

**SANTA CRUZ COUNTY PLANNING DEPARTMENT POLICY/ORDINANCE  
INTERPRETATION**

Interpretation No.: ATTIC-01 (Attics – allowed features)

Effective Date: May 3, 2010

Revised: Supercedes Robert Bork Memo issued 2/9/89 regarding lofts, storage, attics, etc.

---

**Questions**

- 1) *What features are allowed in attics?*
- 2) *What are the requirements for habitable areas under the roof framing?*

**Applicable Ordinance Section(s)**

13.10.700 –A

13.10.700- H

**INTERPRETATION:**

*Question 1: What features are allowed in attics?*

Allowed features: Insulation\*; windows; plywood flooring; unlimited headroom and floor area; one light fixture; and a water heater and HVAC system along with any dedicated outlets for the appliance as required under the California Building Code.

Prohibited features: Conditioned space; sheetrock; permanent fixed stairs serving the attic area; decks accessed from the attic; electrical outlets other than those required for an HVAC system or water heater; and plumbing fixtures including sinks, toilets and showers. (Prohibited features may be allowed under special circumstances, subject to approval by the Planning Director.)

An area under the roof framing with any of these prohibited features is no longer considered an attic but is instead considered a story.

\* If insulation is installed beneath the roof rafters, then it must also be installed in the floor or ceiling area between the attic and the story below.

*Question 2: What are the requirements for habitable areas under the roof framing?*

A habitable area under the roof framing is considered a story and must comply with all zoning regulations, including parking requirements and restrictions on third stories in the Urban Services Line. Habitable areas must also meet the requirements in the California Building Code for habitable space, including compliant stairs, egress, headroom, area heat, ventilation, and floor framing to support live loads for habitable spaces.

Areas under ceilings or roof framing that adjoin habitable areas will also be considered habitable space if there is compliant headroom at or above 7 feet. In other words,

adjoining “unfinished areas” that are capable of being later finished and made habitable will be considered habitable for the purpose of calculating the floor area, fees, parking and other requirements.

**Reason:**

The Santa Cruz County Code clearly distinguishes between attics, which are non-habitable, and stories, which are by definition part of the habitable floor area. For an area under the roof framing and above the ceiling below to be considered an attic and not a story, it must be non-habitable. This interpretation specifies the features that are appropriate and reasonable for an attic being used for non-habitable storage space, or that are required due to the structure design or for energy efficiency purposes.

Allowed features that are appropriate for storage purposes include one light fixture and plywood flooring. Allowed features that provide for greater flexibility in the structure design and improved energy efficiency include windows, unlimited attic size and ceiling height, and an HVAC system and/or water heater. Insulation is allowed both under the roof rafters and under the attic floor to promote greater energy efficiency. To prevent the attic from being considered part of the habitable portion of the structure from a Building Code standpoint, if the area beneath the roof rafters is insulated, then the area under the attic floor must also be insulated. The layer of insulation between the attic and the rest of the structure isolates the attic from the conditioned portion of the structure, ensuring that the attic remains unconditioned space.

The following features are not allowed in attics, since they are not appropriate for a storage area and could facilitate the use of the attic as habitable space: conditioned space (area heating or air-conditioning), sheetrock, permanent fixed stairs, more than one light fixture, outlets other than those required for an HVAC system and/or water heater, plumbing features, and decks accessed from the attic.

An additional purpose of this interpretation is to ensure that attics and areas under the roof framing being used as habitable space comply with the health and safety requirements in the California Building Code. Applicants should check with Building staff regarding a proposed attic or story, proposed alterations to an existing attic, or proposed conversion of an attic to a habitable area, to ensure that they comply with all Building Code requirements. Conversions to habitable space will be subject to all fees and requirements noted above for habitable stories.

---

Kathy M. Previsich, Planning Director

---

Date