

# Performance Audit of Brush Management on Private Property

**MAY 2026** | OCA-26-08

## Finding 1

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

## Finding 2

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

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CITY OF SAN DIEGO



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The Office of the City Auditor would like to thank staff from the Fire-Rescue Department for their assistance during this audit.



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# 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

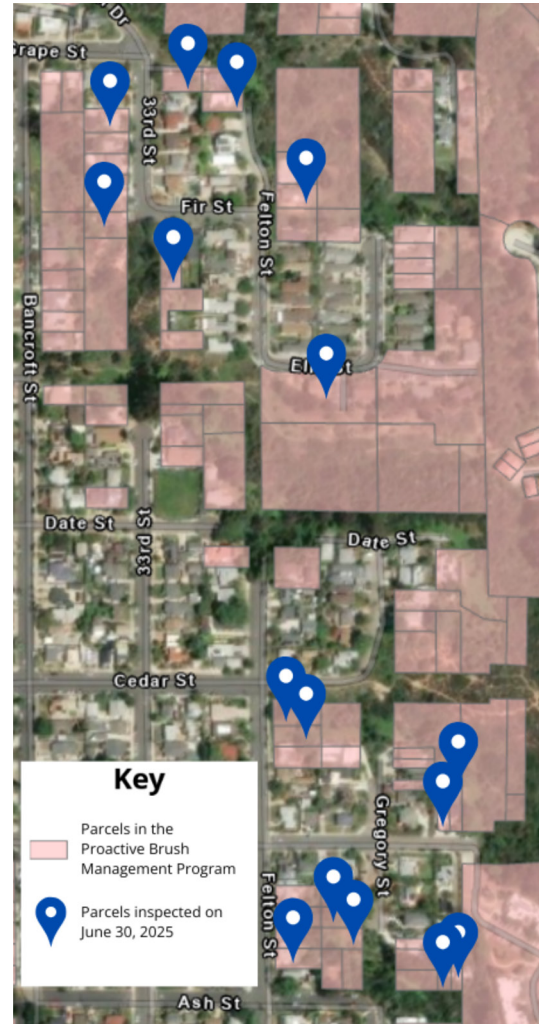
Overall, we found that limited oversight and accountability, lack of follow-through and enforcement, and minimal public reporting have limited the program’s effectiveness at reducing wildfire risk. Specifically:

### 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](mailto:cityauditor@sandiego.gov).

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# Background

Brush management plays a critical role in protecting lives and property by reducing the risk that a home would ignite in a wildfire and therefore also reducing the chance that a burning home would spark fires in nearby homes in the community. Many of the wildland urban interface areas within the City of San Diego (City) are in Very High Fire Hazard Severity Zones because they possess all the ingredients necessary to support large, intense, and uncontrollable wildfires.<sup>1</sup>

The ability to live more safely in this fire environment greatly depends upon the use of “pre-fire activities,” such as managing brush to create defensible space in the event of a wildfire. When property owners and/or residents do not maintain defensible space, they can put their neighbors and the larger community at greater risk of devastating wildfires.

State law and the City require property owners and/or residents in Very High Fire Hazard Severity Zones to comply with brush management regulations, although local jurisdictions are generally not required to proactively inspect parcels for brush management issues. Nevertheless, to enforce these regulations, the Fire-Rescue Department (Fire-Rescue) conducts inspections and issues notices of violation when properties do not meet compliance requirements. Effective oversight of these inspections is essential to ensure that the program achieves its intended purpose: reducing wildfire risk and safeguarding public safety.

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.<sup>2</sup> Brush management is key to reducing the risk of wildfires as identified in numerous reports, including the After-Action Report from the 2007 Witch Creek Fire—a fire that claimed two lives and caused over a billion dollars in damage, including destroying 1,650 structures. Therefore, we conducted a performance audit of the City’s brush management on private property in accordance with the Office of the City Auditor’s (OCA) Fiscal Year (FY) 2025 Audit Work Plan. The objective of this audit was to:

1. 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.

<sup>1</sup> The wildland urban interface is an area or zone where human development meets or mixes with natural vegetation.

<sup>2</sup> Most of the parcels we examined in this audit are private property but approximately 1 percent appear to be on public property. OCA’s 2023 Performance Audit of Brush Management on City-Owned Land focused on mitigation measures on City-owned property specifically, and is available here: [https://www.sandiego.gov/sites/default/files/24-01\\_performance\\_audit\\_of\\_the\\_citys\\_brush\\_mgmt\\_city\\_owned\\_land.pdf](https://www.sandiego.gov/sites/default/files/24-01_performance_audit_of_the_citys_brush_mgmt_city_owned_land.pdf)

## Properties in Very High Fire Hazard Severity Zones have the strictest State Law requirements for brush management.

In California, the three main fire hazard severity zones are very high, high, and moderate. The fire hazard severity zones determine the actions property owners are required to take to reduce wildfire risk. One approach to minimize the risk that a home will ignite from a wildfire is the creation of defensible space—the buffer between a structure and the surrounding area to slow or halt the progress of fire. Properties in a very high fire hazard severity zone must maintain defensible space.

## The Wildfire Prevention and Mitigation section within the Fire-Rescue Community Risk Reduction Division oversees the City's brush management programs.

*The Proactive Brush Management Program is designed to enforce the City's brush management regulations on private property.*

Fire-Rescue's Wildfire Prevention and Mitigation section oversees four brush management programs to ensure privately-owned parcels have appropriate defensible space. As a result of the 2007 wildfires, Fire-Rescue received funding to implement a Proactive Brush Management Program—which is the main focus of this audit report—with the goal to create defensible space throughout the City. This Proactive Brush Management Program is designed to enforce the City's brush management regulations on private property within the wildland urban interface and to educate homeowners on how they can make their homes defensible. Prior to the program, Fire-Rescue responded to citizen complaints of brush management issues. A team of code compliance officers, referred to as inspectors throughout this report, carry out brush management inspections for three of the four programs; inspections under the Annual Weed Abatement Vacant Lot Program are primarily conducted by a contractor. **Exhibit 1** summarizes Fire-Rescue's four brush management programs.

*Exhibit 1*

**Brush Management Inspections are Conducted Under the Proactive Brush Management, Weed Abatement and Brush Complaint, Real Estate Defensible Space, and Annual Weed Abatement Vacant Lot Programs to Ensure Parcels Have Appropriate Defensible Space**

<u>Program</u>	<u>Program Description</u>
<b>Proactive Door to Door Brush Management Program</b>	Proactive inspections of private parcels located on a canyon rim in a Very High Fire Hazard Severity Zone and under the City's responsibility.
<b>Weed Abatement and Brush Complaint Program</b>	Inspections pertaining to brush management complaints.
<b>Real Estate Defensible Space Inspection Program</b>	Inspections of properties, due to their sale, located in a High or Very High Fire Hazard Zone (i.e., "AB 38 inspections").
<b>Annual Weed Abatement Vacant Lot Program</b>	Inspections of privately owned vacant lots that are not in compliance with brush management regulations. Inspections are conducted by a contractor.

Source: OCA generated based on Fire-Rescue's website.

Additionally, beginning in FY2026, the department began offering home risk assessments. Home risk assessments are requested by the property owner and aim to make homes defensible by providing a personalized service to educate homeowners about the purpose of defensible space while making the home defensible and ember resistant against wildfires. Properties are not issued violations and instead inspectors issue recommendations to homeowners so that properties comply with new anticipated State brush management regulations.<sup>3</sup>

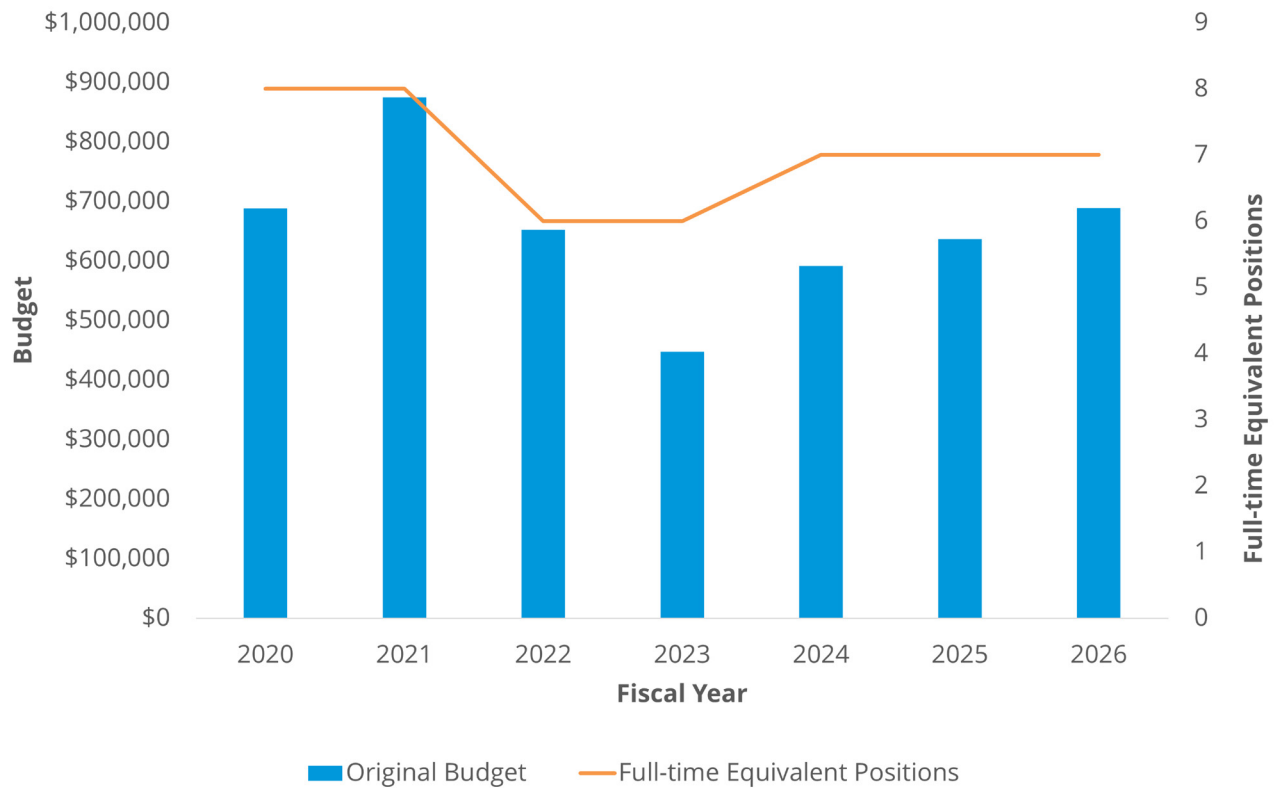
For FY2026, the Wildfire Prevention and Mitigation section is budgeted for \$688,908 and for seven full-time equivalent positions. As shown in **Exhibit 2**, from FY2020 through FY2026, Fire-Rescue's budget for brush management fluctuated year-to-year, but returned to roughly the same level in FY2026 as it was in FY2020, while the number of positions decreased from eight to seven. For FY2026, the section is comprised

<sup>3</sup> Anticipated State brush management regulations pertain to defensible space within the first five feet of a home or structure—referred to as "Zone 0"—which went into effect in February 2026 for new construction and are set to go into effect in February 2027 for existing homes and structures.

of one code compliance supervisor, five code compliance officers, and one clerical assistant. We refer to the code compliance supervisor and officers as inspectors throughout this report.<sup>4</sup>

**Exhibit 2**

**In Recent Years, Fire-Rescue’s Program for Brush Management Inspections on Private Property Has Consisted of About Seven Full-time Equivalent Positions, and a Budget of Nearly \$700,000 Annually**



Source: OCA generated based on budget and staffing reports.

<sup>4</sup> An assistant fire marshal and senior code compliance officer also oversee the Wildfire Prevention and Mitigation section, but these positions are funded outside the Wildfire Prevention and Mitigation section. In FY2026, the senior code compliance officer position became vacant.

# Finding 1

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

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### Finding Summary

Proactive brush management inspections are not required by law, but are widely used as a best practice and identified as a key control to limit wildfire damage, with many sources recommending an inspection frequency of every 1–3 years. Although approximately 220,000 parcels in the City of San Diego (City) are within a Very High Fire Hazard Severity Zone, the Fire-Rescue Department's (Fire-Rescue) Proactive Brush Management Program only focuses on 45,101 parcels. While this is an effort to focus the program's limited resources, we found that a lack of oversight and accountability have severely limited the program's efficiency and effectiveness in reducing the risk of wildfires. Specifically, we found:

- **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 adjacent public spaces. While this has led to inspections now being completed at about a 2-year pace, the new process appears to result in a significantly lower amount of identified violations.
- **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.

