as R-2 occupancies. The requirement for a fire alarm to be installed in a building should not be based on building ownership as the risk applies equally to a condominium that is owned as it does to an apartment that is “let” or leased. This also recognizes that many privately owned condos are leased as short-term rentals or vacation rentals which would necessitate compliance with these provisions.	6(E)
1113.12.3 – Compliance Schedule	Administrative	This addition provides guidelines to establish a compliance schedule in accordance with CFC section 1101.4.2 once the need for a retroactive fire alarm has been identified.	6(E)
1207.1 – General	Administrative, Topographical & Geological	CFC section 1207.11 provides requirements for ESS in Group R-3 and R-4 occupancies including vehicle impact protection, equipment listings, spacing requirements and approved locations for installations among others. These same systems, if under the threshold quantities in Table 1207.1.3, could be installed in an R-1 or R-2 occupancy without a permit and without being held to the requirements of section 1207.11 to minimize risk to life and property. This amendment does not propose any new requirements for ESS or for group R occupancies, but rather ensures that the existing minimum requirements of section 1207.11 are met in all Group R occupancies when an ESS is installed. The absence of minimum safety requirements and oversight for ESS installations in R-1 and R-2 occupancies poses a serious life safety risk as a fire in one of these occupancies has the potential to cause a significant loss of life and property. Risk of damage to these systems is greater due to likelihood of earthquakes and wildfire which increases the need to	N/A

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		regulate these installations to ensure they conform to the minimum standards prescribed by 1207.11. This amendment reduces potential fire risk due to vehicular damage or improper installation that could lead to catastrophic results with potential for delayed response times due to topographical conditions.	
1207.2.1 – Commissioning	Administrative	An Emergency Response Plan provides critical information to first responders needed for safe and effective mitigation of ESS emergencies. This amendment requires an emergency response plan to be included as an item on the commissioning plan for ESS in accordance with the requirements of NFPA 855 Appendix G.	N/A
1207.3.4 – Energy Storage Management System	Climatic, Topographical & Geological	The most common form of energy storage management system (ESMS) is a battery management system that plays a critical role in verifying that the system parameters identified are maintained within safe values for the ESS technology involved. In addition to shutting down the system, the ESMS can also transmit system status conditions to on-site and off-site personnel to notify them of the off-normal condition. This amendment includes a requirement for an ESMS to transmit a trouble signal to an annunciator panel at an approved location to provide critical information to first responders if there are potentially hazardous conditions affecting the ESS. Necessary due to the increased risks from wildfire, earthquake damage, and unpredictable power fluctuations that are consequences of the climatic, topographical, and geological conditions in the City.	N/A
1207.3.4.1 – Annunciator Panel	Administrative, Climatic, Topographical & Geological	This section clarifies that where an annunciator panel is required by 1207.3.4 it must visibly indicate hazardous conditions including hazardous temperatures, short circuits, over voltage or under voltage when detected. The location of the annunciator panel shall be approved by the Fire Code Official. Necessary due to the increased risks from wildfire, earthquake damage, and unpredictable power	N/A

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		fluctuations that are consequences of the climatic, topographical, and geological conditions in the City.	
1207.7 – 1207.7.2 – Indoor Installations	Climatic, Topographical & Geological	This section is amended to remove references to dedicated use and non-dedicated ESS buildings and the associated table 1207.7. Dedicated use buildings pose a significant hazard due to the increased risks from wildfire, earthquake damage, and unpredictable power fluctuations and may also affect fire access, response times and water availability.	N/A
1207.7.3 – Prohibited ESS Installation Locations	Climatic, Topographical & Geological	This section was amended to include additional prohibited locations for ESS including dwelling units due to the life safety risk and electrical rooms and rooms and areas housing fire protection or life safety systems to maintain fire department access in the event of an emergency. Necessary due to the increased risks from wildfire, earthquake damage, and unpredictable power fluctuations and may also affect fire access, response times and water availability.	N/A
1207.7.4 – Fire Resistance Rated Separations	Administrative	This section was amended for consistency and coordination with the removal of dedicated use buildings in 1207.7.1	N/A
1207.11 – ESS in Group R Occupancies	Administrative, Topographical & Geological	This amendment requires ESS below threshold quantities in Table 1207.1.3 installed R-1 and R-2 occupancies to comply with the provisions of 1207.11. See explanation for 1207.1.	N/A
3307.2.1 Combustible Building Materials	Administrative, Climatic & Topographical	This section was amended for consistency with the minimum fire flow permitted in Table B105.1 (1) (as amended locally). The amendment ensures a minimum fire flow of 1,000 gpm when combustible materials arrive on site, which can typically be provided from a single hydrant. 500 gpm is not a sufficient fire flow to extinguish a large fire or protect exposures to buildings. There is also increased risk of a wildfire igniting multiple piles of building materials or those ignited building materials extending to flammable vegetation. This amendment does not increase the fire flow required for the finished building, but rather ensures a minimum fire flow to	1

