



County of San Diego

Planning & Development Services

Director's Determination

Date: September 4, 2025
To: PDS Planning/Counter Staff
From: Vince Nicoletti, Director

RE: TINY HOMES ON WHEELS (THOW)

An acknowledgement that Tiny Homes on Wheels meet the definition of a Dwelling per the Zoning Ordinance with guidance for required standards.

Issue

Clarify the allowance of Tiny Homes on Wheels (THOW) as a dwelling per the Zoning Ordinance. This would not change the allowable density or number of units that can be placed on a property.

Background

The County of San Diego supports new and innovative opportunities to create housing and actively seeks to address a shortage of housing in the region. Some of these opportunities include reviewing alternative construction methods, offsite construction, and self-certification options. An additional option includes the allowance of Tiny Homes on Wheels as housing. The County was asked to review the ordinances of other jurisdictions that allow THOW to determine if a similar ordinance could be supported in County jurisdiction.

All of the jurisdictions that were reviewed that allow THOW have made modifications to their local zoning ordinances to include construction standard ANSI A119.5. This standard, established by the American National Standards Institute (ANSI), defines nationally recognized building standards for recreational park models. Additional life and safety features were incorporated into the Park Model Construction Standard to ensure that THOW can be safely used as housing in the region.

This policy would not change the allowable density or number of homes allowed on a single lot. These requirements would still be governed under the Zoning Ordinance and General Plan regulations shall apply. The placement of a THOW must be within a private lot and may not encroach into County road right-of-way.

Relevant Sections of the Zoning Ordinance

Section 1008, Interpretation and Application of the Zoning Ordinance, authorizes the Director to interpret the content or application of the Zoning Ordinance. It is the duty of the Director to ascertain all pertinent facts and render a decision on the interpretation. It is the intent of this Director's Determination to provide guidance as to the acceptance of Tiny Home on Wheels as dwellings per the Zoning Ordinance.

Pursuant to Section 1100 of the Zoning Ordinance a Dwelling is a building or portion thereof used exclusively for residential purposes, including one-family, two-family, and multiple dwellings, but not including hotels, boarding and lodging houses. A Dwelling Unit is a single unit providing complete, independent living facilities for one or more persons, including permanent provisions for living, sleeping, eating, cooking and sanitation, and having only one kitchen.

Buildings are defined as any structure used or intended for supporting or sheltering any use or occupancy. Structures which are built or constructed, an edifice or building of any kind, or any piece of work artificially built up or composed of parts joined together in some definite manner. Pursuant to Section 1110 of the Zoning Ordinance the Building Type, Residential: That group of building types comprising the following:

Single Detached: One dwelling unit, freestanding and structurally separated from any other dwelling unit or building, located on a lot or building site which is unoccupied by any other dwelling unit.

Director's Determination

In review of the definition of a "dwelling" in the County of San Diego Zoning Ordinance, it was determined that THOW, modified in accordance to ANSI standard A119.5, could be considered a dwelling without any revisions to the Zoning Ordinance. With this policy and the requirements provided herein, THOW will be allowed under the definition of a dwelling and could be used as a primary or an accessory dwelling.

Based on this information, it is the Director's determination that THOW will be allowed as dwellings in the County of San Diego under the current Zoning Ordinance. PDS will include amendments to the Zoning Ordinance for future Board consideration as part of a future Zoning Ordinance update to codify this determination. THOW will need to meet all the following requirements listed in Section 1 below to be considered a dwelling. These construction features prioritize life, safety, and ensure that energy efficiencies align with the California Building Code, local zoning ordinances, and State laws that apply to ADU's and Dwellings:

Section 1:

Any THOW intended for habitation within the unincorporated County of San Diego must meet the following requirements:

1. The THOW must be designed and constructed to ANSI A119.5 standard for Park Models. The proposed THOW must contain a certification sticker prior to permit issuance showing that the unit is certified to this standard by an accredited third party inspection agency.
2. Additional Fire requirements for use in the County of San Diego:
 - a. Exterior wall surfaces must be non-combustible (Stucco, Masonry, Cement-Fiber board, Metal, etc.), ignition resistant, heavy timber, or log wall construction. Stucco or Cement Plaster to be a minimum of 7/8" thick. Noncombustible or fire-retardant wood shall be installed per Wildlife and Urban Interface (WUI) guidelines in PDS 664.

- b. All windows shall be dual-glazed units with a minimum of one tempered pane OR shall have a resistance rating of 20 minutes.
 - c. If the THOW has Eaves: Eaves, soffits, and fascia must comply with the requirements for ignition-resistant construction.
 - d. Roofing provided for THOWs shall have a Class A fire rating as installed per the manufacturer.
 - e. All THOWs will be constructed with residential fire sprinkler systems.
- EXEMPTION:** If the unit is being used as an ADU all ADU exemptions would apply.
- f. Direct exiting must be provided from any loft space (as defined by the California Building Code) that would allow for egress from the THOW without leaving the loft.
 - g. All units to have carbon monoxide and smoke detectors.
3. The THOW is not to exceed 430 square feet measured from inside face of walls and must have a minimum of R-13 insulation in all exterior walls.
 4. The THOW is to remain licensed and registered with the California Department of Motor Vehicles.
 5. The THOW cannot move under its own power
 6. The THOW cannot have any slide or pop-out features that increase the habitable square footage.
 7. The THOW shall be located a minimum of six (6) feet from any other structures measured from the face of the structures.
 8. The THOW shall be parked on a paved pad that includes bumper guards, curbs, or other installations adequate to prevent movement of the THOW. The wheels and leveling or support jacks must sit on a paving surface that meets either of the following criteria:
 - a. A parking area for a moveable THOW shall be paved with hard, durable asphaltic paving that is at least two inches thick after compaction, or
 - b. With cement paving at least three inches thick
 9. The THOW shall be connected to electric, water, and sewer utilities with the issuance of required building permits
 10. Extensions. All exterior walls and roof of the THOW shall be fixed with no slide-outs, tip-outs, nor other forms of mechanically articulating room area extensions
 11. Mechanical equipment shall be incorporated into the structure, not on the roof.
 12. The THOW shall be no greater than one story and shall not exceed a maximum height of 16 feet.
 13. The THOW can have a loft for sleeping of up to 150 sq. ft., which is not considered a 2nd story.
 14. If the THOW functions as a single-family dwelling, it must comply with the required main building setbacks, building type, density, and any other applicable zoning regulations.
 15. No additional parking spaces are required for the THOW that is being used as an ADU, and if used as an ADU any displaced parking caused by the placement of the THOW does not need to be replaced.
 16. If THOW is an accessory to a primary residence, it cannot block or remove any required parking spaces for the primary residence.

17. This policy does not change the zoning or allowed density for the property where the THOW is installed. Number of dwellings allowed will be determined on the Zoning building type and allowed density.

A THOW meeting the above standards is eligible for a permit that would allow permanent habitation. A THOW that meets these requirements can be used on any lot that would allow for a single-family dwelling upon issuance of a building permit. When a THOW is removed from a site the owner would need to file for a demolition permit so that the dwelling would be removed from the records.

Vince Nicoletti

Vince Nicoletti, Director
Planning & Development Services