To correct these issues and improve the efficiency and effectiveness of the program in reducing wildfire risk, we recommend Fire-Rescue establish productivity goals, establish responsibilities to regularly monitor and evaluate the effectiveness of the program, identify and adopt visual inspection methods that improve the effectiveness of identifying violations, require the supervisor to either assign or approve inspections to ensure appropriateness and routing efficiency, and take steps to maximize the usability of the inspection tracking system.

### **Proactive brush management inspections are not required by law, but are widely used as a best practice and identified as a key control to limit wildfire damage.**

Property owners are responsible for creating and maintaining defensible space. Specifically, State law requires parcels with an occupied dwelling or occupied structure in a Very High Fire Hazard Severity Zone to always maintain 100 feet of defensible space and the City's Brush Management Bulletin Guide<sup>5</sup> prescribes annual pruning requirements because brush grows quickly.<sup>6</sup> Local jurisdictions are generally not required to proactively inspect parcels for brush management compliance unless the parcel is offered for sale and is in a Very High or High Fire Hazard Severity Zone.<sup>7</sup> Although local jurisdictions are not mandated to proactively inspect properties for brush management issues, one of the most common defensible space activities is inspections of properties to assess compliance with brush management.

*Brush management and corresponding inspections are an important mitigation effort, with recommended frequencies of 1–3 years.*

A report from the California Legislative Analyst's Office on promoting defensible space in California, as well as City After-Action Reports, identified brush management and corresponding inspections as an important mitigation effort, with recommended frequencies of inspections ranging from 1–3 years. For example, the 2014 Bernardo Fire After-Action Report noted at the time that parcels subject to brush management regulations were only inspected every three years, but that more frequent inspections would improve compliance and increase defensible space protection. The October 2007 Wildfires After-Action Report noted that additional positions were required for Fire-Rescue to conduct annual brush management inspections of all private parcels in the wildland urban interface in the City.

5 The City of San Diego Brush Management Bulletin Guide can be found here: <https://www.sandiego.gov/sites/default/files/legacy/fire/pdf/brushpdf.pdf>

6 Government Code 51182 requires 100 feet of defensible space from each side and from the front and rear of the structure, but not beyond the property line, except for when State law, local ordinance, rule, or regulation requires a greater distance.

7 State law requires sellers of residential property in a High or Very High Fire Hazard Severity Zone to provide to the buyer documentation stating that the property complies with defensible space requirements or local vegetation management ordinances.

Additionally, as illustrated in **Exhibit 3**, we found that other municipalities have annual brush management programs to ensure that they inspect all the properties they have identified as needing brush management inspections.

**Exhibit 3**

**Other Municipalities Have Brush Management Programs to Ensure They Annually Inspect All Parcels They Have Identified in Their Jurisdiction as Needing Brush Management Inspections**

Municipality	Number of Parcels Inspected Annually
City of Berkeley	11,000*
City of Burbank	2,850**
City of Los Angeles	155,000
City of Oakland	Approximately 25,000
County of Los Angeles	129,543***

\* The City of Berkeley performs an average of 11,000 inspections annually.

\*\* The City of Burbank anticipates this number increasing to approximately 3,100 due to new maps released by the State Fire Marshal on March 24, 2025.

\*\*\* Includes parcels in Very High, High, and Moderate Fire Hazard Severity Zones. The County of Los Angeles Fire Department breaks down inspections into geographic regions: desert, inland, and coastal communities.

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

**Of the 45,101 parcels that Fire-Rescue prioritized for brush management inspections from August 2020 through September 2025, approximately 29,000 were inspected for brush management issues—leaving nearly 16,000 (36 percent) without a documented inspection during that time.**

Although there are approximately 220,000 parcels in the City in a Very High Fire Hazard Severity Zone, Fire-Rescue has prioritized brush management inspections for 45,101 parcels by including these in its Proactive Brush Management Program. However, we found that 16,346 (36 percent) of those parcels did not have a documented inspection for the period we reviewed.<sup>8</sup> As shown in **Exhibit 4**, we found that only approximately 29,000 (64 percent) of the parcels in the Proactive Brush Management Program had a documented brush management

<sup>8</sup> In early 2025, Fire-Rescue changed its approach in how it conducts proactive brush management inspections. Our review of these 45,101 parcels includes inspections conducted from August 2020 through September 2025 and covers both the previous and new inspection approaches.

inspection under one of the four brush management inspection programs: Proactive Brush Management, Annual Weed Abatement Vacant Lot, Weed Abatement and Brush Complaint, and Real Estate Defensible Space.

**Exhibit 4**

**Of the 45,101 Parcels in the Proactive Brush Management Program, 16,346 (36%) Did Not Have a Documented Brush Management Inspection Under Any of Fire-Rescue’s Brush Management Inspection Programs**

Number and Type of Inspection	Number of Parcels	Percent of Parcels
0 Documented Inspections	16,346	36%
1 Documented inspection: proactive, complaint, real estate defensible space, and/or annual weed abatement vacant lot	27,744	62%
2 Documented inspections: proactive, complaint, real estate defensible space, and/or annual weed abatement vacant lot	996	2%
3 Documented inspections: proactive, complaint, real estate defensible space, and/or annual weed abatement vacant lot	15	0%
<b>Total</b>	<b>45,101</b>	<b>100%</b>

Source: OCA generated based on data from Fire-Rescue’s inspection software from 3Di and Interra, and inspection data provided by Fire-Rescue conducted by a contractor.

When we reviewed the data to only include brush management inspections conducted under the Proactive Brush Management Program, we found that 18,188 (40 percent) of the parcels did not have a documented proactive brush management inspection in the last five years; a decrease of about 1,800 parcels compared to when we include all four inspection programs. As shown in **Exhibit 5**, we found that of the 45,101 parcels in the Proactive Brush Management Program, 24,222 had one documented proactive inspection and another 2,911 parcels had two or more documented proactive brush management inspections.

*Exhibit 5*

**Of the 45,101 Parcels in the Proactive Brush Management Program, 18,188 (40%) Did Not Have a Documented Proactive Brush Management Inspection in the Last 5 Years**

Number and Type of Inspection	Number of Parcels	Percent of Parcels
Parcels <b>Without</b> a Documented Proactive Inspection	18,188	40%
Parcels With <b>1 Documented Proactive Inspection</b>	24,002	53%
Parcels With <b>2 or More Documented Proactive Inspections</b>	2,911	7%
<b>Total</b>	<b>45,101</b>	<b>100%</b>

Source: OCA generated based on data from Fire-Rescue’s inspection software from 3Di and Interra.

This means that large areas of the City are not receiving inspections. For example, when we reviewed inspection data for 37 parcels in Talmadge, adjacent to where the 2024 Montezuma Fire occurred, and as shown in **Exhibit 6**, we found that only one of the parcels had a documented inspection from August 2020 through April 2025. In addition, we found that the single parcel with the documented inspection was inspected in response to a brush complaint.

*Exhibit 6*

**From August 2020 Through April 2025, Only One Parcel Adjacent to Where the 2024 Montezuma Fire Occurred Had a Documented Brush Management Inspection**



Source: OCA generated based on SanGIS and SANDAG Regional Data Warehouse, CalFire, and inspection data from Interra.

**In early 2025, Fire-Rescue changed its approach in how it conducts proactive inspections; although this change speeds up the pace of inspections, it appears that the new inspection approach is not as effective at identifying violations that may exist.**

Prior to early 2025, inspections under the Proactive Brush Management Program were more thorough, but in recent years, we found that it would take 8–10 years to inspect all 45,101 parcels in the program. Under the more thorough approach, on the day of the inspection, inspectors would first leave written notice on the properties they were going to inspect to inform residents of the purpose of the inspection. Then, inspectors would proceed to knock on residents' doors to request access to the property to conduct the inspection.

However, in early 2025, Fire-Rescue changed how it conducts proactive inspections by no longer requiring that inspectors access the property to complete the inspection; thus, inspectors no longer leave written notice on doors and now conduct the inspection from the front of the parcel or from a side street or other adjacent public space. Fire-Rescue indicated that it has not evaluated whether the new inspection approach is as effective as the old approach at identifying brush management violations that exist.

However, as a result of this change, proactive inspections now take less time to complete and we estimate that Fire-Rescue is on pace to inspect all 45,101 parcels in its Proactive Brush Management Program in just under 2 years, far faster than the 8–10 years the department was taking under the more thorough approach.

*The new inspection approach may be less effective at identifying violations.*

Although the new inspection approach allows Fire-Rescue to get through its proactive inspections at a faster pace, we found that the new approach may be less effective at identifying violations. Specifically, we found that of the estimated 9,892 proactive inspections<sup>9</sup> that were conducted under the faster inspection approach, only 14 (0.14 percent) had a documented violation at the time of the initial inspection.<sup>10</sup> In contrast, we found that of the 21,738 proactive inspections conducted under the previous more thorough inspection approach, 910 (4 percent) had a documented violation at the time of the initial inspection.

<sup>9</sup> The inspection data contained 12,311 proactive inspection records. However, we estimate that approximately 2,419 inspection records were duplicate records as the parcel number and inspection date and time matched another record.

<sup>10</sup> In addition, 13 of the 14 violation determinations were from a single inspector.

Thus, as illustrated in **Exhibit 7**, while the new approach has accelerated the pace of inspections from about once every 8–10 years to once every 2 years, and is thus approximately 4–5 times faster than the more-intensive previous approach, the new approach is about 30 times less likely to identify a violation that may exist, on a per inspection basis.

**Exhibit 7**

**Under the New and Faster Inspection Approach, Fire-Rescue is 4–5 Times Faster at Completing Inspections But 30 Times Less Likely to Identify a Violation**

Inspection Approach	Inspection Frequency	Number of Inspections	Violation Rate	Expected Violations Identified
Previous Approach	8-10 years	45,101	4.19%	1,890
Current Approach	2 years	45,101	0.14%	63

Note: We found that the violation rate under the new inspection approach is 0.14% compared to the 4.19% under the previous inspection approach. To determine how likely Fire-Rescue is to identify violations under the new inspection approach, we used the previous and current violation rate and assumed the number of completed inspections to be 45,101, that is, all of the parcels under Fire-Rescue’s Proactive Brush Management Program. Under this assumption, this means that under the new inspection approach, Fire-Rescue is likely to identify 63 parcels with violations compared to 1,890 under the previous inspection approach, which is 30 times less likely when compared to the previous inspection approach. We rounded the expected violations identified to the nearest whole number.

Source: OCA generated based on analysis of inspection data from Interra and 3Di data.

While it is commendable that Fire-Rescue has experimented with alternative approaches to speed up the process and expand inspection coverage, these results appear to suggest that the previous approach was significantly more effective at identifying violations.<sup>11</sup> The results

<sup>11</sup> We analyzed proactive inspection data in Interra, which captures proactive inspections conducted under the previous more thorough inspection approach, and found that 4.19% of the inspections had a documented violation at the time of the initial inspection. We then analyzed data in 3Di, which captures proactive inspections conducted under the new inspection approach from a public point, and found that 0.14% of the inspections had a documented violation at the time of the initial inspection. We compared these percentages that found that Fire-Rescue is 30 less likely to identify a violation that may exist under the new inspection approach. We found that some other jurisdictions also conduct brush management from a public vantage point. For example, we found that CalFire; City of Hayward, which has a partnership with the Fairview Fire Protection District to carry out brush management inspections; and City of Corona also conduct their brush management inspections from a public vantage point, which in turn allows them to increase their inspection coverage. However, a report from the California Legislative Analyst’s Office on wildfire preparedness noted that a local jurisdiction in the State inspected in the same area as CalFire and found significantly lower compliance than CalFire did, thus, questioning the effectiveness of conducting inspections from a public vantage point. The report from the California Legislative Analyst’s Office is available at: <https://lao.ca.gov/reports/2021/4457/defensible-space-093021.pdf>

underscore the importance of effective program monitoring as Fire-Rescue goes forward to ensure that whatever approach is used is effectively achieving the program's purpose.

***There are no formal performance targets for the number of proactive inspections that inspectors should complete, and expectations differ between management and inspectors.***

Performance expectations should be documented, measurable, and monitored. The California Legislative Analyst's Office notes that ensuring that local agencies can meet a baseline number of inspections each year is important. However, we found that Fire-Rescue does not have formal performance targets for the number of proactive inspections inspectors should complete daily. Prior to Fiscal Year (FY) 2024, the department had a Key Performance Indicator on the percent of privately-owned parcels subject to brush management regulations inspected for compliance annually, but in the FY2024 Budget, the department eliminated this Key Performance Indicator because it did not have an annual cycle for all privately-owned parcels subject to brush management regulations, only for canyon-rim parcels.