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		be available for firefighting operations once combustible materials arrive on site.	
3307.2.2 – Vertical Construction of Types III, IV or V Construction	Administrative, Climatic	Removes sections 3307.2.2.1 – 3307.2.2.3 which consider a building’s distance to the property line when determining the required fire flow during construction and instead requires the full fire flow required for the completed building to be available prior to vertical combustible construction commencing. Buildings under construction are much more vulnerable to fire as they do not have many of the fire rated components installed and required fire protection systems such as automatic sprinklers may not be installed or functional for some time. This is the most critical time to have the full fire flow required for the building as the only fire protection will be through manual suppression efforts by the fire department. 500 gpm as currently permitted by the CFC for buildings more than 60 feet from a property line would be severely inadequate to extinguish or control any significant fire which due to the lack of compartmentalization and fire resistive coverings produce significant radiant heat and embers. This also conflicts with the minimum fire flow established by Table B105.1 (1) or B105.2 as applicable. Climatic conditions including high winds and dry brush make uncontrolled fires a significant concern and may lead to large conflagrations or wildfires.	1
3307.4 – Standpipe Supply		This section was amended for consistency with the minimum fire flow permitted in Table B105.1 (1) (as amended locally) and increases the minimum fire flow from 500 to 1,000 gpm when a standpipe is required, which can typically be provided from a single hydrant. 500 gpm is not a sufficient fire flow to extinguish a large fire or protect exposures to buildings. There is also increased risk of a fire in a multiple story building extending to flammable vegetation. This amendment does not increase the fire flow requirement but rather ensures that the water is available before a standpipe is required when construction exceeds 40 feet in height.	1

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5001.1.2 Hazardous Materials HAZMAT Program Legislative Declaration and Findings	Administrative	This section establishes the HAZMAT program (previously referred to as CEDMAT) and describes the need for the program due to the increased hazard to the community presented by the commercial and industrial sector using and storing hazardous materials and/or conducting hazardous processes.	N/A
5001.1.3 Purpose of HAZMAT Program	Administrative	This section describes the purpose, scope and intent of the program in order to best mitigate the risk to the community and emergency responders. This includes requiring approved documentation to verify the type, quantity and location of hazardous materials to verify that businesses are not exceeding the maximum allowable quantities for hazardous materials in a control area. Businesses must also be issued the appropriate operational permits for the materials and processes they are storing and using once it has been verified that the storage and use comply with the requirements of the California Fire Code or any other applicable codes and standards. The HAZMAT inspection program works in concert with San Diego County Hazmat who is the CUPA for San Diego County.	N/A
5001.1.4 HAZMAT Inspections	Administrative	Clarifies the hazardous materials information required to be provided to the fire inspector in accordance with CFC 5001.5.2 Hazardous Materials Inventory Statement. A timeline of 15 days is also added to this requirement to prevent any excessive delays in obtaining this necessary information.	N/A
5601.1.3.1 Where prohibited	Administrative	Fireworks of any kind, whether dangerous fireworks or safe and sane fireworks as defined in the Health & Safety Code, are prohibited within the City of San Diego and are responsible for thousands of fires and injuries every year. Fireworks started an estimated 19,500 fires in 2018, including 1,900 structure fires, 500 vehicle fires, and 17,100 outside and other fires. These fires caused five deaths, 46 civilian injuries, and \$105 million in direct property damage.	N/A

