

## Inspection Area Violation Standards Comparison

**Authorities:** Sonoma County Code Chapter 13A (as amended by Ord. 6542, Dec. 9, 2025) | PRC §§4291-4291.1 | 14 CCR §1299 | BOF General Guidelines (Feb. 8, 2006) | 2025 California WUI Code | Cal. Gov. Code §25845 | H&S §§13114, 14930-14931

**Prepared by:** Fire Marshal / Deputy Chief, SVFD Fire Prevention Bureau

**Source documents:** PRC 4291 (full text) | BOF General Guidelines for Creating Defensible Space (Feb. 8, 2006) | Ord. 6542 (Chapter 13A amendment) | Permit Sonoma Vegetation Management Requirements page (permitsonoma.org)

### Legend

	Same requirement across all applicable areas		Differs from one or more other areas		Not applicable to this parcel type or area		Note / citation guidance
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Violation /Requirement	LRA UNIMPROVED (Unincorporated County)	LRA IMPROVED (Unincorporated County)	SRA UNIMPROVED	SRA IMPROVED	LRA in VHFHSZ IMPROVED *includes City of Sonoma
	LOCAL RESPONSIBILITY AREA (LRA) — County/SVFD Enforcement Authority — SCC Chapter 13A governs		STATE RESPONSIBILITY AREA (SRA) — CAL FIRE Primary / PRC 4291 + 14 CCR §1299 + SCC Chapter 13A		LRA-VHFHSZ — SVFD Authority   SRA Substantive Standards Apply
<b>APPLICABILITY — Does the law attach to this parcel?</b>					
<b>Does the defensible space framework apply?</b>	YES — Chapter 13A applies to all real property in unincorporated county, improved or unimproved. Unimproved LRA parcels have a limited duty under SCC 13A-4(B) only (neighbor-proximity obligations). <i>SCC 13A-4(B); Chap. 13A-7 ('any real property')</i>	YES — Full defensible space framework applies. Zone 1 (0-30 ft) and Zone 2 (30-100 ft) requirements attach to the structure. <i>SCC 13A-4(a); Chap. 13A (enacted per H&amp;S §§14930-14931)</i>	PARTIAL — PRC 4291 does NOT apply (no structure). Chapter 13A applies a limited neighbor-proximity duty under SCC 13A-4(B) identical to LRA unimproved. <i>SCC 13A-4(B); PRC 4291 does not apply (no building or structure present)</i>	YES — Full defensible space framework applies under both PRC 4291 and Chapter 13A. Zone 1 and Zone 2 requirements attach to the structure. 14 CCR §1299 prescriptive guidelines apply. <i>PRC 4291(a); 14 CCR §1299; SCC 13A-4(a)</i>	YES — Full defensible space framework applies. LRA jurisdictional authority; SRA substantive standards imposed by overlay. Improved parcels carry full Zone 1 and Zone 2 obligations. <i>Chap. 13A + PRC 4291(a)(1); 14 CCR §1299</i>
<b>Note:</b> PRC 4291 states: 'A person who owns, leases, controls, operates, or maintains a building or structure...shall at all times do all of the following.' No structure = no PRC 4291 obligation. Chapter 13A is broader — it applies to 'any real property' — but the substantive duties for unimproved parcels are limited to the neighbor-proximity requirements in SCC 13A-4(B).					

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<b>UNIMPROVED PARCEL OBLIGATIONS — SCC 13A-4(B) (Applies equally to LRA and SRA unimproved parcels)</b>					
<b>Flammable/combustible vegetation near neighboring structures</b>	Remove all flammable vegetation and combustible growth within 10 ft of any structure on an adjoining parcel. SCC 13A-4(B)(1)	N/A — improved parcel; full defensible space framework governs instead —	Remove all flammable vegetation and combustible growth within 10 ft of any structure on an adjoining parcel. SCC 13A-4(B)(1)	N/A — improved parcel; full defensible space framework governs instead —	N/A — improved parcel; full defensible space framework governs instead —
<b>Note:</b> SCC 13A-4(B) applies identically to unimproved parcels in both LRA and SRA. There is no difference between the two. The obligation is triggered by the existence of a structure on an ADJOINING parcel, not by anything on the unimproved parcel itself.					
<b>Dead/dying vegetation near neighboring structures</b>	Remove all dead and dying vegetation within 10 ft of any structure on an adjoining parcel. SCC 13A-4(B)(2)	N/A — improved parcel —	Remove all dead and dying vegetation within 10 ft of any structure on an adjoining parcel. SCC 13A-4(B)(2)	N/A — improved parcel —	N/A — improved parcel —
<b>Grass/surface vegetation height near neighboring structures</b>	Grass and combustible surface vegetation within 10 ft of structures on adjoining parcels must be trimmed to less than 4 inches, unless necessary for erosion control. SCC 13A-4(B)(3)	N/A — improved parcel —	Grass and combustible surface vegetation within 10 ft of structures on adjoining parcels must be trimmed to less than 4 inches, unless necessary for erosion control. SCC 13A-4(B)(3)	N/A — improved parcel —	N/A — improved parcel —
<b>Tree pruning near neighboring structures</b>	All trees within 10 ft of any structure on an adjoining parcel must be pruned to at least 6 ft above grade. SCC 13A-4(B)(5)	N/A — improved parcel —	All trees within 10 ft of any structure on an adjoining parcel must be pruned to at least 6 ft above grade. SCC 13A-4(B)(5)	N/A — improved parcel —	N/A — improved parcel —
<b>Note:</b> These are the ONLY defensible space obligations on an unimproved parcel in either LRA or SRA. There is no Zone 1, no Zone 2, no 100-ft perimeter, no spacing requirement, and no chimney/roof requirement on a parcel without a structure. The horizontal spacing and fuel separation standards (14 CCR §1299) do not apply.					