Under the new inspection approach, inspectors told us they have an informal goal of completing 5–7 proactive inspections per day, but that this is not formally documented. According to inspectors, this informal goal is based on the time it takes to complete proactive brush management inspections after completing real estate and complaint inspections and home risk assessments. In contrast, management indicated that it expects each inspector to complete between 25 and 50 proactive brush management inspections per day with the new and faster inspection approach, in addition to the other brush management inspections. However, as shown in **Exhibit 8**, we randomly selected 7 days of proactive inspections to review and found that the number of inspections completed varied and ranged from 0 to 115 inspections, with most days indicating fewer than 25 proactive inspections completed, per inspector per day.

**Exhibit 8**

**Fire-Rescue Does Not Have Formal Targets for the Number of Proactive Inspections Each Inspector Should Complete Daily, Which Likely Contributes to the Variation in the Number of Inspections Completed by Inspectors**

	Inspector A		Inspector B		Inspector C		Inspector D	
Date	Proactive	Real Estate	Proactive	Real Estate	Proactive	Real Estate	Proactive	Real Estate
June 30, 2025	25	1	46	0	24	0	None recorded	
April 11, 2025	0	4	None recorded		None recorded		15	2
August 7, 2025	0	3	None recorded		None recorded		1	2
June 18, 2025	None recorded		None recorded		None recorded		31	2
July 17, 2025	16	1	None recorded		115	0	0	1
July 2, 2025	15	2	None recorded		0	6	64	0
April 2, 2025	None recorded		24	0	None recorded		None recorded	

Note 1: The table excludes inspections completed by the field supervisor.

Note 2: We added the term “none recorded” to days where neither a proactive or real estate defensible space inspection was documented by the inspector as the inspector might have been off from work or worked on non-inspection related tasks on that day.

Source: OCA generated based on inspection data documented in Fire-Rescue’s inspection software, 3Di.

Fire-Rescue indicated that it is working to analyze how it currently conducts proactive inspections to establish formal goals for the number of proactive inspections inspectors should complete. For example, Fire-Rescue noted it has identified the number of work hours per inspector available after time spent on other work functions to help establish performance targets, but wants to ensure that the quantity of inspections is not prioritized over the quality of the inspections.

***Inspectors self-assign inspection cases, which likely contributes to scattered inspections.***

Although Fire-Rescue has a mechanism to centrally assign inspection cases to inspectors, the department relies on inspectors to self-assign inspection cases. Staff self-assign cases on a first come, first served basis with consideration given to real estate defensible space inspections, home risk assessments, and complaint inspections over proactive inspections. As noted below, because inspection cases cover a wide area across the City, this contributes to inspections being conducted scattered throughout the City on any given day.

***Cases are not assigned in advance and inspectors limit the number of cases they self-assign to avoid locking colleagues out of cases, but this approach contributes to reduced inspections.***

Inspectors self-assign cases daily and limit the number of cases they assign themselves to prevent locking cases. Once an inspection case is assigned to an inspector in Fire-Rescue's 3Di software system, the case is locked until the inspection is complete to avoid others from simultaneously working on the case. As a result, Fire-Rescue has taken the approach of inspectors self-assigning only the number of inspections that they believe they can realistically complete that day to prevent locking colleagues from assigned cases. While this approach ensures that priority inspection cases, like expedited requests for real estate defensible space inspections, are not locked so that other staff can complete them in a timely manner, it also contributes to reduced completed inspections.<sup>12</sup>

As noted below, Fire-Rescue began using 3Di to complete proactive brush management inspections in early 2025. According to Fire-Rescue, it is currently developing the software as it moves from using Interra, the previous software, to 3Di to improve the Proactive Brush Management Program. Fire-Rescue noted that inspectors have the capability to place previously assigned cases back into the queue so that staff can self-select for inspection, but staff may be unaware that they have this capability. During the course of the audit, Fire-Rescue stated that it had informed staff that they have the capability to re-assign inspections previously assigned to inspectors. By informing and training staff on this capability, Fire-Rescue could potentially increase the number of inspections it completes daily, and thus, increase its inspection coverage as inspectors would not be limited to only working on the number of cases they self-select.

***Although inspection cases can be accessed remotely, inspectors typically begin their workdays downtown at Civic Center Plaza before spreading out across the City to begin inspections.***

Inspectors go in person downtown to Civic Center Plaza to generate their workload for the day, which results in them beginning their inspections approximately 90 minutes into their shift. Under Fire-Rescue's previous inspection approach where inspectors would inspect the exterior of a property within parcel boundaries, inspectors had to wait until after 8:00 a.m. to knock on residents' doors to ask for access into the property. Therefore, inspectors generally went into the

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<sup>12</sup> Fire-Rescue indicated that it aims to complete expedited real estate defensible space inspections within 72 hours of when the request is made to the department.

office to self-assign cases before heading out into the field to conduct proactive inspections after 8:00 a.m. Although under the new faster inspection approach inspectors no longer go into the property to conduct the proactive inspection, inspectors still begin their workday generally at 6:30 a.m. at Civic Center Plaza to self-assign cases, so that they can start inspections after 8:00 a.m. By assigning cases remotely, rather than spending time driving to and from Civic Center Plaza most days, Fire-Rescue could increase the time spent conducting inspections, and thus, increase inspection coverage.

**Fire-Rescue could benefit from using additional tools in its inspection software to assist with prioritizing which parcels to proactively inspect for brush management.**

Fire-Rescue began using the inspection software, 3Di, in early 2025 to track proactive inspections. As shown in **Exhibit 9**, a dashboard in 3Di displays the parcel number, site address, battalion district, engine district, and whether the parcel is in a Very High Fire Hazard Severity Zone, among other information. Although 3Di has the capacity to track the last date of inspection, Fire-Rescue does not currently track this information. This information could help the department identify parcels that need proactive inspections before re-inspecting parcels that have already been inspected. For example, of the 9,892 proactive inspections documented in 3Di that were conducted from January 2025 through part of October 2026, we found at least 36 parcels that had more than one documented proactive inspection. By tracking the last date of inspection, Fire-Rescue could better prioritize which parcels need to be inspected before it conducts multiple proactive inspections of the same parcel.

Exhibit 9

The Inspection Software, 3Di, Does Not Inform Users of the Last Inspection Date

Parcel Number	Site Address	Is VHFHZ?	Battalion District	Council District	Engine District	Proactive Inspection
<a href="#">3155220106</a>	9408 TWIN TRAILS DR SAN DIEGO CA 92129 US	No	B7		undefined	Yes
<a href="#">4721551600</a>	4320 60TH ST SAN DIEGO CA 92115 US	Yes	B4		undefined	Yes
<a href="#">4721551400</a>	4334 60TH ST SAN DIEGO CA 92115 US	Yes	B4		undefined	Yes
<a href="#">4392000500</a>	5030 ELLISON PL SAN DIEGO CA 92116 US	Yes	B2		undefined	Yes
<a href="#">3155220125</a>	9418 TWIN TRAILS DR SAN DIEGO CA 92129 US	No	B7		undefined	Yes
<a href="#">4664210700</a>	4746 55TH ST SAN DIEGO CA 92115 US	Yes	B4		undefined	Yes
<a href="#">4668900400</a>	4849 54TH ST SAN DIEGO CA 92115 US	Yes	B4		undefined	Yes
<a href="#">3132820100</a>	14446 JANAL WAY SAN DIEGO CA 92129 US	Yes	B7		undefined	Yes
<a href="#">3430506700</a>	0 SAN DIEGO CA US	Yes	B5		undefined	Yes
<a href="#">5391841200</a>	0 HAWTHORN ST SAN DIEGO CA 92104 US	Yes	B2		undefined	Yes

1 2 3 4 5 ... 10 i

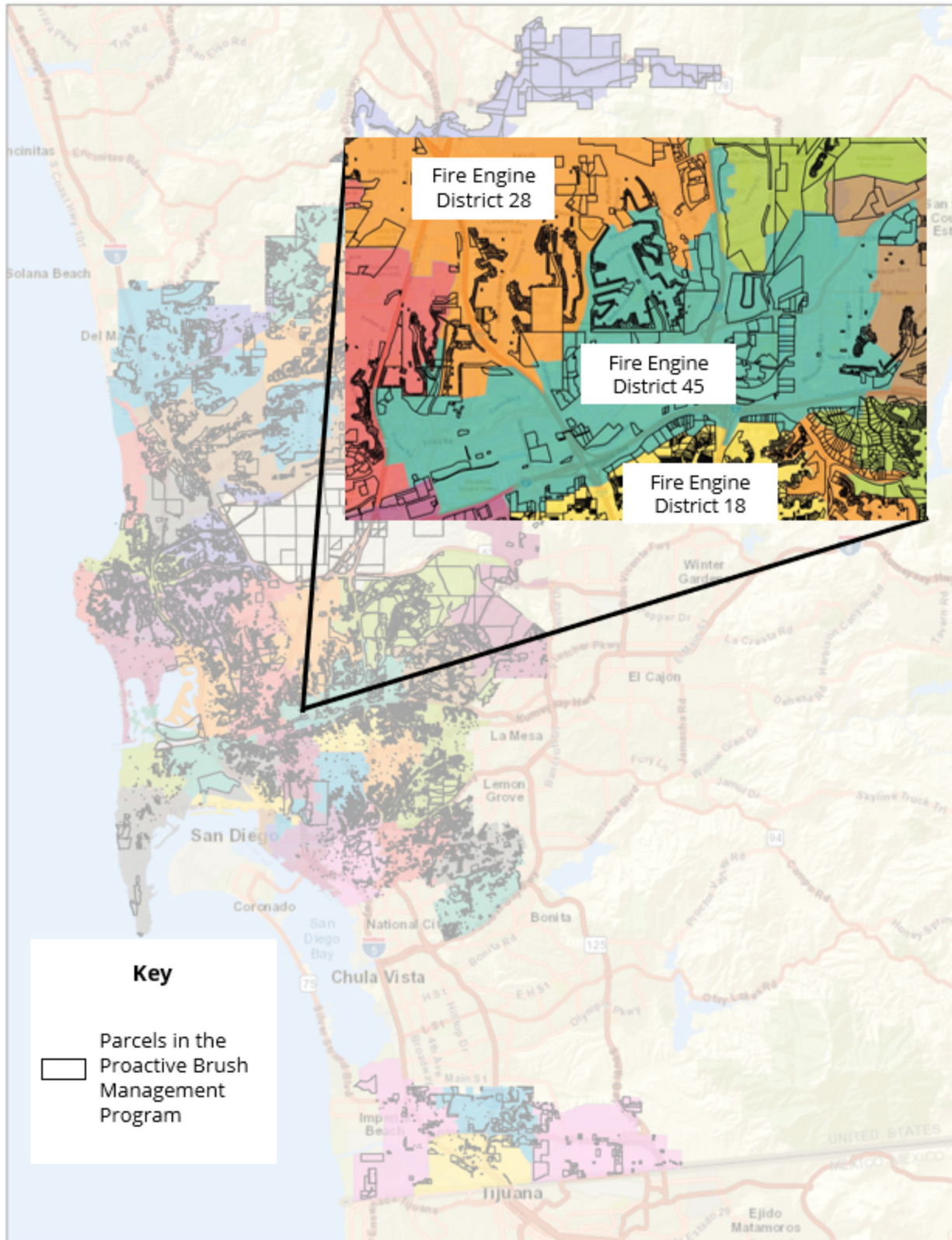
Source: Image obtained from the 3Di dashboard screen.

**Improving how Fire-Rescue creates and groups proactive cases for inspection in its inspection software is important to ensure consistent and more efficient inspection coverage.**

The parcel group tool in 3Di could allow Fire-Rescue to more efficiently group proactive inspections based on the parcels' locations. Currently, to create cases for which parcels to proactively inspect, Fire-Rescue uses fire engine districts, which are geographically-defined areas that capture parcels within their boundaries. Once the cases are created, inspectors look over the list of proactive cases to then self-select parcels to inspect for the day. However, as shown in **Exhibit 10**, fire engine districts generally cover broad areas with many parcels in the Proactive Brush Management Program spread throughout each fire engine district.