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Table B105.1(1) Required Fire Flow for One-and Two-Family Dwellings, Group R-3 and R-4 Buildings and Townhouses.	Climatic & Topographical	Table B105.1(1) determines the fire flow requirement for one-and two-family dwellings, group R-3 and R-4 buildings and townhouses. These buildings are typically protected with an NFPA 13D sprinkler system which is designed to prevent flashover and give occupants additional time to escape; they are not designed to protect the structure. The modifications made to the table ensure an adequate water supply for manual firefighting operations. Reductions are still allowed for sprinklered buildings given the fact the sprinklers will help to control the fire until firefighters arrive, requiring less water for extinguishment. It is also important to ensure an adequate water supply in the event of a wildfire where one- and two-family homes are exposed to fire from the exterior and multiple homes may be affected by fire at the same time. Climatic and topographical conditions create increased potential for significant wildfires and large conflagrations requiring more water available for fire flow.	1
Table B105.2 Required Fire Flow for Buildings other than One-and Two-Family Dwellings, Group R-3 and R-4 Buildings and Townhouses.	Climatic & Topographical	Table B105.2 determines the fire flow requirements for buildings other than one-and two-family dwellings, group R-3 and R-4 buildings and townhouses. The table gives a 75% reduction in required fire flow for buildings with an NFPA 13 or 13R system. This reduction allows for fire flows and hydrant spacing that is inadequate for manual firefighting operations. Although sprinklers are very effective, the possibility that the sprinklers may be inoperable due to tampering, scheduled maintenance, lack of maintenance or improper design needs to be considered. Providing an adequate water supply is essential for successful fireground operations to ensure the protection of life and property. San Diego is also prone to large and devastating wildfires that present unique challenges. Table B105.1(2) determines the required fire flow for a building based on the type of construction and the fire-flow calculation area. The table does not consider the contents of the building and the resulting fire load that those contents create. Changing the reduction to 50% will provide a	1

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		more adequate water supply to the premises and allow for more flexibility and versatility with the property use in the future without having to upgrade the water supply, which would be much more costly at that point. This will also help alleviate the need for the Fire Code Official to increase the fire flow requirements in accordance with B103.2 and provide more consistency for contractors. Climatic and topographical conditions create increased potential for significant wildfires and large conflagrations requiring more water available for fire flow.	
Table C102.1 Required Number and Spacing of Fire Hydrants	Climatic, Topographical, Geological	Appendix C gives hydrant spacing increases of 50% and 25% for buildings protected by an NFPA 13 and 13R system respectively. Hydrant spacing increases are already provided based on the reduction in fire flow requirements in appendix B for sprinklered buildings. The resulting hydrant spacing when sprinkler benefits are combined from both tables allows for unacceptable distances which could result in delays with securing a water supply for firefighting operations.	1
D103.5 Fire apparatus access road gates	Administrative, Climatic & Topographical	This section provides minimum requirements for gates installed across fire apparatus access roads to ensure that fire access is not obstructed and response times are not delayed. This section was amended in the 2022 code cycle to maintain the established minimum gate width of 13'. This section is being updated again in the 2025 code cycle to recognize the minimum 14' clear width required by CCR Title 14 1273.01 in WUI areas which is now also included in the 2025 CWUIC section 403.1.2. It also clarifies that the minimum width of 13' is only applicable for divided roadways where the gate serves a single lane, but where a single gate spans a 20' fire access road the gate must provide the full clear width of 20'.	1,3
D103.6 – Fire Lane Markings	Administrative	This amendment ensures consistency with the designation of a fire lane as required in California Vehicle Code section 22500.1 and allows for alternative methods of marking a fire lane including	N/A

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		painting of the road or curbs in addition to the requirement for signs as specified in the model code language.	
D103.6.1 – Roads 20 -28 feet in width	Administrative	This amendment modifies the model code language for road widths requiring fire lane markings to reflect a deduction of 8’ for a parked vehicle to ensure a clear width of 20’ is maintained for fire department vehicle access. Model code language only attributes a loss of 6’ of clear width which is not adequate considering the width of many modern vehicles. This amendment does not affect the minimum required road width as specified in CFC section 503.2.1 and the intent is only to ensure that the minimum established width is maintained.	N/A
D103.6.2 – Roads More than 28 feet in width	Administrative	This amendment modifies the model code language for road widths requiring fire lane markings to reflect a deduction of 8’ for a parked vehicle to ensure a clear width of 20’ is maintained for fire department vehicle access. Model code language only attributes a loss of 6’ of clear width which is not adequate considering the width of many modern vehicles. This amendment does not affect the minimum required road width as specified in CFC section 503.2.1 and the intent is only to ensure that the minimum established width is maintained.	N/A
D106.2 – Projects Located in a Wildland-Urban Interface Area	Climatic & Topographical	Public Resources Code 4290.5 requires local governments to identify existing subdivisions with more than 30 dwelling units located in a Very High Severity Fire Hazard Zone (VHFHSZ) without a secondary egress route. These subdivisions were determined to be at significant fire risk, and the Board of Forestry in cooperation with the State Fire Marshal was tasked with making recommendations to improve the safety of these subdivisions which included creating a secondary access to the subdivision when possible. This amendment to the code prevents new developments of more than 30 dwelling units located in a VHFHSZ from being designed without a secondary egress route. The model language currently allows for projects up to 200	1,3