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<b>ZONE 1 (0-30 ft from structure) — IMPROVED PARCELS ONLY</b>					
Remove dead/dying vegetation within Zone 1	N/A — unimproved; see SCC 13A-4(B) above —	Remove all dead and dying vegetation, grasses, shrubs, branches, leaves, and weeds. Maintain shrubs free of dead/dying material. Climbing vines must be dead-material free or removed. SCC 13A-4(a)(1), (a)(10)	N/A — unimproved; see SCC 13A-4(B) above —	Remove all dead and dying vegetation, grasses, shrubs, branches, leaves, and weeds. Maintain shrubs free of dead/dying material. Climbing vines must be dead-material free or removed. SCC 13A-4(a)(1), (a)(10)	Remove all dead and dying vegetation, grasses, shrubs, branches, leaves, and weeds. Maintain shrubs free of dead/dying material. Climbing vines must be dead-material free or removed. SCC 13A-4(a)(1), (a)(10)
<b>Note: Uniform requirement across all improved parcels. Citation differs between LRA (SCC 13A-4) and SRA (PRC 4291 + 14 CCR §1299.03).</b>					
Cut grasses (Zone 1)	N/A — unimproved —	Cut grasses to 6 inches or less. Do not cut to bare mineral soil (erosion). SCC 13A-4(a)(1)	N/A — unimproved —	Cut grasses to 6 inches or less per SCC 13A-4(a)(1). BOF Guidelines also state grass generally should not exceed 4 inches in Zone 2 (more protective in SRA). SCC 13A-4(a)(1); BOF Guidelines (Feb. 2006)	Cut grasses to 6 inches or less per SCC 13A-4(a)(1). BOF Guidelines also state grass generally should not exceed 4 inches in Zone 2 (more protective in SRA). SCC 13A-4(a)(1); BOF Guidelines (Feb. 2006)
Prune tree branches (Zone 1)	N/A — unimproved —	Prune trees to 6 ft from the ground (1/3 of tree height recommended for smaller trees). SCC 13A-4(a)(1)	N/A — unimproved —	Prune trees to 6 ft from the ground. Remove all dead/dying branches adjacent to or overhanging buildings. PRC 4291(a)(5); 14 CCR §1299.03(a)(2); SCC 13A-4(a)(1)	Prune trees to 6 ft from the ground. Remove all dead/dying branches adjacent to or overhanging buildings. PRC 4291(a)(5); 14 CCR §1299.03(a)(2); SCC 13A-4(a)(1)
Remove live flammable ground cover and shrubs (Zone 1)	N/A — unimproved —	LRA Chapter 13A does not contain a specific live vegetation removal standard in Zone 1 equivalent to PRC 4291. General nuisance standard applies — vegetation that creates a fire hazard must be abated. SCC 13A-4(a)(1); Chap. 13A general nuisance standard	N/A — unimproved —	Remove or separate live flammable ground cover and shrubs. Outcome-based standard: fuels maintained so a wildfire under average weather conditions would be unlikely to ignite the structure. Most intensive management in first 30 ft. PRC 4291(a)(1); BOF Guidelines item 1	SRA outcome-based standard applies via overlay — live vegetation management in Zone 1 required. Chap. 13A + PRC 4291(a)(1); BOF Guidelines item 1
<b>Note: This is a key difference. PRC 4291(a)(1) is outcome-based: it requires that fuels be managed so ignition is unlikely under average weather conditions. Chapter 13A's LRA standard focuses primarily on dead/dying material removal and does not contain equivalent outcome-based live vegetation language for Zone 1. On LRA improved parcels, the enforcement basis for live vegetation is the general nuisance authority in 13A-4 and 13A-7.</b>					