Exhibit 10

Parcels in the Proactive Inspection Program are Spread Within Fire Engine Districts, Which Generally Cover Broad Areas

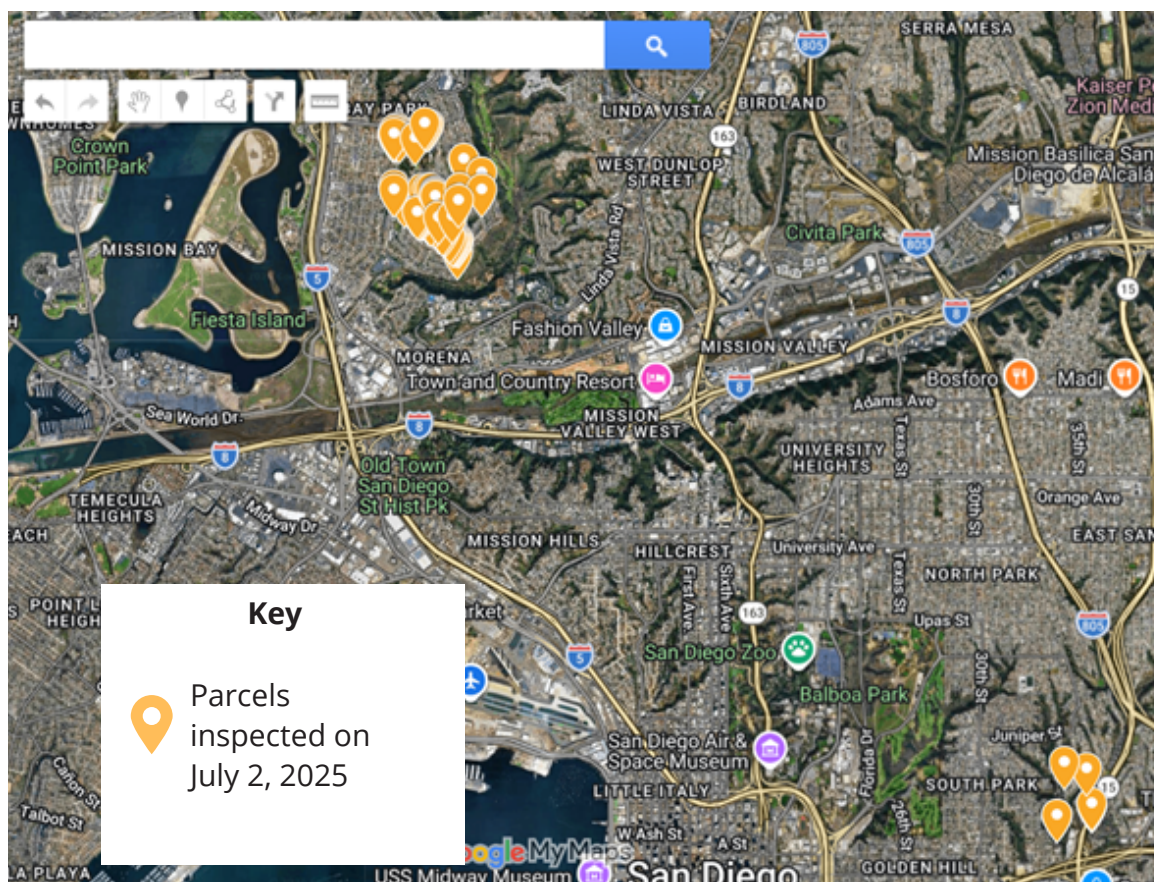


Source: OCA generated based on data in 3Di, SanGIS/SANDAG Regional Data Warehouse, and City GIS data.

Additionally, Fire-Rescue may create cases for proactive inspections for multiple fire engine districts, thus, increasing the geographic area of parcels needing to be proactively inspected. Because inspectors self-select which parcels to proactively inspect, proactive inspections appear to be conducted in a scattered manner. For example, as shown in **Exhibit 11**, we reviewed proactive inspections completed on July 2, 2025 by an inspector and found that inspections appeared to be somewhat scattered and could be more efficiently grouped. This was just one example; similar inspection route patterns appeared for other dates we randomly selected as well.

**Exhibit 11**

**The Current Process for Selecting Which Parcels to Proactively Inspect for Brush Management Issues Includes a Large Geographic Coverage That Contributes to Scattered Inspections**



Source: OCA generated based on proactive inspections completed on July 2, 2025 by one inspector documented in 3Di, Google Maps, and SanGIS/SANDAG Parcel Lookup Tool.

By using the parcel group tool, or a similar mechanism, to group parcels for proactive inspections within close proximity of each other, Fire-Rescue could concentrate on a smaller geographic area to ensure consistent and more efficient inspection coverage.

*The list of parcels in Fire-Rescue's Proactive Brush Management Program is outdated, which contributes to duplicative inspections or some parcels not being inspected.*

Of the 45,101 parcels that Fire-Rescue identified as part of its Proactive Brush Management Program, we identified at least 806 parcels (2 percent) that are also part of Fire Rescue's Annual Weed Abatement Vacant Lot Program.<sup>13</sup> According to Fire-Rescue, because it does not have the resources to conduct weed abatement, it uses a contractor to inspect vacant lots for brush management issues. Thus, eliminating the need for Fire-Rescue inspectors to proactively inspect vacant parcels for brush management issues. However, because these 806 vacant parcels are tracked under the Proactive Brush Management Program, inspections cases for these parcels are generated for staff to then select for inspection, thus, duplicating unnecessary inspections.

For example, we found that of the 26,913 parcels with a documented proactive brush management inspection from August 2020 through April 2025, at least 254 parcels (1 percent) were also inspected by the contractor under the Annual Weed Abatement Vacant Lot Program.<sup>14</sup>

**Exhibit 12** shows an area of the City where parcels were inspected under both brush management inspection programs.

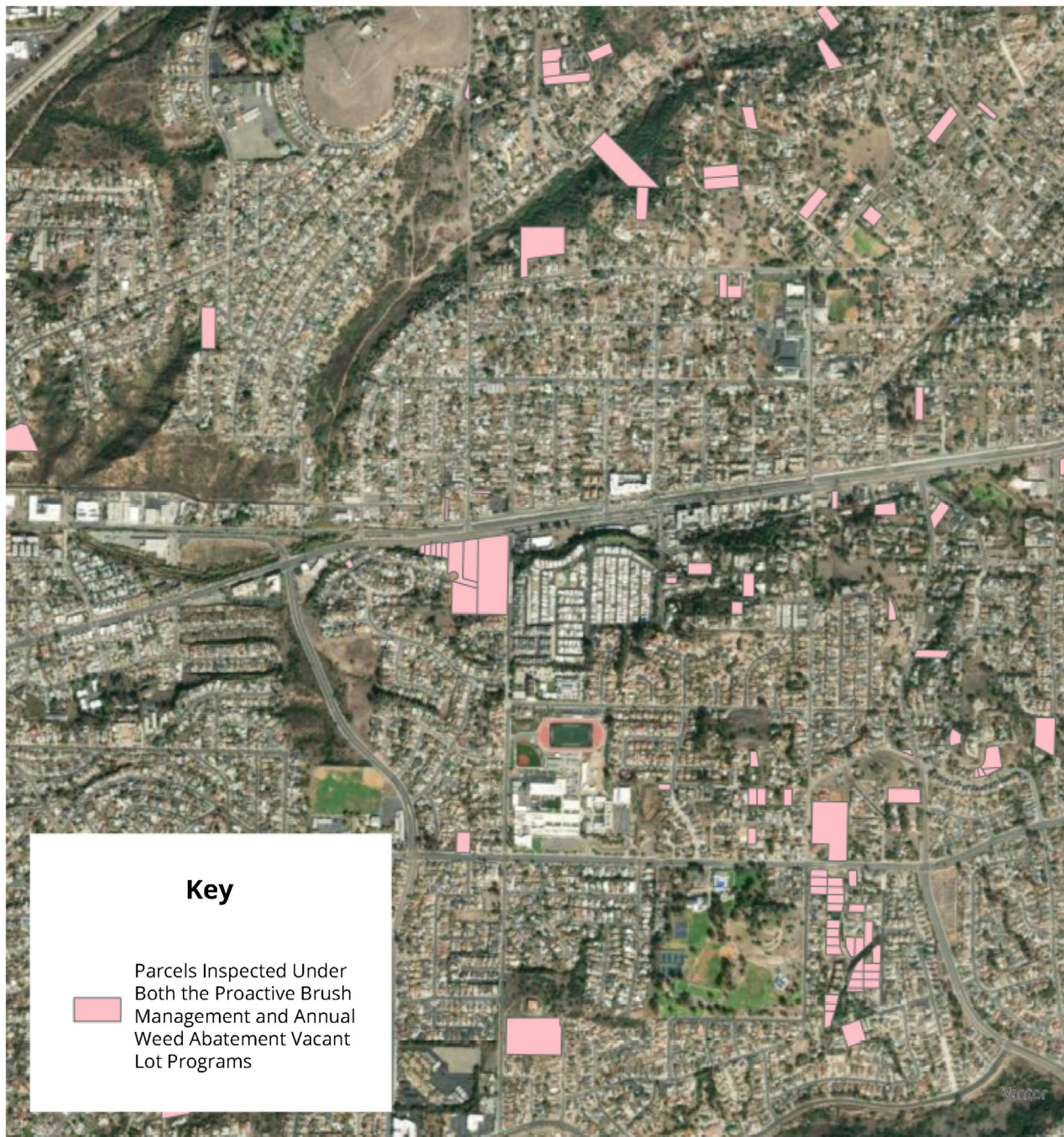
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<sup>13</sup> Our analysis compared the 45,101 parcels in the Proactive Brush Management Program to the parcels inspected under the Annual Weed Abatement Vacant Lot Program from January 1, 2022 through December 31, 2024. Our review excluded lots inspected under the Annual Weed Abatement Vacant Lot Program from January 1, 2020 through December 31, 2021.

<sup>14</sup> Although Fire-Rescue indicated that it also inspects vacant lots that are scheduled for abatement to ensure that the contractor followed abatement procedures, for these 254 instances of duplicative inspections, we found that the documented proactive brush management inspection date fell outside of the dates when the contractor conducted their inspection, thus, indicating that these were separate inspections and not inspections to verify the contractor's work.

*Exhibit 12*

**Some Parcels in the City are Inspected More Frequently Than Others for Brush Management Issues Because the List of Parcels in the Brush Management Program is Outdated and Contains Parcels Also Inspected Under the Annual Weed Abatement Vacant Lot Program**



Source: OCA generated based on data Fire-Rescue provided on inspections of vacant lots, data in 3Di, SanGIS/SANDAG Regional Data Warehouse, and City GIS data.

Additionally, we also found that some parcels that are in a Very High Fire Hazard Severity Zone on a canyon rim are excluded from the Proactive Brush Management Program. For example, as shown in **Exhibit 13**, although some parcels in a Very High Fire Hazard Severity Zone and on a canyon rim are included in the Proactive Brush Management Program, other adjacent parcels are excluded.

*Exhibit 13*

**In Some Areas, Some Parcels are Included in the Proactive Brush Management Program While Other Adjacent Parcels are Excluded from the Program**



Source: OCA generated based on EGIS geospatial analysis from Fire-Rescue’s inspection software 3Di and SanGIS/SANDAG Regional Data Warehouse.