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		dwelling units with a single fire access road if they are sprinklered. Residential sprinklers will not protect a community from a wildfire which is the primary focus of the need for a secondary access road. This amendment is necessary due to the extreme wildfire risk posed by our climate and topography.	
D107.1 One- or Two - Family Dwelling Residential Developments	Climatic & Topographical	Amended language to keep consistent with PRC 4290.5. See explanation for D106.2. Above.	1
Division 83 – Fire and Harmful Gas Emergency Alarms	Administrative	The City of San Diego instituted a False Alarm Program to help reduce the excessive number of false alarms occurring within the city. A false alarm is an alarm activation causing a response by the Fire-Rescue Department when an emergency situation does not exist. The majority of alarms that the San Diego Fire-Rescue Department responds to are false, resulting in a waste of resources by reducing emergency unit availability and creating unnecessary danger to citizens and firefighters. For excessive responses, a cost recovery fee and a penalty may be assessed to the permit holder.	1

Express Findings: City of San Diego  
San Diego Municipal Code Ordinance # O-22042.  
**Division 2: Adoption of the 2025 California Wildland-Urban Interface Code**

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101.1 – Title	Administrative	This administrative provision clarifies that Chapter 5, Article 12, Division 1-6 of the San Diego Municipal Code is specific to the local adoption of the California Wildland-Urban Interface Code including necessary amendments, is titled “The San Diego Wildland-Urban Interface Code” and when the term code is used, it refers to the San Diego Wildland-Urban Interface Code.	N/A
104.7 – Official Records	Administrative	This section, which references sections 104.7.1 – 104.7.5 listed specific types of records and associated retention periods which may conflict with federal, state or local laws. This amendment revised that language to indicate that all records will be maintained in accordance with the city’s master records schedule which is periodically updated to ensure consistency with applicable laws.	N/A
108.2 – Fee Schedule	Administrative	Expands on the model code language which requires fees for permits and also includes fees to recover the costs related to the issuance of permits and associated inspections, or other inspections or activities as deemed necessary by the Fire Code Official. This section also clarifies that the fees will be charged in accordance with the fee schedule established by resolution of the City Council.	6(B)(E)
109.3.7 – Violation Penalties	Administrative	Amends model code language regarding violation penalties and creates separate sections for clarification to distinguish between civil penalties, criminal penalties and abatement and cost recovery in accordance with local, state and federal laws.	6(E)
112.1 - Board of Building Appeals and Advisors	Administrative	The Board of Building Appeals and Advisors has already been established pursuant to Section 111.0207 of the Municipal Code and reviews requested code deviations, as well as interpretations	1

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		from/for the San Diego Fire Code; the Building, Electrical, Plumbing, Mechanical, Residential Building, Green Building, and Existing Building Regulations. The Board evaluates alternatives proposed and advises the Building Official and Fire Chief as to suitability and equivalence to required building standards in the regulations.	
202 Definitions	Administrative	Definitions are added to provide clarification for terms that are not defined in the model code.	N/A
302.1.1 - Adoption of Fire Hazard Severity Zones	Administrative	This section is included to clarify the adoption of the Fire Hazard Severity Zone maps as recommended by the State Fire Marshal and as adopted by the City of San Diego pursuant to GOV 51179. This map is essential in determining the extent of the Wildland-Urban Interface Area where the provisions of this code apply. This was previously located in CFC Chapter 49 and was moved to this section after Ch 49 was repealed and Part 7 was adopted by the CBSC.	1
403.2.2 – Road Signs	Administrative	Adds a requirement for road signs to include signs prohibiting parking during “red flag” warnings or fire weather watch conditions to maintain adequate road width for evacuations. This is consistent with an existing local addition to the CFC included in section 503.3.1. See explanation for CFC 503.3.1 for additional background.	1,3
504.2.3-Drip Edge Flashing	Climatic & Topographic	Carries over non-combustibility requirements for drip edge flashing that were previously adopted in SDMC sections 145.0705(b) and 149.0337(d)(2) as local additions to Chapter 7A of the California Building Code and section 337R of the California Residential Code. This local addition supports home hardening in WUI areas based on the increased wildfire risk due to climatic and topographical features.	1,3
504.8.3 – Vinyl Window Reinforcing	Climatic & Topographic	Carries over reinforcement requirements for vinyl windows and updates the referenced standard that was previously adopted in SDMC sections 145.0708 and 149.0337(e) as local additions to Chapter 7A of the California Building Code and section 337R of the California Residential Code. This local addition supports home	1,3

