**Questions to Sonoma County Regarding Request for Certification October 12, 2020**

At the September 22, 2020, meeting of the Joint Committee of the Board of Forestry and Fire Protection (Board), Board staff were directed to provide questions to Sonoma County relating to the Board’s potential certification of Sonoma County’s fire safe ordinance. The county’s responses to the following questions will provide necessary information for the Board to properly evaluate whether the county ordinance satisfies the legal standard for certification as equaling or exceeding the SRA Fire Safe Regulations.

As a preliminary matter, the Board acknowledges that many provisions of the county ordinance exceed the state’s minimum standards. The Board commends Sonoma County for its commitment to fire safety in the State Responsibility Area (SRA), and the following questions do not, in any way, detract from the Board’s appreciation for those efforts. Further, as the applicable statute and regulations explicitly state, the SRA Fire Safe Regulations do not supersede provisions of a local ordinance that exceed the state minimum standards. However, the legal standard for certification requires that the Board be satisfied that *all* provisions of the SRA Fire Safe Regulations have a counterpart in the local ordinance that meets or exceeds the respective state minimum standard. Accordingly, the following questions focus on areas where supplemental information or clarification is necessary to allow the Board to properly evaluate Sonoma County’s request for certification.

Sonoma County has directed Board staff’s attention to additional documents that it contends are relevant to certification, including an Administrative Policy and Appendix D of the California Fire Code, the latter of which Sonoma County has adopted with various local amendments. Due to the inclusion of these additional documents, Board staff determined it was necessary to engage in a thorough review of the documents in advance of the next Board meeting, which includes giving a “fresh look” to previously reviewed documents, including Ordinance 6296 and Ordinance 6318. The following represents the results of an in depth review of Sonoma County’s fire safe ordinance documents.

1. Administrative Policy
   * 1. Ordinance 6318, Section 13-25(f), page 5, specifies that existing roads must meet the standards in the “Administrative Policy for Fire Safety Evaluation of Existing Roads.”
     2. At the September 22, 2020, Joint Committee Meeting, Board Members expressed concern about Sonoma County Ordinance Section 13-25(f), which exempts “An existing road serving a proposed development on a legal parcel subject to Chapter 13, Article V…” and requires that the existing road comply with the Administrative Policy.
        1. What is the definition of an existing road as that term is used in the Sonoma County ordinance?
        2. How is this exemption consistent with the scope of the exemptions in the SRA Fire Safe Regulations, which, as they relate to roads, exempt only those roads that are “used solely for agricultural, mining, or the management and harvesting of wood products.”?
        3. Does the existing road exemption in 13-25(f) supersede or otherwise expand the exemptions in the SRA Fire Safe Regulations? For example, is a road that is currently used solely for agricultural, mining, or wood products - and is therefore exempt under the Fire Safe Regulations - also an existing road under Section 13-25(f) such that only those requirements in 13-25(f) apply? If so, this would be impermissible. The scope of the Section 13-25(f) exemption and its interrelationship with the other exemptions needs to be clarified for the Board to determine whether this meets or exceeds the SRA Fire Safe Regulations.
     3. At the September 22, 2020, Joint Committee Meeting, Board Members also had questions about the distinctions and different standards in the Administrative Policy for private roads, public roads, ministerial approvals, and discretionary approvals. It was unclear what these standards were, and thus makes it difficult, or impossible, for the Board to determine whether they meet or exceed the minimum standards in the SRA Fire Safe Regulations.
        1. As the SRA Fire Safe Regulations minimum standards apply to all roads and driveways, whether public or private, and do not have separate standards for discretionary and ministerial approvals, all roads must satisfy the minimum standards in the SRA Fire Safe Regulations, regardless of how the road is characterized in an ordinance. What are the standards in the Administrative Policy for each of these categories and how do these standards meet or exceed the minimum standards in the SRA Fire Safe Regulations? For example, with respect to emergency access and egress (Article 2 of the Regulations), the specific standards in sections 1273.01 through 1273.09 address:

\*Width - generally requiring two ten-foot traffic lanes;

\*Roadway surface – must support at least 75,000 pounds; driveways 40,000;

\*Grades – no more than 16%, with an exception up to 20% with mitigation;

\*Radius – generally no curvature of less than 50 feet;

\*Turnarounds – required on dead-end roads and driveways;

\*Roadway turnouts – minimum of 12’ wide, 30’ long, 25’ taper;

\*Road and Driveway Structures – signing and bridge requirements;

\*Dead-end Roads – maximum lengths based on parcel zone sizes; and

\*Gate Entrances – gate sizes and locations.

