

Performance Audit of Brush Management on Private Property

Why OCA Did This Study

Brush management plays a critical role in protecting lives and property by reducing the risk that homes would ignite in a wildfire.

Our office conducted and published an [audit in 2023 focusing on brush management of City-owned land](#). This audit supplements that work by focusing on brush management on non-City-owned land, predominantly private properties. The objective of this audit was to:

Determine whether Fire-Rescue’s brush management inspection efforts efficiently and effectively ensure private properties comply with brush management requirements by assessing whether:

- a. Staffing and case assignment practices maximize effective inspection coverage;
- b. Enforcement mechanisms, including reinspections, ensure violations are corrected; and
- c. The fine and penalty structure is sufficient to recover costs, and comparable to other municipalities.

What OCA Found

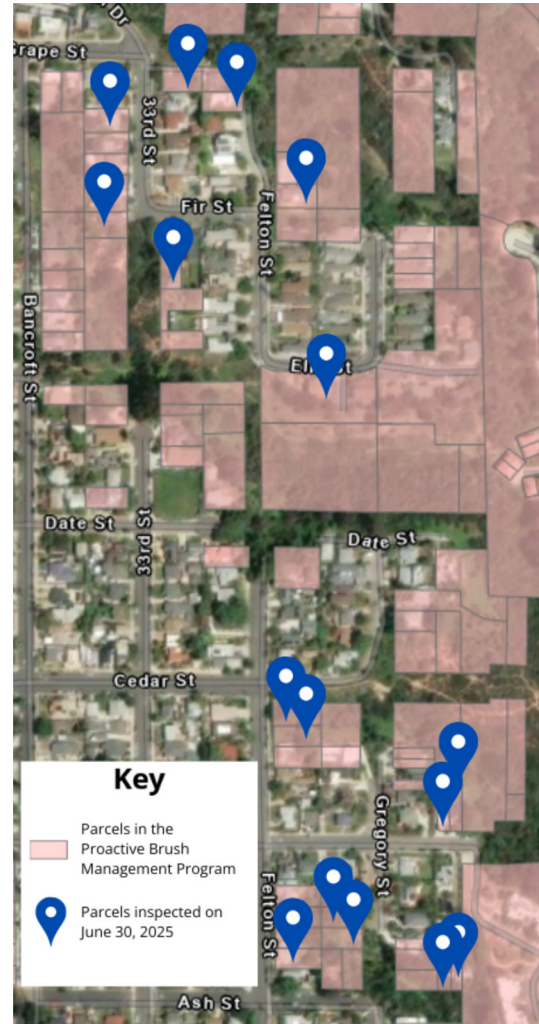
Overall, we found that limited oversight and accountability, lack of follow-through and enforcement, and minimal public reporting have limited the program’s effectiveness at reducing wildfire risk. Specifically:

Finding 1: Fire-Rescue should substantially strengthen inspection efficiency and accountability to better mitigate the risk of wildfire damage and destruction.

- **Inspection goals unmet:** Based on the number of inspections conducted from August 2020 through September 2025, each of the 45,101 parcels would only be inspected about every 8–10 years—far slower than the 1–3 year goal identified by several studies and best practices.
- **Recent reforms, but fewer identified violations:** In early 2025, Fire-Rescue switched from more thorough, but more time-consuming on-site inspections to more limited, but faster visual inspections conducted from public

spaces. While this has led to inspections now being completed at about a 2-year pace, the new process approach is about 30 times less likely to identify a violation that may exist, on a per inspection basis.

Exhibit 14: Inspection Routes Appear Haphazard and Skip Parcels



Source: OCA generated based on proactive inspections completed on July 17, 2025 by one inspector in one area documented in 3Di, Google Maps, and SanGIS/SANDAG Parcel Lookup Tool.

- **Needed productivity standards:** Under both the previous on-site inspection and current visual inspection processes, Fire-Rescue has not established productivity goals, and productivity varied widely between inspectors.
- **Inefficient routing:** Inspectors self-assign their own cases to inspect with relatively little oversight from the supervisor, leading to inefficient routing.

- **Delayed start times:** Although inspections can be assigned remotely, inspectors come to Civic Center Plaza every morning to self-assign their cases, and are generally not expected to begin their inspections until 90 minutes into their shift.
- **Data and system gaps:** Inaccurate data and underutilization of system capabilities has led to some parcels receiving multiple inspections while others were not inspected at all.

Finding 2: Improving inspection follow-through and enforcement is critical to enhance program effectiveness and further mitigate risk to neighborhoods and properties.

- **Limited follow-up on violations:** Of the 910 proactive inspections that identified violations between August 2020 and April 2025, only 747 (82 percent) had a documented reinspection to verify compliance. For complaint-based inspections, follow-up was even less consistent—only 46 percent of cases with violations were reinspected.
- **No penalties or fees assessed:** Despite having authority to impose non-compliance penalties and force abatement after repeated violations, Fire-Rescue assessed no penalties or re-inspection fees from August 2020 through June 2025—even in cases where violations persisted after multiple inspections.
- **Programmatic emphasis on education, but no enforcement:** Fire-Rescue prioritizes community education and outreach, which is commendable. However, we found inconsistent follow-up and \$0 worth of enforcement fees or penalties. Without consistent follow-up and enforcement, property owners have less incentive to maintain defensible space.
- **Notice of Violation template omits key penalties:** The template does not inform property owners of the new \$50 penalty for violations remaining after the second inspection, reducing the deterrent effect.
- **Other municipalities have fee and penalty frameworks for non-compliance that are much more stringent:** Other municipalities assess fees as soon as at the time of the initial inspection, have higher non-compliance fees after the second inspection, and/or begin the abatement process after the second inspection.

- **Limited oversight/reporting of program performance:** Reporting out on program performance is an important mechanism for providing clarity and transparency on overall program effectiveness.

Exhibit 20: Benchmarked Municipalities Have More Stringent and Higher Non-Compliance Fees Compared to the City of San Diego

Municipality	Initial Inspection	Second Inspection	Third Inspection
City of San Diego	\$0	\$50	\$300
City of Berkeley*	\$0	\$115 per quarter hour (15 minutes)	Citation may be issued for fines up to \$500 per day, per violation
City of Beverly Hills**	\$555 If no violations are found, fee is waived	\$555	\$972
City of Los Angeles	\$31 If no violations are found, fee is waived	\$764 + \$1,526 Administrative Fee + Contractor's Lowest Bid Price	N/A
City of Oakland	\$0	\$500	\$500
County of Los Angeles****	\$151 (included in the property tax bill)	\$500 Administrative Fee + \$1,199 Abatement Enforcement Fee****	N/A

Source: OCA generated based on benchmarking with the cities of Berkeley, Beverly Hills, Los Angeles, and Oakland, and the County of Los Angeles.

What OCA Recommends

We made 14 recommendations and Fire-Rescue agreed to implement all 14. Key recommendation elements include:

- Establishing and enforcing productivity standards;
- Monitoring to ensure that the inspection approach is effectively achieving program goals;
- Implementing a process to effectively assign and route proactive inspection cases;
- Completing follow-up inspections for cases with outstanding violations;
- Pursuing enforcement and issuing fees and penalties as appropriate; and
- Improving monitoring and evaluation of the program and its objectives.

For more information, contact Andy Hanau, City Auditor, at (619) 533-3165 or cityauditor@sandiego.gov.