*Changes in the software programs Fire-Rescue used to track inspections resulted in an outdated parcel list.*

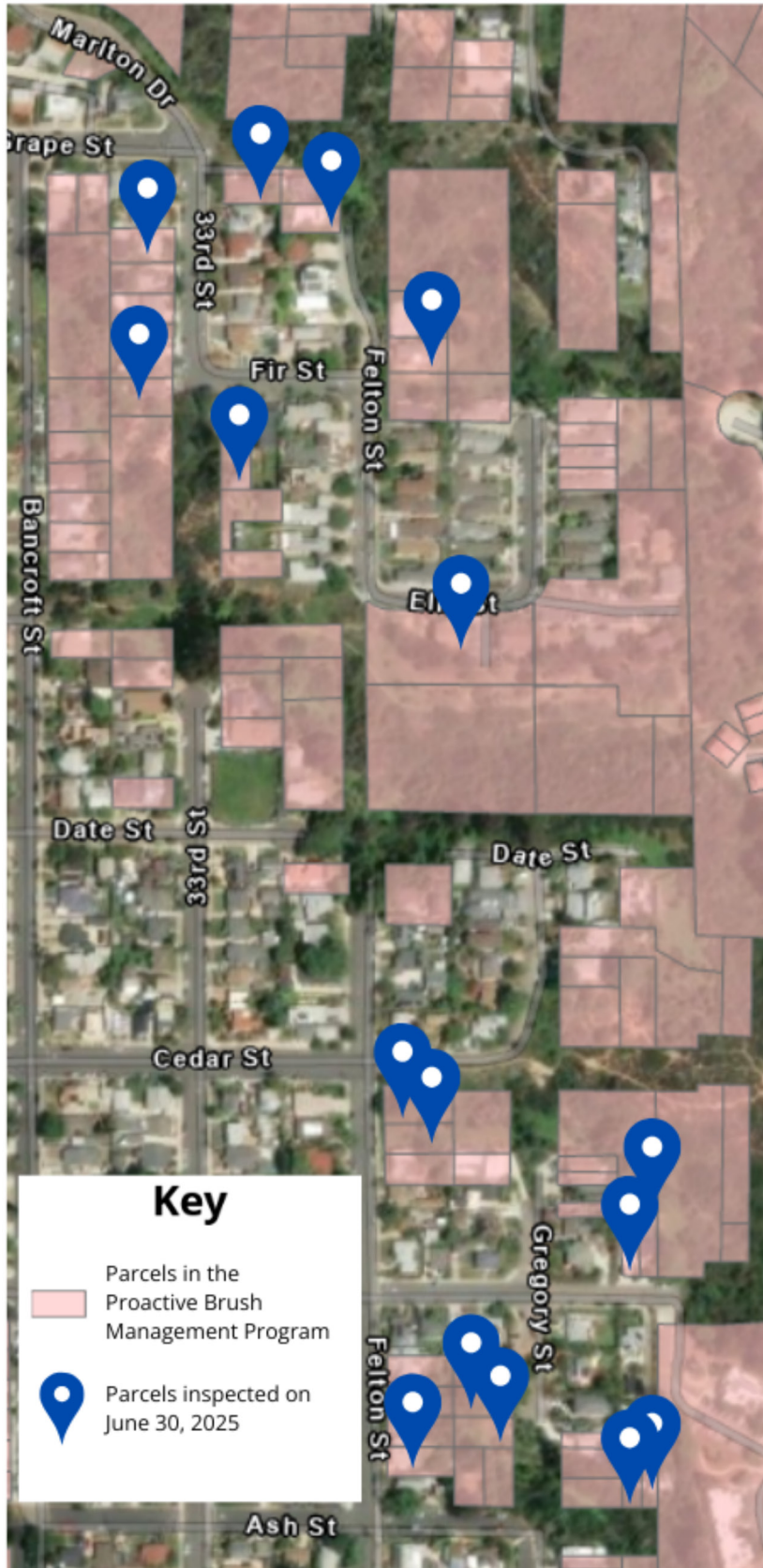
Changes in the software programs Fire-Rescue used to track inspections resulted in an outdated parcel list. When the department developed the Proactive Brush Management Program in 2008, it identified 42,818 parcels to include in the program. Fire-Rescue noted that these parcels and their inspections were tracked in the software system called Collector, and over time, parcels were added and removed from the program as necessary. When the department moved from using Collector to Interra, some of the parcels that had been removed or added from the program in Collector were lost and did not carry over to Interra. Similarly, when Fire-Rescue transitioned from Interra to 3Di, the outdated parcel list carried over to 3Di. Fire-Rescue indicated that now that the City has updated its fire hazard map, it plans to update the list of parcels in its Proactive Brush Management Program. By ensuring that Fire-Rescue can readily track the parcels it plans to inspect under its Proactive Brush Management Program, it can eliminate unnecessary duplicative work while also including parcels that should be included.

### **Inspection routes appear haphazard, and skip parcels.**

Inspection routes are not optimized, which results in inspections being completed in a patchwork-like manner. As noted above, Fire-Rescue has a mechanism to centrally assign cases, but instead it relies on inspectors to self-select the proactive inspections they plan to complete for the day and to route those inspections, with little oversight from management or the supervisor. As a result, inspection routes appear haphazard and in some cases parcels along a route are skipped. For example, we reviewed inspections that occurred on 7 different days, using the new faster inspection approach, and as shown in **Exhibit 14**, found that some parcels in the Proactive Brush Management Program were not inspected on the day that other adjacent parcels were inspected.

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.

**Some parcels may have a lower wildfire risk than others and thus, do not require frequent inspections, yet might be inspected anyway.**

As noted above, we found that over the last 5 years, some parcels were proactively inspected for brush management issues more frequently than others, and some were not inspected at all. According to Fire-Rescue, some parcels and/or geographic areas in the Proactive Brush Management Program may not need to be inspected as frequently as others because the parcel has a lower wildfire risk as the property has been retrofitted or built in accordance with the most recent fire safety standards. Fire-Rescue indicated that as new State laws are enacted for new construction in Very High Fire Hazard Severity Zones, the laws require new construction to meet fire safety standards. As a result, these properties do not need inspections as frequently as other properties that were built under outdated fire safety standards. In fact, when the Proactive Brush Management Program was implemented in 2008, Fire-Rescue developed an inspection schedule based on the severity of hazard each parcel in the program represented.

However, in our review of inspection data, we did not find evidence that documented a parcel's severity of fire hazard relative to the other parcels in the program. By documenting this information or frequency at which specific parcels or areas should be inspected based on wildfire risk, Fire-Rescue could ensure that parcels or areas with a higher wildfire risk are inspected more frequently.

**Although most of the City is in a Very High Fire Hazard Severity Zone, most parcels are not proactively inspected for compliance with brush management, thus, leaving many neighborhoods at risk.**

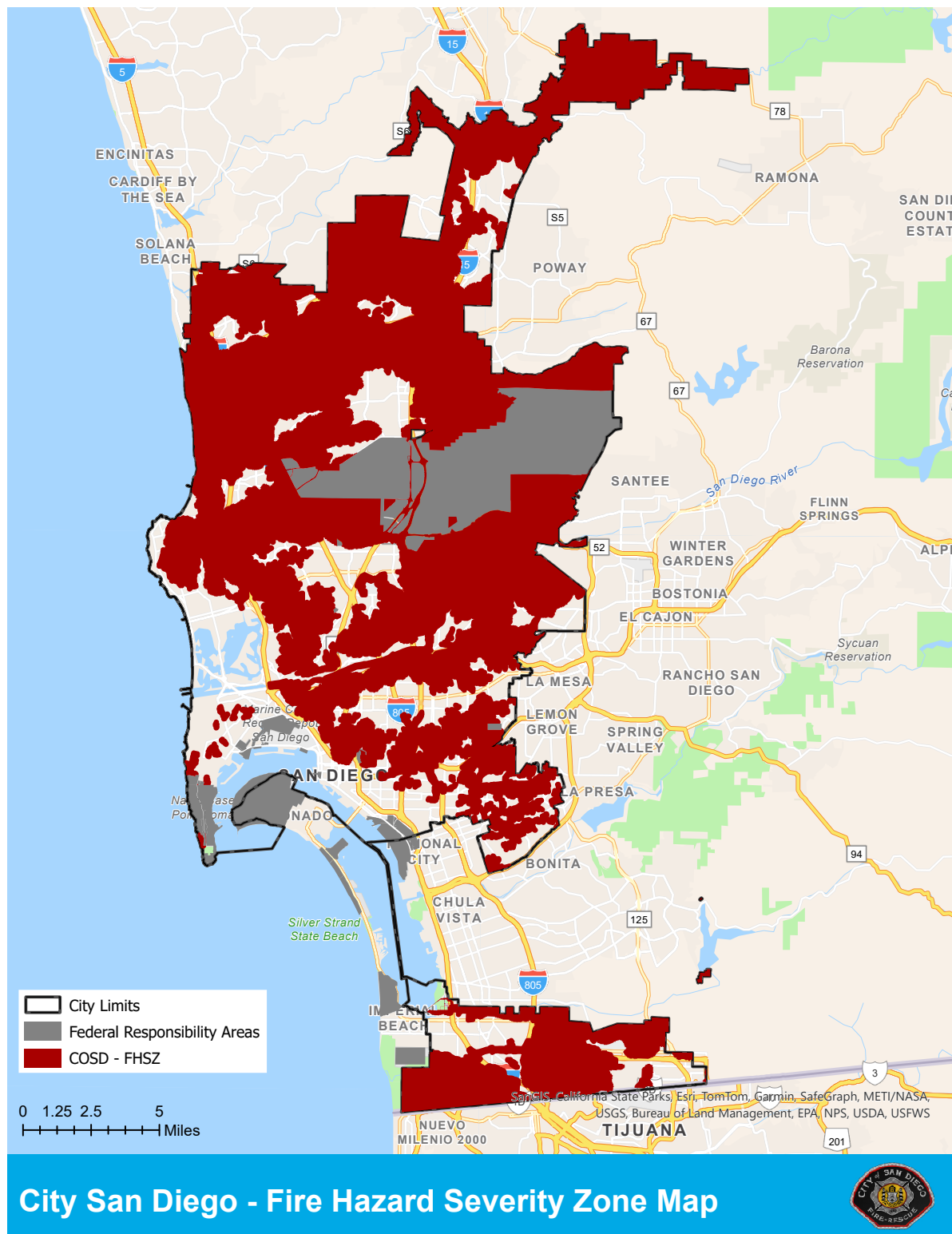
*There are approximately 220,000 parcels in the City in a Very High Fire Hazard Severity Zone, but only 45,101 are prioritized for proactive brush management inspections.*

According to Fire-Rescue, there are approximately 220,000 parcels in the City in a Very High Fire Hazard Severity Zone, but only 45,101 are prioritized for proactive brush management inspections under the Proactive Brush Management Program. The remaining 175,000 parcels are not included in the Proactive Brush Management Program even though they are in a Very High Fire Hazard Severity Zone, and thus, have a high degree of wildfire risk and must always maintain defensible space. According to the California Legislative Analyst's Office, a study from CalFire found that the odds of a structure being destroyed by wildfire were about five times higher for structures that did not comply with defensible space requirements compared to those that did.

Because these 175,000 parcels are not included in the Proactive Brush Management Program, it is highly unlikely for Fire-Rescue to inspect them for brush management issues unless it receives a brush complaint or a request for a real estate defensible space inspection. As shown in **Exhibit 15**, although most of the City falls in a Very High Fire Hazard Severity Zone, many neighborhoods throughout the City are not covered by the Proactive Brush Management Program and are unlikely to ever receive a brush management inspection under the other inspection programs. Therefore, many neighborhoods in the City are left at risk. **Exhibit 16** shows areas in the City that are in a Very High Fire Hazard Severity Zone but that are not included in the Proactive Brush Management Program.

Exhibit 15

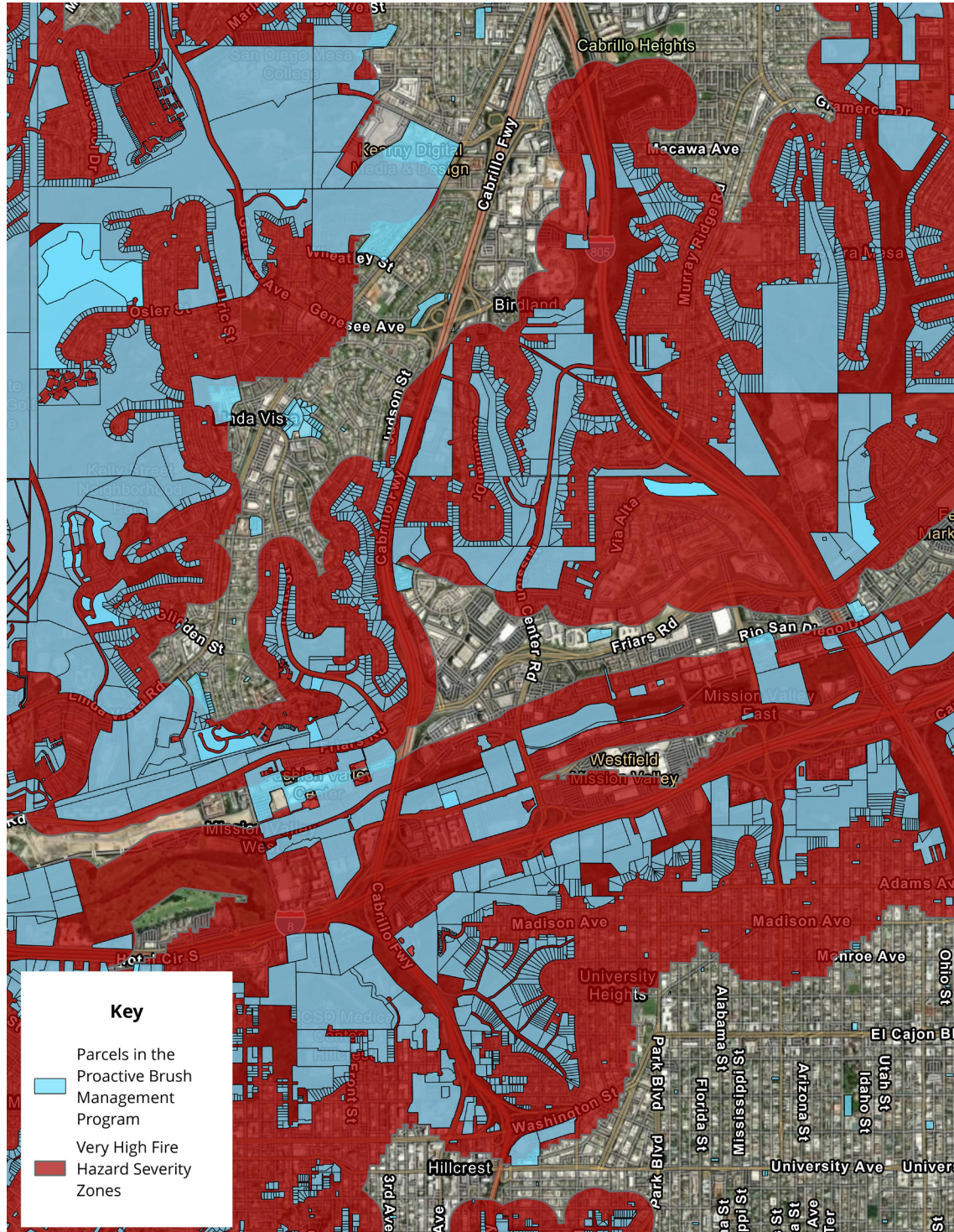
**While the Proactive Brush Management Program Currently Focuses on a Small Subset of Parcels, Most of the City is Classified as a Very High Fire Hazard Severity Zone**



Source: Image obtained from the City of San Diego Fire Hazard Severity Zone Map.