* + - 1. Where in the Administrative Policy are the standards that govern each of these requirements for ministerial approvals, discretionary approvals, private roads and public roads?
      2. For convenience and reference, please complete the following table by filling in the specific ordinance section or Administrative Policy section that addresses the specified SRA Fire Safe Regulation.
      3. In addition to the table, where in the Administrative Policy are the standards for ministerial approvals, discretionary approvals, private roads and public roads with respect to Article 5 of the Fire Safe Regulations, section 1276.01 (Setback for Structure Defensible Space) and 1276.02 (Maintenance of Defensible Space Measures)?

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|  | County Ordinance or Administrative Policy Section for Existing Roads that Meets or Exceeds the SRA Fire Safe Regulation Minimum Standard | | | | | |
| Existing Public Road | Existing Private Road | Discretionary Approval – Private Road | Discretionary Approval – Public Road | Ministerial Approval – Private Road | Ministerial Approval – Public Road |
| Fire Safe Reg. Minimum Standard |  |  |  |  |  |  |
| 1273.01:Width Two 10’ lanes |  |  |  |  |  |  |
| 1273.02:Surface  75,000/40,000 lbs |  |  |  |  |  |  |
| 1273.03:Grades  16%/20% |  |  |  |  |  |  |
| 1273.04:Radius  50 feet |  |  |  |  |  |  |
| 1273.05: Turnarounds |  |  |  |  |  |  |
| 1273.06:Turnouts |  |  |  |  |  |  |
| 1273.07:Road & Driveway Structures |  |  |  |  |  |  |
| 1273.08: Dead-end roads |  |  |  |  |  |  |
| 1273.09: Gate Entrances |  |  |  |  |  |  |