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		hardening in WUI areas based on the increased wildfire risk due to climatic and topographical features.	
601.3 – Definitions	Administrative, Climatic & Topographical	Includes definitions specific to the defensible space and fire protection requirements in Chapter 6. These definitions are needed to clarify defensible space requirements and maintain consistency with current practice and state law.	1, 3
603.2 – Landscape Plans	Administrative, Climatic & Topographical	This section was amended to simplify the application to any Wildland-Urban Interface Areas which is a defined term and applies to any Fire Hazard Severity Zones in the SRA or LRA and any additional areas designated by the local jurisdiction. This also includes references to the Landscape Regulations in the SDMC.	3
603.3 – Landscape Plans	Administrative, Climatic & Topographical	Provides additional clarification to determine when landscape plans are required to be submitted consistent with current SDMC brush management requirements, while still allowing for fire code official discretion.	3
603.3.1 – Contents	Administrative, Climatic & Topographical	Includes requirement for delineation of the 5-foot ember resistant zone including any hardscapes as well as slope grade breaks on landscape plans to help determine compliance with zone 0 and required plant spacing in other fuel modification zones.	3
603.4.1 - Shrubs	Climatic & Topographical	Reduces maximum height of shrubs in zone 1 from 6' to 4' consistent with requirements established in SDMC brush management regulations.	3
603.4.2 – Trees	Climatic & Topographical	Expands on the requirements for trees to be 10 feet from a chimney and includes a minimum separation distance of 10' from structures consistent with current SDMC brush management requirements.	3
603.5 – Fuel Modification Zone Requirements	Climatic & Topographical	This section clarifies when fuel modification zones need to be identified and established on landscape plans and established minimum requirements therein. Necessary due to the climatic and topographic conditions in the region creating severe wildfire risk due to the hot, dry climate and steep terrain resulting in extreme wildfire conditions.	3

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Table 603.5 – Fuel Modification Zone Width Requirement	Climatic & Topographical	Clarifies the required width of each fuel modification zone and introduces the new zone 0 and zone 3 (where required by the fire code official) in addition to the zone 1 and 2 requirements consistent with state law. Necessary due to the climatic and topographic conditions in the region creating severe wildfire risk due to the hot, dry climate and steep terrain resulting in extreme wildfire conditions.	3
603.5.1 - Fuel Modification of Combustible Vegetation from Sides of Roadways,	Climatic & Topographical	Allows the Fire Code Official to require a property owner to modify combustible vegetation in the area within 20 feet from each side of a public or private road adjacent to the property to establish a Fuel Modification Zone to facilitate evacuation or access needs. Necessary due to the climatic and topographic conditions in the region creating severe wildfire risk due to the hot, dry climate and steep terrain resulting in extreme wildfire conditions.	3
604.1 – General	Administrative, Climatic & Topographical	Replaced the term building with the term structure as defined in Chapter 6 for clarification and consistency.	3
604.2 – Application	Administrative, Climatic & Topographical	Replaced the term buildings and structures with the term structure as defined in Chapter 6 for clarification and consistency. Simplified the locations where the defensible space requirements apply.	3
604.3 – Requirements	Administrative, Climatic & Topographical	Replaced the term building with the term structure as defined in Chapter 6 for clarification and consistency.	3
604.3.1 – Defensible Space Fuel Modification Zones	Climatic & Topographical	Clarifies where defensible space fuel modification zones need to be established consistent with Government code 51182.	3
604.3.2 – Zone 0 Requirements	Climatic & Topographical	Establishes requirements for zone 0 consistent with the draft regulations established by the Board of Forestry as a result of AB 3074. Specific requirements are included in this code for the readers convenience. Necessary due to the climatic and topographic	3