Exhibit 16

Many Areas of the City in a Very High Fire Hazard Severity Zone are Not Included in the Proactive Brush Management Program, and Thus, are Unlikely to Be Inspected for Brush Management Issues, Leaving Them at Risk



Source: OCA generated based on EGIS geospatial analysis of data from Fire-Rescue's inspection software 3Di, SanGIS/SANDAG Regional Data Warehouse, and the City's Very High Fire Hazard Severity Zones.

## Recommendations

To improve effectiveness of the brush management program, we recommend:

### **Recommendation 1.1**

(Priority 1)

The Fire-Rescue Department (Fire-Rescue) should establish and enforce productivity standards, goals, or similar performance targets and procedures based on reasonable expectations for conducting proactive brush management inspections. Finalized performance targets should be communicated to all appropriate employees within the Wildfire Prevention and Mitigation section within Fire-Rescue so that all are aware of these expectations and monitored via routine reporting to management/supervisors.

**Management Response:** Agree. [See full response beginning on page 51.]

**Target Implementation Date:** May 2026

### **Recommendation 1.2**

(Priority 2)

The Fire-Rescue Department (Fire-Rescue) should develop and implement a process to assign or approve brush management inspections in advance for inspectors and which enables inspectors to access their caseloads remotely so that inspections can be completed without physically having to go into the Civic Center Plaza to log into the inspection software. As part of this process, Fire-Rescue should also establish responsibilities for assigning inspections to inspectors.

**Management Response:** Agree. [See full response beginning on page 52.]

**Target Implementation Date:** January 2027

### **Recommendation 1.3**

(Priority 3)

The Fire-Rescue Department should inform and train inspectors on reassigning inspection cases in 3Di.

**Management Response:** Agree [See full response beginning on page 52.]

**Target Implementation Date:** January 2027

**Recommendation 1.4**

(Priority 2)

The Fire-Rescue Department should establish responsibilities to regularly monitor and evaluate the effectiveness of the Proactive Brush Management Program. This monitoring should allow for management to evaluate whether brush management inspectors are keeping up with the productivity targets established in Recommendation 1.1, as well as ensuring that whichever inspection approach it uses is effectively achieving program goals.

**Management Response:** Agree [See full response beginning on page 52.]

**Target Implementation Date:** January 2027

**Recommendation 1.5**

(Priority 1)

The Fire-Rescue Department should develop and implement a process to effectively route proactive inspection cases in the Proactive Brush Management Program. The process could include grouping proactive inspections based on factors such as the parcel's location.

**Management Response:** Agree [See full response beginning on page 53.]

**Target Implementation Date:** July 2027

**Recommendation 1.6**

(Priority 2)

The Fire-Rescue Department should enable or ensure that whichever information management system it uses to populate and assign inspector caseloads shows the date on which a given property was last inspected.

**Management Response:** Agree [See full response beginning on page 53.]

**Target Implementation Date:** July 2027

**Recommendation 1.7**

(Priority 2)

The Fire-Rescue Department (Fire-Rescue) should review and update the list of parcels it plans to inspect under the Proactive Brush Management Program. As part of this update, Fire-Rescue should:

- a. Identify and determine whether it should include other properties in a Very High Fire Hazard Severity Zone for proactive inspections under the Proactive Brush Management Program; and
- b. Establish inspection frequency for the parcels it plans to inspect under the Proactive Brush Management Program.

For parcels in a Very High Fire Hazard Severity Zone excluded from the Proactive Brush Management Program, Fire-Rescue should document its rationale for excluding them from the Proactive Brush Management Program.

**Management Response:** Agree [See full response beginning on page 54.]

**Target Implementation Date:** January 2027

# Finding 2

## *Improving inspection follow-through and enforcement is critical to enhance program effectiveness and further mitigate risk to neighborhoods and properties.*

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### Finding Summary

Although the Fire-Rescue Department (Fire-Rescue) conducts proactive brush management inspections to reduce wildfire risk, we found that inconsistent follow-through and limited enforcement significantly undermine the effectiveness of these efforts. Routine inspections, combined with enforcement actions, such as penalties, are critical to reducing the risk of wildfire damage. However, Fire-Rescue's current practices do not ensure that violations are consistently addressed and do not leverage its penalty framework to incentivize compliance. Specifically, we found:

- **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:** We found that 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. While a front-line supervisor currently provides day-to-day supervision, Fire-Rescue should strengthen its monitoring of program performance to ensure the effectiveness of inspections in mitigating wildfire risk.

To strengthen program effectiveness and reduce wildfire risk, we recommend Fire-Rescue:

- Develop and implement a process to ensure that inspectors consistently conduct follow-up inspections for parcels with documented violations to verify whether violations are addressed;
- Update the Notice of Violation template to include all applicable penalties;
- Begin assessing penalties as appropriate and update its non-compliance fee structure for reasonableness and deterrence; and
- Report progress to City Council after implementing these improvements.

**For proactive brush management inspections, 910 (4 percent) of the inspections had a documented violation at the time of the initial inspection, but only 747 (82 percent) of those were reinspected to verify whether violations were addressed.**

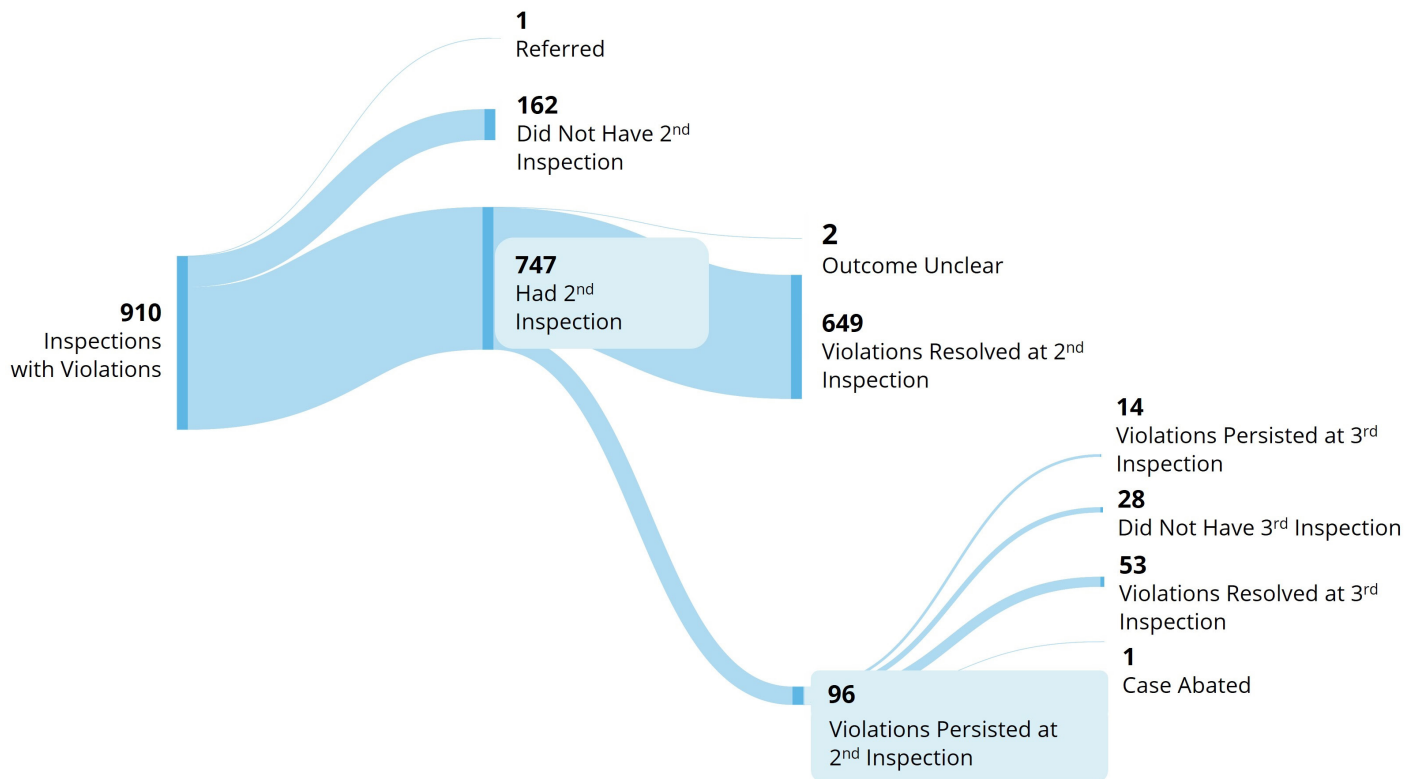
*204 parcels with violations were never reinspected to verify if fire hazards had been addressed.*

Under Fire-Rescue’s previous proactive inspection approach where inspectors conducted a detailed inspection by going into the parcel, we found that 96 percent (20,828) of the inspections conducted from August 2020 through April 2025 passed the inspection while 4 percent (910) of the inspections had at least one documented violation at the time of the initial inspection. Of these 910 parcels, 747 had a documented inspection to verify whether the violation was addressed, and 1 was referred to the Annual Weed Abatement Vacant Lot Program, leaving 162 parcels without a second inspection to confirm whether the violation was corrected. Further, as shown in **Exhibit 17**, for the 747 cases with a documented second inspection, 649 were resolved at the time of the second inspection, while 96 still had outstanding violations.<sup>15</sup> For these 96 cases, only 68 had a third inspection, of which 14 still noted unaddressed violations at the time of the third inspection. Overall, this resulted in 204 parcels with outstanding violations and no documented follow-up inspections to verify whether the violations were ever addressed.

<sup>15</sup> Additionally, there were two cases for which we were unable to determine whether the violations were resolved at the time of the second inspection, as the notes in the inspection software indicated that the inspector left a hanger on the door.

Exhibit 17

**Of the 747 Parcels With a Documented Follow-Up Inspection, 649 Had Resolved the Violations at the Time of the Second Inspection, While 96 Failed the Second Inspection, and Only 68 of Those Had a Third Inspection**



Source: OCA generated based on inspection data from the Interra inspection software.

*Only 46% of complaint inspections with a violation had a documented follow-up inspection.*

Despite Fire-Rescue’s guidance that all brush management violations should be re-inspected, we also found that Fire-Rescue did not consistently conduct follow-up inspections for complaint inspections to verify whether the property owner and/or resident addressed the violations. We found that of the 1,409 brush management complaint inspections conducted from August 2020 through February 2025, 295 (21 percent) had a documented violation at the time of the initial inspection, but only 135 (46 percent) of these 295 inspection records had a documented follow-up inspection to verify whether violations were addressed.<sup>16</sup>

<sup>16</sup> The 1,409 inspections exclude 73 complaint inspections because either they pertained to a City-owned parcel or vacant lot parcel. Specifically, 59 inspections, of which 53 had a violation at the time of the initial inspection, pertained to a City-owned parcel and the case was referred to the appropriate department for resolution. The remaining 14 complaint inspections pertained to vacant lots and the cases were referred to Fire-Rescue’s contractor for follow-up.