1. Appendix D
   1. Ordinance 6296, Section 13-17(b)(125-140), page 43
   2. Appendix D of the California Fire Code is adopted by the County, with amendments. However, compliance with the California Fire Code does not ensure compliance with the minimum standards of the SRA Fire Safe Regulations. For instance, Section D103.2 of Appendix D authorizes road grades in excess of 10% as approved by the fire code official. Yet that standard does not satisfy the SRA Fire Safe Regulation standard in 14 CCR § 1273.03 that caps road grades at 20%. Thus, county adoption of California Fire Code Appendix D is relevant to certification only to the extent that those standards meet or exceed the SRA Fire Safe Regulation standards.
   3. Section D101.1 specifies that one or two family residential dwellings, certain detached utility buildings, and certain agriculturally exempt buildings “may comply with the fire apparatus access road requirements of the Sonoma County Fire Safe Standards.”
      1. The use of the term “may” makes this standard optional, not required, and thus it does not constitute a required minimum standard that the Board can compare to the standards in the SRA Fire Safe Regulations.
      2. What does “may comply” mean? Can some one-family residential dwellings comply with the fire apparatus access road requirements in Appendix D, and others comply with the requirements in the Sonoma County Standards?
      3. How does a residential dwelling comply with the Sonoma County Standards when “residential dwelling” is not defined in those Standards, and no standards exist in the County Standards for “fire apparatus access road,” specifically?
      4. How does a residential dwelling comply with the fire apparatus access road requirements in Appendix D when those requirements are deleted or amended to cross reference requirements in the Sonoma County Standards, and the Sonoma County Standards have the issues identified Question 2.2?
   4. County amendment to Section D102.1 establishes alternative standards for access roads as either the California Fire Code standard “or as approved by the fire code official.” Identify the minimum standard that a fire code official could approve. What standards constrain the fire code official’s discretion to approve an access road that does not meet or exceed the SRA Fire Safe Regulations?
   5. County amendment to Section D103.2 authorizes road grade “in accordance with the [Sonoma County] Fire Safe Standards or as approved by the fire code official.” Identify the maximum grade that a fire code official could approve. What standards constrain the fire code official’s discretion to approve a road grade road that does not meet or exceed the minimum standards of the SRA Fire Safe Regulations?
   6. County amendment to Section 103.4 regarding dead-end roads eliminates the standards established in Table D103.4 and replaces it with “in accordance with the Sonoma County Fire Safe Standards or as approved by the fire code official.” What standards constrain the fire code official’s discretion to approve a road grade road that does not meet or exceed the minimum standards of the SRA Fire Safe Regulations?
   7. As the above-referenced queries demonstrate, the language “or as approved by the fire code official” makes these sections meaningless as far as required minimum standards. The fire code official can authorize a less standard, or approve it with no minimum standards at all. Thus, none of these sections can be used as a basis to show that the Sonoma County standards meet or exceed the SRA Fire Safe Regulations.
2. Definitions
   1. Ordinance 6296, Section 13-6, page 2
   2. The definitions provided in Ordinance 6296, Section 13-6, page 2, govern the definitions used in Chapter 13 of the Sonoma County Code, including Article V, the Fire Safe Standards.
   3. The introductory language of this section states “Definitions are also found in the California Code of Regulations, Title 24, adopted and amended by the County of Sonoma and California Code of Regulations, Title 14 Natural Resources Code, Division 1.5, Chapter 7, Subchapter 2, Article 1-5, SRA Fire Safe Regulations. Unless the provision of context requires otherwise, the definitions contained in this section shall govern the construction of this chapter.”
      1. If definitions are “also found” in Title 24 and Title 14, but “the definitions contained in this section shall govern the construction of this chapter,” what role do the definitions in Title 24 and Title 14 play in understanding how these Standards are applied, and what the Standards are?
   4. The defined term “agricultural operations” is quite broad.
      1. How is it determined what kinds of crops or livestock qualify as “agricultural operations?” Namely, does the County consider cannabis or hemp an agricultural operation? Does that consideration include indoor cultivation?
   5. Road definitions are conflicting and inconsistent. There are many outdated definitions from previous versions of the State Fire Safe Standards (such as “roadway” and the definition for “driveway”), definitions that conflict with each other (the definition for “driveway” versus “private road”), defined terms that are not used in any other section of the County Standards (“fire apparatus access road”), and terms for which County Standards are applied, but the term is undefined (“fire access road”).
      1. Regarding the definition of “public roads” - Are there roads in the county that are part of the “county road system” (see SHC § 941) that are not “county highways?”
      2. If so, how are those defined and what road standards are applied to them?
      3. If not so, then are all “public roads,” as defined in these Standards, subject to the 40-foot wide requirements for “county highways” in SHC § 906?
   6. The term “development approval” is defined, and is not in conflict with the SRA Fire Safe Regulations. However, the term “development” is used frequently, and “development” is not defined.