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		conditions in the region creating severe wildfire risk due to the hot, dry climate and steep terrain resulting in extreme wildfire conditions.	
604.3.3 - Zone 1 Requirements	Climatic & Topographical	Establishes requirements for zone 1 consistent with current requirements in Title 14, GOV 51182 and SDMC brush management regulations. Specific requirements are included in this code for the readers convenience. Necessary due to the climatic and topographic conditions in the region creating severe wildfire risk due to the hot, dry climate and steep terrain resulting in extreme wildfire conditions.	3
604.3.4 - Zone 2 Requirements	Climatic & Topographical	Establishes requirements for zone 2 consistent with current requirements in Title 14, GOV 51182 and SDMC brush management regulations. Specific requirements are included in this code for the readers convenience. Necessary due to the climatic and topographic conditions in the region creating severe wildfire risk due to the hot, dry climate and steep terrain resulting in extreme wildfire conditions.	3
604.3.5 - Zone 3 Requirements	Climatic & Topographical	Establishes requirements for zone 3 where defensible space beyond 100 feet is required by the fire code official or by a fire safety expert as part of a fire protection plan. Necessary due to the climatic and topographic conditions in the region creating severe wildfire risk due to the hot, dry climate and steep terrain resulting in extreme wildfire conditions.	3
604.3.6, Table 604.3.6 (1) and Table 604.3.6 (2) – Spacing and Separation Requirements	Climatic & Topographical	This section and the associated tables provide clarifications on vertical and horizontal spacing requirements for trees and shrubs consistent with the requirements of Title 14 section §1299.03 (b) 1. which references the State Board of Forestry and Fire Protection's, "General Guidelines for Creating Defensible Space. Necessary due to the climatic and topographic conditions in the region creating severe wildfire risk due to the hot, dry climate and steep terrain resulting in extreme wildfire conditions.	3
604.3.7 – Public Nuisance	Administrative,	Clarifies that a violation of these requirements may be deemed a public nuisance consistent with California Government Code section 51177 and references existing abatement procedures established in	6(E)

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		with SDMC Chapter 1, Article 2, Divisions 6 & 7 and Chapter 5, Article 4, Division 2.	
604.3.8 – Vacant lots	Climatic & Topographical	Establishes requirements for vacant lots to reduce the risk of weeds or other combustible vegetation or materials igniting and placing surrounding buildings or vegetation at risk of fire. Necessary due to the climatic and topographic conditions in the region creating severe wildfire risk due to the hot, dry climate and steep terrain resulting in extreme wildfire conditions.	3
604.3.9 – Designated Evacuation Roadways	Climatic & Topographical	Establishes requirements to maintain vegetation along designated evacuation roadways to maintain safe evacuation routes for the public and support emergency access in the event of an emergency. Necessary due to the climatic and topographic conditions in the region creating severe wildfire risk due to the hot, dry climate and steep terrain resulting in extreme wildfire	3
604.3.10 – Prescribed Herbivory	Administrative, Climatic & Topographical	Allows the use of goats for prescribed herbivory as established in section 142.0412 of the SDMC. Requires approval of the Fire Code Official and the issuance of a permit.	3
605.1- General	Climatic & Topographical	Amends the requirement for spark arrestors to include “other solid or liquid fuel burning equipment or devices” in which solid or liquid fuel is used to prevent the intrusion of embers. Necessary due to the climatic and topographic conditions in the region creating severe wildfire risk due to the hot, dry climate and steep terrain resulting in extreme wildfire conditions.	3
608.2 – General	Administrative, Climatic & Topographical	Amends the language for setback reductions to reference the addition of section 608.2.2 which provides setback requirements from top of slope.	3
608.2.1 – Setback Reduction	Administrative, Climatic & Topographical	Includes increased fire resistance rating of wall(s)/opening(s) as additional alternative method to reduce structure-to-structure ignition allowing for a setback less than 30 feet	3
608.2.2 – Setback from slope	Climatic & Topographical	Provides requirements for setback from top of slope to address the significantly increased risk to the structure when located at the top of	3

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		a slope with flammable vegetation below due to increased fire intensity and convective heat. Necessary due to the climatic and topographic conditions in the region creating severe wildfire risk due to the hot, dry climate and steep terrain resulting in extreme wildfire conditions.	