Furthermore, of the 135 cases that had a documented follow-up inspection to verify whether violations were addressed, 8 of the cases had inspection notes at the time of the second inspection that indicated that violations were still present. For these 8 cases, we did not find evidence of a third inspection to verify whether violations were addressed. For example, we reviewed a case in which the complaint pertained to uncontrolled bamboo on the south side of the home. The inspector completed the initial inspection in May 2024, noted the violation, and conducted a follow-up inspection in June 2024. At the time of the follow-up inspection, the inspection notes indicated that, the “violation persists [and] no work [had] started.” As shown in **Exhibit 18** below, according to an image from Google Maps dated February 2025, nearly eight months after the follow-up inspection, the issue remained unaddressed. According to the data and as of September 2025, inspectors had not conducted a follow-up inspection to verify whether the issue was resolved.

### *Exhibit 18*

#### **A Brush Management Violation for the Overgrown Brush Remained Unaddressed at the Time of the Second Inspection, and Nearly Eight Months After the Reinspection, Yet Fire-Rescue Did Not Conduct a Third Inspection to Verify Whether the Violation Was Ever Addressed**



Source: Image obtained from Google Maps.

According to Fire-Rescue, when the department transitioned from using Interra to 3Di, inspection history stored in Interra did not carry over to 3Di. As a result, inspectors lost the ability to track outstanding inspections under the new inspection software. This, along with an absence of system alerts or frequent monitoring to ensure that parcels with outstanding violations are reinspected, has likely contributed to

parcels with documented violations being left without reinspection to verify whether violations are resolved. Therefore, Fire-Rescue should develop and implement a process, which may include system alerts or reminders for example, to ensure that inspectors consistently conduct follow-up inspections for parcels with documented violations to verify whether violations are addressed, as well as for supervisors and management to monitor the status of follow-up efforts.

### **Fire-Rescue does not assess non-compliance penalties or force abatement, even when brush management violations persist after multiple inspections.**

Fire-Rescue's penalty framework allows the department to assess non-compliance fees and force abatement when violations remain after multiple inspections. For example, the framework allows the department to assess a \$300 non-compliance penalty and force abatement after the third inspection when violations remain unaddressed. However, from August 2020 through September 2025, the department did not assess any non-compliance penalties nor forced abatement.

### **The inspection manual does not contain information to guide inspectors when non-compliance penalties for proactive brush management inspections should be assessed.**

Fire-Rescue's inspection manual includes information on the workflow for annual, high-rise, hazardous materials, complaint, and real estate defensible space inspections, among others, but omits proactive brush management inspections. The manual provides guidance on how inspections and reinspections should proceed and when non-compliance fees should be assessed for these inspections. Specifically, after the third failed inspection, the manual outlines options such as whether to issue non-compliance fees or to forward the case to a supervisor.

*For brush management complaint inspections, the manual only provides guidance for assessing non-compliance inspections fees after the third failed inspection.*

Moreover, we found that for brush management complaint inspections, the manual only provides guidance for assessing non-compliance inspections fees after the third failed inspection, even though the department may assess a non-compliance fee after the second failed inspection. By including workflow information for proactive brush management inspections, and updating the workflow for complaint inspections, Fire-Rescue could ensure that it has clear guidance on when non-compliance fees for proactive and complaint brush management inspections should be assessed.

## **Fire-Rescue is reluctant to force homeowners to comply with brush management regulations and instead emphasizes educating the public on brush management.**

According to Fire-Rescue, non-compliance inspection fees are not meant to be cost-recoverable, but rather are meant to be used as a tool to incentivize homeowners to bring the property into compliance with brush management regulations.

Notably, Fire-Rescue conducts many outreach and community education activities to educate the community on requirements and convey the importance of brush management. According to Fire-Rescue, in FY2024 and FY2025, it participated in 24 wildfire preparedness community events, and as of December 2025, had participated in 13 for FY2026. These events were put on by fire safe councils, community groups, and others to help educate the public on wildfire preparedness, including brush management.<sup>17</sup>

In contrast, inspectors for the City's Development Services Code Enforcement Division, which carry out similar inspections as brush management inspectors, but for building, housing, and zoning regulations, also try to take an approach that emphasizes education rather than penalize property owners and/or residents, but nevertheless do occasionally issue fines when property owners do not sufficiently mitigate identified issues.<sup>18</sup>

## **The template for the Notice of Violation does not inform parcel owners of the new \$50 non-compliance fee, which limits the incentive to bring the property into compliance.**

Although in March 2025, Fire-Rescue proposed, and City Council approved, a new \$50 penalty for when violations remain unaddressed after the second inspection, we found that the Notice of Violation template does not inform parcel owners of this penalty. When inspectors identify a violation(s) at the time of the initial inspection, Fire-Rescue sends a Notice of Violation to the parcel owner. As shown in **Exhibit 19**, the Notice of Violation informs the parcel owner of the inspection date, what the violation is, how to correct the violation,

<sup>17</sup> Fire safe councils are grassroots, community-led organizations that educate homeowners about community wildfire preparedness activities while working with local fire officials to design and implement projects that increase the wildfire survivability of their communities.

<sup>18</sup> A 2022 audit from the Office of the City Auditor, for example, found that the Development Services Department issued invoices for over 300 cases from February 2018 through January 2022. The invoices totaled about \$1 million, with the average invoice of about \$3,400. Available at: [https://www.sandiego.gov/sites/default/files/22-009\\_dsd\\_code\\_enforcement.pdf](https://www.sandiego.gov/sites/default/files/22-009_dsd_code_enforcement.pdf)

and of a \$300 non-compliance fee that may be assessed at the third and subsequent inspection if all violations are not corrected, but the notice does not mention the \$50 penalty for violations that remain unaddressed after the second inspection.

### Exhibit 19

## The Template for the Notice of Violation Does Not Inform Parcel Owners of Initial Penalties for Violations That Remain Unaddressed After the Second Inspection

Re: Initial Inspection - Annual Defensible Space Inspection on August 01, 2025

**Notice of Fire and Safety Hazards.** The initial fire inspection has been completed. You are hereby notified that an inspection of your premises has disclosed Fire and/or Building Code violations that require correction. Violations and required corrections are detailed on the next page.

**Order to Comply.** As such conditions are contrary to law you are hereby required to correct these conditions immediately upon receipt of this notice. An inspection to determine whether you have complied will be conducted on or after the next inspection date (listed on the next page). Failure to comply with the foregoing order before the date of the next inspection may subject you to further enforcement action and penalties as provided by law.

**Permit and Inspection Fees.** Inspection and permit fees will not be collected by fire inspection personnel. You will receive by mail an invoice from the City Treasurer for the inspection costs and permit fees as applicable.

**Non-compliance fee.** A \$300 per occurrence, in addition to the inspection fee, may be assessed at the third and subsequent inspection if all violations are not corrected. Failure to correct all violations in a timely manner may result in a referral to the City Attorney for civil and/or criminal prosecution.

**Potential Enforcement Consequences for Failure to Timely Comply with this Notice.** Misdemeanor criminal prosecution (maximum fine of \$1,000 per day for each violation plus six months in jail), civil injunction, administrative abatement, revocation of permits, recordation of Notice of Violation, civil penalties (maximum of \$2,500 per day for each violation).

#### Inspection Notes

In order to be in compliance, cut and remove all weeds and dead vegetation within entire parcel.

Initial Inspection 08/01/2025 10:35 AM

Source: Image obtained from a Notice of Violation in 3Di.

## Weak enforcement may reduce compliance and fail to deter repeat violations, increasing the City's vulnerability to wildfire.

Community education events are important and commendable. However, when Fire-Rescue does not follow-up on inspections to verify whether violations are addressed, does not inform homeowners of non-compliance fees, or never assesses fees, it lessens the incentives for homeowners to bring their property into compliance. As noted in **Finding 1**, given that approximately 220,000 parcels in the City are located in a Very High Fire Hazard Severity Zone, unaddressed brush management issues increase the City's vulnerability to wildfire.

According to a report from the California Legislative Analyst's Office on promoting defensible space, in the absence of strong social pressures or financial incentives—such as enforcement of fines for noncompliance—homeowners might not consistently prioritize taking action to maintain defensible space.

According to the City's Department of Finance, penalties and fines are intended to act as a deterrent rather than a revenue generator. The Department of Finance also noted that the penalty amounts could vary and are based on department recommendations.

### **Other municipalities have fee and penalty frameworks for non-compliance that are much more stringent and higher than the City of San Diego's.**

Benchmarked municipalities have more stringent and higher brush management non-compliance penalties. Fire-Rescue's penalty framework allows the department to assess a \$50 penalty after the second inspection and a \$300 penalty after the third inspection. Additionally, when violations remain outstanding after the third inspection, Fire-Rescue can force abatement on the property, with associated abatement fees being placed as a lien on the property.

*Other municipalities assess fees as soon as at the time of the initial inspection.*

As shown in **Exhibit 20**, we found that 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. The County of Los Angeles' \$151 fee for example, is assessed on every inspected property, regardless of whether the property passes or fails. The City of Los Angeles notes that all invoices that are not paid will be forwarded to the Tax Assessor of the County of Los Angeles and will be added to property taxes as a special assessment.

**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

\* In 2020, Berkeley voters approved Measure FF, a parcel tax, to fund various fire services, including funding for an average of 8,000 defensible space inspections annually.

\*\* Fees for the City of Beverly Hills are effective January 1, 2026.

\*\*\* The County of Los Angeles Fire Department also covers brush management inspection for cities including: Palmdale, Santa Clarita, and others.

\*\*\*\* If the parcel is inspected or cleared by the Agricultural Commissioner, there is an inspection fee of \$51.59 and the clearing costs are placed on the parcel's annual tax bill.

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

Moreover, we also found that the \$300 non-compliance fee has been in place since at least 2010 and, as noted above, remains well below the amount that other jurisdictions assess. A 2025 Staff Report from Fire-Rescue notes that user fees are updated annually as part of the budget process, and adjustments are based on the annual CPI inflation rate, if applicable. Additionally, the City's Council Policy on user fees notes that fines and penalties shall be reviewed annually relative to the reasonableness of the fee and the fiscal effect as it relates to deterrence. However, most recently, for FY2026, as part of the City's comprehensive user fee study, Fire-Rescue updated its fees for other services the department conducts; however, the \$300 non-compliance penalty remained unchanged.<sup>19</sup> Had Fire-Rescue revised the \$300 to keep up with inflation, we estimate that the \$300 non-compliance fee

<sup>19</sup> Fire-Rescue's \$300 non-compliance fee is identified as Category III, which represents fees for penalties and fines. According to Council Policy 100-05, City departments with user fees shall determine cost recovery rates based on direct and indirect costs for all fees in order to accurately calculate the cost of providing services regardless of whether all services are deemed to be fully cost recoverable.

in February 2025—when the comprehensive user fee analysis was presented to the Budget & Government Efficiency Committee—would have been \$438.

Although we found that Fire-Rescue benchmarked its user fees with other municipalities like the City of Los Angeles, the City of San Jose, and Orange County, for other services it provides, as shown in **Exhibit 21**, according to Fire-Rescue, it did not benchmark brush management non-compliance penalties.<sup>20</sup> However, according to the City’s User Fee Policy and the Department of Finance, benchmarking must be considered during a comprehensive user fee study or a department-initiated change. Because the \$300 non-compliance penalty has been in place since at least 2010, a benchmarking study could help determine whether current fees remain reasonable and align with comparable municipalities.

**Exhibit 21**

**Fire-Rescue Benchmarked Its User Fees for Other Services It Provides**



**FY 2026 Proposed User Fees - Benchmarking**  
*Various Programs (cont'd)*

Fire-Rescue Department										
Program	Fee Title	Fiscal Year of Last Revision	Current Fee Amount	Proposed Fee Amount	City 1 Name	City 1 Current Fee Amount	City 2 Name	City 2 Current Fee Amount	City 3 Name	City 3 Current Fee Amount
Non-Compliance	Penalty -Third	NEW	NEW	\$300	Orange County	\$250				
	Penalty - Fourth	NEW	NEW	\$600	Orange County	\$500				
	Penalty - Fifth	NEW	NEW	\$1,200	Orange County	\$1,000				
	Overcrowded Business Penalty	NEW	NEW	\$1,000	Chula Vista	\$1,000				
Permit Services	HazMat-Inspections	2023	\$282	\$337	Los Angeles	\$361	San Jose	\$321	Orange County	\$230
	HazMat -Operational Permits	2023	\$141	\$168	Los Angeles	\$181	San Jose	\$183		

Note: The non-compliance inspection fees listed above pertain to inspections for high-rise buildings (e.g., building construction and fire protection requirements), residential facilities (e.g., inspections for properties with two or more dwellings to ensure fire protection services are maintained and operable, and the absence of electrical hazards, among others), day-care facilities, and nursing homes, among others.