      1. Is “development” defined? Where?
   7. There are several terms for buildings and roads that lack clarity.
      1. Local ordinance does not specify whether manufactured homes, etc., are considered “residential buildings.” Where are fire safe standards for manufactured homes, mobile homes, etc. (see § 1270.02(a)(2) for a complete list) addressed?
   8. The definition for “private road” in combination with the definition for “residential building” does not meet the SRA Fire Safe Regulations for the application of road requirements versus driveway requirements.
   * County definition: “Private road” means any way or place in private ownership that provides vehicular access to more than one (1) parcel, to a commercial building or agricultural operation on a single parcel, or to more than two (2) residential buildings or two (2) residential buildings, containing more than three (3) dwelling units, on a single parcel.
   * County definition: ““Residential building” means any one-or two-family dwelling containing a Group R-3 occupancy, or Group U occupancy accessory to a Group R-3 occupancy as defined in the county building code.
   * Per the definitions in the State Fire Safe Standards (see “residential unit” and “road” in § 1271.00), a vehicular access serving three two-family homes is serving six residential units, which requires the vehicular access to meet the “road” standards. However, under the County definitions for “residential building” and “private road,” these three two-family homes are only three residential buildings, which would allow for the less restrictive County driveway standard to be used instead of the County road standard. The definition of “residential building” in the County Standard uses the term “dwelling units” but does not define it. As written, the definition of a “private road” in conjunction with “residential building” does not meet or exceed the State Fire Safe Regulations.
     1. The County definition of “private road” contains a possible editorial or typographical error – should the definition read “*“Private road” means any way or place in private ownership that provides vehicular access to more than one (1) parcel, to a commercial building or agricultural operation on a single parcel, or to more than two (2) residential buildings or two (2) residential buildings, containing NO more than three (3) dwelling units, on a single parcel.*” ?
     2. Please provide clarity regarding the definition of a “private road.” What is the number of “residential buildings” where access to those buildings can no longer be provided by a driveway, but a road?
3. Scope and Applicability
   1. Ordinance 6318, Sections 13-22.01 through 25, pages 2-5
   2. Section 13-22.01 (page 2) states that the purpose of this set of County Standards are established for fire protection in the SRA, and LRA “when authorized by Sonoma County Fire Code as amended when not subject to other regulated building standards.”
      1. Although the Board is concerned mostly with the standards applicable to the SRA, this language might be confusing or present inconsistencies when compared to other sections relating to the scope and applicability of these County Standards.
   3. Section 13-23 discusses appeals and appeals process.
      1. Do the cross-referenced appeals processes (Chapter 25 and 26) require the consultations and findings required in § 1270.06(d) and (e)? Please provide specific section and page numbers if so.
      2. Keeping in mind that the Fire Safe Regulations do not have any exemptions except for roads used exclusively for agriculture, mining, and timber harvesting, please identify how that 13-25(h), (i), and (j) meet or exceed the Fire Safe Regulations.
   4. The County should note that it appears that their local Standards do not include an exemption for rebuilding structures damaged in a wildfire. If their Standards are certified as meeting or exceeding the Board’s regulations, there would be no such exemption available for County residents to utilize if their structures are destroyed or damaged.
   5. Section 1270.03(a) and (b) of the Fire Safe Regulations requires local jurisdictions to provide notice of project applications within the SRA to the Director of CAL FIRE or their designee, and grants the Director or their designee the authority to review and make recommendations on those permits.
      1. Is there a process for these submissions outlined in the Sonoma County Ordinance? If so, where?
4. Additional Questions regarding the Administrative Policy:
   1. Ordinance 6318, Section 13-25(f), page 5, specifies that existing roads must meet the standards in the “Administrative Policy for Fire Safety Evaluation of Existing Roads.”
   2. The Administrative Policy makes an unsupported, conclusory statement that the requirements in the County Standards and the Administrative Policy meet or exceed the Board’s minimum standards. This is a determination for the Board to make. **This statement must be deleted.**
   3. A Fire Inspector shall perform “a fire access road evaluation.”
      1. “Fire access road” is an undefined term. Please define it or provide a specific ordinance, section number, and page number for this term.
      2. The evaluation does not appear to encompass driveways. How are existing driveways addressed in the County under the Administrative Policy? Is the Fire Inspector’s evaluation written and available to the public?
   4. “The evaluation shall confirm that the proposed development meets or exceeds the below requirements, and the proposed development shall be reasonably accessed and served in the case of a wildfire, with adequate ingress, egress and the capacity for concurrent evacuation and emergency response.”
      1. **The term “reasonably” must be deleted**; the State Fire Safe Standards do not provide for such qualifying statements.