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<b>CHIMNEY AND SPARK ARRESTOR — IMPROVED PARCELS ONLY</b>					
Spark arrestor on chimney/stovepipe outlet	N/A — unimproved —	Required on all chimneys/stovepipe outlets. Heavy wire mesh, openings not to exceed 1/2 inch. SCC 13A-4(a)(7)	N/A — unimproved —	Required on all chimneys/stovepipe outlets. Heavy wire mesh, openings not to exceed 1/2 inch. PRC 4291(a)(4) [tree clearance triggers]; SCC 13A-4(a)(7); H&S §13114	Required on all chimneys/stovepipe outlets. Heavy wire mesh, openings not to exceed 1/2 inch. Chap. 13A + SCC 13A-4(a)(7); H&S §13114
Remove tree branches within 10 ft of chimney/stovepipe outlet	N/A — unimproved —	Remove all portions of trees within 10 ft of chimney and/or stovepipe outlets. SCC 13A-4(a)(4)	N/A — unimproved —	Remove all portions of trees within 10 ft of chimney and/or stovepipe outlets. PRC 4291(a)(4); 14 CCR §1299.03(a)(2); SCC 13A-4(a)(4)	Remove all portions of trees within 10 ft of chimney and/or stovepipe outlets. Chap. 13A + PRC 4291(a)(4); SCC 13A-4(a)(4)
<b>Note: Uniform requirement across all improved parcels in all three areas. Citation differs between LRA (SCC 13A-4) and SRA (PRC 4291 + 14 CCR §1299.03).</b>					
<b>ROOF AND GUTTERS — IMPROVED PARCELS ONLY</b>					
Maintain roof and gutters free of combustible debris	N/A — unimproved —	Maintain the roof and gutters of any structure free of leaves, needles, or other dead/dying wood. SCC 13A-4(a)(6)	N/A — unimproved —	Remove leaves, needles, or other vegetation on roofs, gutters, decks, porches, stairways. PRC 4291(a)(6); 14 CCR §1299.03(a)(1); SCC 13A-4(a)(6)	Remove leaves, needles, or other vegetation on roofs, gutters, decks, porches, stairways. Chap. 13A + PRC 4291(a)(6); SCC 13A-4(a)(6)
<b>Note: Uniform ongoing maintenance obligation across all improved parcels. Ongoing duty — not a construction standard.</b>					
Ember-resistant roof construction (Class A/B assembly)	N/A — unimproved —	Not a Chapter 13A ongoing inspection item. Governed by CBC at time of permit for new construction or re-roof. — / 2025 CBC	N/A — unimproved —	Not a PRC 4291 ongoing maintenance item. Class A or B roof assembly required as a construction standard under the 2025 California WUI Code, triggered at new construction or re-roof permit. 2025 WUI Code; 2025 CBC Sec. 708A	Class A or B roof required as construction standard under 2025 WUI Code. Triggered at permit. 2025 WUI Code; 2025 CBC Sec. 708A
<b>Note: Do not cite PRC 4291 or Chapter 13A for ember-resistant roof conditions. This is a WUI Code construction standard, not a defensible space maintenance violation.</b>					