      2. Assuming the term “reasonably” is deleted, is this “accessed” determination independent of the determination that the minimum county road standards are satisfied, or, if the minimum county road standards are satisfied is this sufficient to support the “accessed” requirement?
      3. If the requirement that the development “shall be accessed and served in the case of a wildfire, with adequate ingress, egress and the capacity for concurrent evacuation and emergency response” is a separate determination, where in the Administrative Policy are the standards the Fire Inspector uses to make this determination? Do the standards explain what the term “accessed” means?
   5. The “below requirements” as referenced must allow for, at a minimum, concurrent evacuation and emergency response at all times, in order to meet the County’s own standard set forth in this Policy. Please identify how requirements 1-7 provide for concurrent access and evacuation for the entire length of the road in question.
   6. Standard 1: “Any existing private roads shall provide at least a twelve foot road and at least an additional one foot of vegetation clearance on each side of the road.”
      1. The definition for road is “any public or private road.” Without a more specific term, it is unclear if the required 12 feet includes, for example, any required shoulders or striping, additional roadbed infrastructure that is part of the “road” but not a part of the road where someone might typically travel on (perhaps a bike lane or transit system cut out?), etc. The Board cannot determine if this meets or exceeds the Fire Safe Regulations minimums or if it provides concurrent access without this information. The County Standards define the term “traffic lane,” and it might be of use to the County to use that term here, in place of “road.” If the County would not like to use this term, instead please identify how that this standard meets or exceeds the requirements for roads in the SRA Fire Safe Regulations.
      2. Additionally, there is no requirement that the additional two feet of vegetation clearance be a space where vehicles can be accommodated. A road on the edge of a cliff has a foot of vegetation clearance, but certainly does not provide a safe surface for vehicles to pull aside to pass each other. A road may have a ditch or culvert directly adjacent to it – again, that provides a foot of vegetation clearance, but not a safe surface for passage. The County Standards define the term “shoulder,” and it might be of use to the County to use that term here, in place of “vegetation clearance.” If the County would not like to use this term, instead please identify how that this standard meets or exceeds the requirements for roads in the SRA Fire Safe Regulations.
   7. Standard 2: Fire Protection Plan for all residential and commercial developments in the Very High Fire Severity Zones. Sonoma County Code §13-17(b)(92).
      1. The SRA Fire Safe Regulations do not apply to Very High Fire Hazard Severity Zones, so this is not relevant to the Board’s review.
   8. Standard 3: Discretionary approvals
      1. “For discretionary approvals, additional turnouts and turnarounds or other mitigation measures may be required on existing roads to ensure concurrent fire engine access and civilian evacuation.” Didn’t Standard 1 just set the requirements for existing roads, which presumably (based on the introductory language in the Policy) are requirements that should already be providing for concurrent access? Additional turnouts or turnarounds may be appropriate, but not in place of meeting the requirements in Standard 1. In any event, the determination is discretionary and lacks any discernible standards that will ensure it is exercised to secure compliance with the minimum standards of the SRA Fire Safe Regulations.
      2. If all “public roads” are also “county highways,” which are required to have a 40-foot road (see SHC § 906), why are additional standards in the TPW and PRMD Guidelines needed and how are they relevant to the issues addressed in this Policy?
   9. Standard 3.a Minor Subdivisions – As the Board defines a driveway (serving 2 or fewer parcels or four or fewer residential units), this standard might be appropriate. However, the definition of “residential building” in the County Standard considers a two-family home to be a single residential building, whereas a “residential unit” in the SRA Fire Safe Regulations is a single dwelling unit – so a two-family “residential building” (per the County Standard) are actually two “residential units” in the SRA Fire Safe Regulations, and so this standard for minor subdivisions, as well as the cross-referenced Ordinance section, do not meet the qualification for a lesser road standard.
      1. If the County disagrees, please identify how that this exception provides for the same practical effect of the State’s road and driveway standards.
   10. Standards 3.b, 3.c, 3.d – Notwithstanding any issues identified below, these Standards cross-references the relevant sections of County Code and do not immediately present any conflicts with the SRA Fire Safe Regulations.
   11. Standard 4 – Provides that Sonoma County Code applies to roads, but only those parts of roads extended, reconstructed, or improved.
       1. No such qualifiers are contemplated in the Board’s regulations. This Standard presents opportunities for development that utilizes existing, substandard roads to reach their parcels, where then any newly constructed road would be up to these Standards. This also provides for opportunities where part of a road is “reconstructed or improved” and so, for example, a 500 foot long road might have sections that are substandard and sections that are not. Please provide definitions for the terms “reconstructed” and “improved” and any further context for this Standard that may help the Board determine if this meets or exceeds the SRA Fire Safe Regulations.