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<b>ZONE 2 (30-100 ft from structure) — IMPROVED PARCELS ONLY</b>					
Prune trees (Zone 2)	N/A — unimproved —	Prune trees to 6 ft from the ground. <i>SCC 13A-4(a)(9)</i>	N/A — unimproved —	Prune lower limbs to at least 6 ft above ground (up to 15 ft on steeper/higher-hazard sites). Prescribed in 14 CCR §1299 Guideline 4b. <i>PRC 4291(a)(1); 14 CCR §1299 Guideline 4b</i>	Prune lower limbs to at least 6 ft above ground (up to 15 ft on steeper/higher-hazard sites). Prescribed in 14 CCR §1299 Guideline 4b. <i>Chap. 13A + PRC 4291(a)(1); 14 CCR §1299 Guideline 4b</i>
Remove dead/dying vegetation (Zone 2)	N/A — unimproved —	Remove dead and dying vegetation from the property. <i>SCC 13A-4(a)(10)</i>	N/A — unimproved —	Remove all dead and dying woody surface fuels and aerial fuels within the Reduced Fuel Zone. Loose surface litter permitted to depth of 3 inches. <i>PRC 4291(a)(1); 14 CCR §1299 Guideline 2</i>	Remove all dead and dying woody surface fuels and aerial fuels within the Reduced Fuel Zone. Loose surface litter permitted to depth of 3 inches. <i>Chap. 13A + PRC 4291(a)(1); 14 CCR §1299 Guideline 2</i>
Horizontal fuel separation / plant spacing (Zone 2)	N/A — unimproved —	No prescriptive spacing formula in Chapter 13A. General standard only: vegetation creating a fire hazard must be abated. No distance multipliers or slope-based formulas in the LRA ordinance. <i>Chap. 13A general nuisance standard; SCC 13A-4(a)</i>	N/A — unimproved. PRC 4291 does not apply without a structure; 14 CCR §1299 does not apply to unimproved parcels. —	Prescriptive spacing per 14 CCR §1299 Plant Spacing Guidelines (BOF Feb. 2006):• Trees: 10 ft (0-20% slope), 20 ft (20-40%), 30 ft (>40%)• Shrubs: 2x height (0-20%), 4x height (20-40%), 6x height (>40%)• Vertical: 3x shrub height between shrub tops and lower branchesPRC 4291(a)(1) is the outcome-based authority; 14 CCR §1299 is the prescriptive implementation. <i>PRC 4291(a)(1); 14 CCR §1299 Plant Spacing Guidelines; BOF General Guidelines (Feb. 2006) item 4a</i>	14 CCR §1299 Plant Spacing Guidelines apply via VHFHSZ overlay:• Trees: 10/20/30 ft by slope• Shrubs: 2x/4x/6x height by slope• Vertical: 3x shrub height <i>Chap. 13A + PRC 4291(a)(1); 14 CCR §1299 Plant Spacing Guidelines</i>
<b>Note: CRITICAL:</b> The prescriptive spacing formula is in 14 CCR §1299 and the BOF General Guidelines (adopted Feb. 8, 2006) — NOT in PRC 4291. PRC 4291(a)(1) is outcome-based only. PRC 4291(a)(2) addresses clearance beyond the property line and must never be cited for horizontal spacing. The spacing formulas apply only to IMPROVED parcels in SRA and LRA-VHFHSZ; they do not apply to unimproved parcels in any area.					

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<b>ROADWAY FRONTAGE — ALL PARCELS (IMPROVED AND UNIMPROVED)</b>					
<b>Vegetation clearance within 10 ft of roadway frontage</b>	Required on all parcels. Within 10 ft of roadway frontage: (1) Remove dead/dying vegetation; (2) Remove tree branches to 6 ft above ground; (3) Trim grasses to 4 inches or less. SCC 13A-4(a)(3)	Required on all parcels. Within 10 ft of roadway frontage: (1) Remove dead/dying vegetation; (2) Remove tree branches to 6 ft above ground; (3) Trim grasses to 4 inches or less. SCC 13A-4(a)(3)	Required on all parcels. Within 10 ft of roadway frontage: (1) Remove dead/dying vegetation; (2) Remove tree branches to 6 ft above ground; (3) Trim grasses to 4 inches or less. SCC 13A-4(a)(3)	Required on all parcels. Within 10 ft of roadway frontage: (1) Remove dead/dying vegetation; (2) Remove tree branches to 6 ft above ground; (3) Trim grasses to 4 inches or less. SCC 13A-4(a)(3)	Required on all parcels. Within 10 ft of roadway frontage: (1) Remove dead/dying vegetation; (2) Remove tree branches to 6 ft above ground; (3) Trim grasses to 4 inches or less. SCC 13A-4(a)(3)
<b>Note: Roadway frontage clearance is uniform across all parcel types and all areas. It is one of the few obligations that applies to unimproved parcels beyond the neighbor-proximity duties.</b>					
<b>ADDRESS NUMBERING — IMPROVED PARCELS ONLY</b>					
<b>Street address numbers posted and visible</b>	N/A — unimproved —	Address numbers clearly visible from roadside, minimum 4-inch height, reflective contrasting color. If structure set back from street, post at driveway and on house. SCC 13A-4(a)(8); Sonoma Co. Code Chap. 13	N/A — unimproved —	Address numbers clearly visible from roadside, minimum 4-inch height, reflective contrasting color. If structure set back from street, post at driveway and on house. SCC 13A-4(a)(8); Sonoma Co. Code Chap. 13	Address numbers clearly visible from roadside, minimum 4-inch height, reflective contrasting color. If structure set back from street, post at driveway and on house. SCC 13A-4(a)(8); Sonoma Co. Code Chap. 13