   12. Standards 5, 6, and 7 - Notwithstanding any issues identified below, this Standard cross-references the relevant sections of County Code and does not immediately present any conflicts with the SRA Fire Safe Regulations.
5. Road and Driveway Standards
   1. One-way Roads, Ordinance 6318, sec 13-35, page 12
      1. The term “dwelling unit” is not defined in the Sonoma County ordinance, but is used in this County Standard.
         1. Identify how that this requirement in section 13-35 meets or exceeds the standard in § 1273.01(b)(1).
      2. Fire Safe Regulations require a turnout in the middle of each one-way road. Sonoma County ordinance only requires a turnout on one-way roads of 500+ feet.
         1. Identify how that this requirement meets or exceeds the standard in § 1273.01(b)(2).
   2. Driveways, Ordinance 6318, sec 13-37, page 14
      1. The County Standard requires a 12-foot traffic lane for driveways.
         1. Identify how that this requirement meets or exceeds the standard in § 1273.01(c), including the unobstructed 14 foot horizontal, and 13.5 foot vertical, clearance requirements.
      2. The County Standard for turnouts on driveways only results in a 22-foot wide road + turnout, as opposed to a 24-foot wide road + turnout in the SRA Fire Safe Regulations.
         1. Identify how that this County requirement meets or exceeds the turnout standard in § 1273.06.
      3. The County Standard regarding the frequency with which turnouts are required on driveways is located in section 13-37(c).
         1. Identify how that this County requirement, particularly the requirement for turnout frequency on driveways longer than 1,320 feet, meets or exceeds § 1273.05(c) and (d).
   3. Grades, Ordinance 6318, Sec 13-31, page 7
      1. Section 13-37(a) lacks enough clarity to determine if the standard in that section meets or exceeds the SRA Fire Safe Regulations (see § 1273.03), in general but also specifically in regard to grades in excess of 16% but less than 20%, and grades over 20%.
      2. Identify how that this County Standard meets or exceeds the requirements in § 1273.03.
   4. Turnouts and Turnarounds
      1. There does not appear to be a single, specific local code section that addresses the standards for turnarounds. Instead, the turnaround standard for “road and driveway structures” is inserted into the various relevant road sections (ie, under one-way roads, two-way roads, etc.). The requirements in those subsections do meet the minimum requirements in the Fire Safe Regulations, but it appears an editorial or typographical error has resulted in this standard with the erroneous referenced to “road and driveway structures” being repeated, rather than referencing the specific road infrastructure for which any given County Standard for turnouts and turnarounds may be addressing.
         1. Please address this. If this is not an error, how do these sections meet or exceed the requirements for turnouts and turnarounds on vehicular infrastructure that are not “road and driveway structures?”
      2. The County Standard for turnouts and turnaround reference the use of a “stub out” design. The State Fire Safe Regulations, and the County Fire Safe Standards, define and utilize the design terms “Hammerhead/T” and “terminus bulb,” but do not reference a “stub out.”
         1. What is a “stub out?” How does a “stub out” meet or exceed the requirements in §§ 1273.05 and 1273.06?
   5. Dead-end Roads, Ordinance 6318, sec 13-36, page 13
      1. The length requirements in the County Standards meet the requirements in the State Fire Safe Regulations, but the State Regulations require the length of a road crossing parcels zoned for different sizes to be determined by the smallest allowable length, not the average, as Sonoma County allows.
         1. How does Section 13-36 meet or exceed the standard in § 1273.08 regarding situations where a dead-end road crossing areas of differing zoned parcel sizes requiring different length limits?
   6. Security Gates, Ordinance 6318, Sec 13-38(c), page 15
      1. Section 13-38(c) is silent on whether approval or authorization for security gates is required.
         1. How does Section 13-38 meet or exceed the requirements in § 1273.09(d)
6. Signing and Building Numbering
   1. Road Signs
      1. Ordinance 6318, sec 13-40(a), page 16, only requires road names on roads serving more than 2 parcels; the Fire Safe Regulations require all roads to have names.
         1. How does Section 13-40(a) meet or exceed the requirement in § 1274.00 for all roads to be named?
   2. Ordinance 6318, Sec 13-41, page 17, relies on “County road standards” to set the minimum requirements for the size of letters, numbers, and symbols on road signs.
      * 1. Where is this standard? What are its requirements? How does it meet or exceed the requirements in § 1274.01(b)?
   3. Addressing for Buildings, Ordinance 6318, sec 13-47, page 19 and Ordinance 6318, sec 13-48, page 19-20
      1. Regarding Ordinance 6318, sec 13-47, “Exceptions,” number 1, page 19, there is a statement the requirements in Section 13-47 may be modified with the approval of the fire code official.
         1. The State Fire Safe Regulations allow no such modifications. How does this meet or exceed the requirements in § 1274.03 and § 1274.04?
      2. Regarding Ordinance 6318, sec 13-47, “Exceptions,” number 2, page 19, there is no specified standard for addresses on buildings to be reflective. However, Exception #2 states “Illuminated address numbers are not required for existing buildings where approved; reflective numbers are to be installed.” Section 13-48(b) also provides for an exception regarding the use of illuminated address numbers.
         1. The State Fire Safe Regulations require all residential buildings to have a reflective address. How does this exception meet or exceed the requirements in § 1274.03(c)?