Source: Presentation from the Department of Finance to the Budget and Government Efficiency Committee on February 5, 2025.

<sup>20</sup> As part of the comprehensive user fee study, departments were asked to benchmark against three to five cities comparable to the City and if unable to do so, departments needed to provide a reason why benchmarking could not be conducted.

## **Fire-Rescue should strengthen its monitoring of program performance to ensure the effectiveness of inspections in mitigating wildfire risk.**

Reporting out on program performance is an important mechanism for providing clarity and transparency on overall program effectiveness. As noted in **Finding 1**, Fire-Rescue eliminated its Key Performance Indicator pertaining to the percentage of privately-owned parcels it inspects annually for brush management compliance, thus missing an opportunity to keep stakeholders informed about how the program is doing. Additionally, while department presentations to the public and the City about user fees provide some insight into projected fees and penalties, this information does not show other important information about the program, such as the number of parcels inspected or re-inspection consistency, nor that Fire-Rescue has not assessed or collected reinspection fees despite having conducted reinspections to verify whether violations were resolved. While a field supervisor currently provides day-to-day supervision, officials such as the Assistant Fire Marshalls and Fire Marshals have an important role to play in monitoring program performance and effectiveness, addressing the issues outlined in this report, and periodically informing the public and City Council about progress on those efforts as well as their own initiatives.

## Recommendations

To ensure effectiveness of the brush management program, we recommend:

### **Recommendation 2.1**

(Priority 1)

The Fire-Rescue Department should complete follow-up inspections for the 204 proactive inspection cases we identified with outstanding violations after the last inspection to verify whether the property owner and/or resident addressed the documented violations noted at the time of the initial inspection.

**Management Response:** Agree [See full response beginning on page 54.]

**Target Implementation Date:** January 2027

### **Recommendation 2.2**

(Priority 1)

The Fire-Rescue Department should develop and implement a process, which could include system alerts or reminders, to ensure that inspectors consistently conduct follow-up inspections for parcels with documented violations to verify whether violations are addressed.

**Management Response:** Agree [See full response beginning on page 55.]

**Target Implementation Date:** January 2027

### **Recommendation 2.3**

(Priority 1)

The Fire-Rescue Department should update its inspection manual to include workflow information for proactive brush management inspections and update the workflow for complaint inspections to provide guidance on when non-compliance fees or penalties should be assessed.

**Management Response:** Agree [See full response beginning on page 55.]

**Target Implementation Date:** January 2027

**Recommendation 2.4**

(Priority 1)

The Fire-Rescue Department should pursue enforcement and issue fees and penalties as appropriate (e.g., for properties that do not pass inspections), in alignment with its inspection workflow in Recommendation 2.3, to better ensure program effectiveness and risk mitigation.

**Management Response:** Agree [See full response beginning on page 56.]

**Target Implementation Date:** July 2027

**Recommendation 2.5**

(Priority 2)

The Fire-Rescue Department should update its non-compliance fee structure for brush management inspections to ensure that the fees are current and align with those charged by comparable jurisdictions, such as the examples provided by, but not limited to, the cities of Berkeley, Beverly Hills, Burbank, Los Angeles, Oakland, and the County of Los Angeles.

**Management Response:** Agree [See full response beginning on page 56.]

**Target Implementation Date:** July 2028

**Recommendation 2.6**

(Priority 2)

After the Fire-Rescue Department implements Recommendation 2.5, Fire-Rescue should update the Notice of Violation template to include all applicable fees or penalties.

**Management Response:** Agree [See full response beginning on page 57.]

**Target Implementation Date:** April 2026

**Recommendation 2.7**

(Priority 3)

The Fire-Rescue Department should present a publicly-available report to the appropriate City Council bodies, such as the Public Safety Committee, on the status of brush management inspections, and should seek guidance from Council regarding the desired frequency of such a report. The update should specifically address inspections conducted under the Proactive Brush Management Program and Weed Abatement and Brush Complaint Program, and should include:

- a. The number of parcels inspected for each program;
- b. The number of parcels with identified brush management violations by inspection type (e.g., initial inspection, first reinspection, etc.) and the extent to which reinspections were conducted for each inspection type;
- c. Number and total amount of reinspection fees or penalties assessed, and collected, including abatements by inspection type; and
- d. Alternative options to promote consistency of actual fee collection.

**Management Response:** Agree [See full response beginning on page 57.]

**Target Implementation Date:** July 2028

# Appendix A

## *Definition of Audit Recommendation Priorities*

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The Office of the City Auditor maintains a priority classification scheme for audit recommendations based on the importance of each recommendation to the City, as described in the table below.

While the City Auditor is responsible for providing a priority classification for recommendations, it is the City Administration’s responsibility to establish a target date to implement each recommendation, taking into consideration its priority. The City Auditor requests that target dates be included in the Administration’s official response to the audit findings and recommendations.

PRIORITY CLASS*	DESCRIPTION
1	Fraud or serious violations are being committed. Significant fiscal and/or equivalent non-fiscal losses are occurring. Costly and/or detrimental operational inefficiencies are taking place. A significant internal control weakness has been identified.
2	The potential for incurring significant fiscal and/or equivalent nonfiscal losses exists. The potential for costly and/or detrimental operational inefficiencies exists. The potential for strengthening or improving internal controls exists.
3	Operation or administrative process will be improved.

\* The City Auditor is responsible for assigning audit recommendation priority class numbers. A recommendation that clearly fits the description for more than one priority class shall be assigned the higher priority.

# Appendix B

## *Audit Objectives, Scope, and Methodology*

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### Objective

In accordance with the Office of the City Auditor's (OCA) Fiscal Year (FY) 2025 Audit Work Plan, we conducted a performance audit of the City's brush management on private property. The objective of this audit was to:

1. 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.

### Scope

The scope of this audit was brush management on private property from August 2020 through September 2025. The scope did not include brush management on public properties.

### Methodology

**To determine whether Fire-Rescue's brush management inspection efforts efficiently and effectively ensure private properties comply with brush management requirements, we:-**

- Reviewed State law and San Diego Municipal Code pertaining to defensible space, brush management, and fire hazard severity zones.
- Analyzed proactive brush management, complaint, and real estate defensible space inspection data from the Interra and 3Di inspection software systems.
- Conducted site visits pertaining to proactive brush management, complaint, and real estate defensible space inspections.
- Interviewed Fire-Rescue management and staff.
- Mapped the list of parcels in the Proactive Brush Management Program.
- Reviewed a sample of seven workdays on the number of completed proactive and real estate defensible space inspections and mapped these inspections.

- Reviewed Fire-Rescue's presentations to the Budget and Government Efficiency Committee and City Council on its proposed FY2026 user fees.
- Reviewed City After-Action Reports.
- Reviewed literature from CalFire and the California Legislative Analyst's Office on brush management.
- Reviewed Fire-Rescue's 3Di Staff User Manual.
- Benchmarked Fire-Rescue's brush management practices on private property with:
  - City of Berkeley
  - City of Beverly Hills
  - City of Burbank
  - City of Los Angeles
  - City of Oakland
  - County of Los Angeles

## Data Reliability

We primarily worked with several data sets: inspection data in Interra and 3Di, and the City of San Diego Fire Hazard Zone map layer, City of San Diego Fire Stations, and the County of San Diego parcels map layers. We interviewed Fire-Rescue, to discuss controls to ensure that the data in Interra and 3Di was reliable.

Additionally, we reviewed 15 proactive brush management inspections (tracked in 3Di) to determine the inspection record in 3Di noted that violations were documented at the time of the initial inspection. We also judgmentally reviewed 119 proactive inspection cases to determine whether the inspection notes in 3Di indicated that violations were documented at the time of the initial inspection in instances where the inspection status indicated that the parcel was in-compliance.

Because Fire-Rescue has not conducted analyses on the number of parcels inspected, rate of brush management violations, and reinspections throughout the project, we provided several drafts of the report as it was developed and met with the auditee multiple times to ensure all figures were as accurate and reliable as possible; we present figures as estimates, and note limitations, caveats, and notes under relevant exhibits accordingly. Despite these data limitations, we determined that the data was sufficiently reliable for the purposes of responding to our objective and supporting our findings and recommendations.

## Internal Controls Statement

We limited our review of internal controls to specific controls relevant to our audit objectives, described above.

## Compliance Statement

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.



## THE CITY OF SAN DIEGO

## M E M O R A N D U M

DATE: April 28, 2026

TO: Andy Hanau, City Auditor, Office of the City Auditor

FROM: Robert Logan, Chief, Fire-Rescue Department

SUBJECT: Management Response to the Office of the City Auditor's Performance Audit of Brush Management on Private Property

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This memorandum serves as the management response to the Performance Audit of Brush Management on Private Property (Performance Audit). At the time this response was written, the draft Performance Audit provided to management contained two findings and fourteen recommendations. Department staff and management appreciate the Performance Audit prepared by the Office of the City Auditor and thank the staff involved.

Management agrees with the recommendations within the Performance Audit and this management response highlights those recommendations that will need additional resources to implement.

The San Diego Fire-Rescue Department's Community Risk Reduction Division has made a significant effort to develop strategic planning initiatives to improve its programs and services since October of 2021. This effort began with reestablishing a 5-year San Diego Fire-Rescue Strategic Plan from 2004. That strategic plan was titled "First-In-Last-Out" which incorporated a 3-year Fire Prevention Bureau strategic plan that was created in 2005.

The Fire Prevention Bureau's 3-year strategic plan goals were aimed at improving staffing, employee training, resources, technology, internal communication, accountability, and recognition. The foundation of these strategic plans was established by the [San Diego Regional Fire Prevention and Emergency Preparedness Task Force](#) following the historic Cedar, Paradise and Otay fires of 2003.

The Department also took into account recommendations from the [2010 Performance Audit of the Fire Prevention Activities Within the City of San Diego](#) and the [2023 Performance Audit of the City's Brush Management on City-Owned Land](#). Due to unmet strategic plan goals such as staffing and unmet audit recommendations, the Department anticipated similar issues may be identified in the 2025 Audit of Brush Management on Private Property. The Department

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continues its efforts to seek staffing and improve the Wildland Management and Enforcement section by providing new training and technical knowledge for staff.

To improve training and technical knowledge, the Department has been working with Personnel, Labor Relations and recognized employee organizations (REOs) to create new classifications and working titles to adapt to current standards. The new classifications and working titles are focused on meeting those unmet goals and audit recommendations by establishing updated duties, enhancing productivity standards, goals and performance targets.

A Side Letter agreement was routed to the May 19, 2026, City Council meeting for approval. The agreement applies to (non-sworn) Code Compliance Officers with the working title of Defensible Space Inspector responsible for conducting proactive inspections on privately owned property. The agreement includes Special Assignment Pay for updated duties that will be incorporated into Employee Performance Plans. The agreement also includes Voluntary Certification Pay when staff obtain and maintain the [NEPA Certified Wildfire Mitigation Specialist](#) (CWMS) certification. This certification provides technical knowledge to support updated duties, performance standards and improved quality of inspections. To demonstrate professional development activities, there is a recertification requirement every three years.

While these recent efforts may improve staff's productivity standards and quality of work, it does not address the unmitigated risks associated with increasing the number of annual inspections being completed. To have an effective proactive inspection program, it will require additional staffing to increase the quantity of inspections while not sacrificing the quality of inspections being completed each year. In 2025, an NFPA 1730 staffing analysis was completed. It assessed the minimum full-time staff needed that are dedicated to meeting the Proactive Inspection Program goals. The result of the analysis was a need for the addition of (1) Defensible Space Supervisor and (5) Defensible Space Inspectors to successfully complete all 46,000 inspections every two years.

While staffing levels have remained the same since 2010, the number of parcels in the Proactive Inspection Program has steadily increased. With workload volumes increasing, it creates a cumulative effect or compounding of workloads. In the 2010 audit, there were 42,818 parcels identified in the program. In 2026, there are over 46,000 due to increased housing density according to the Department's records. On March 24, 2025, the State released the updated Fire Hazard Severity Zone (FHSZ) map for Local Responsibility Areas (LRAs). With this recent release, the number of parcels in the Very High Fire Hazard Severity Zone is now estimated to be at 220,000. This indicates that there are approximately 180,000 parcels that are not part of the Proactive Program subject to defensible space requirements.

Current staff who oversee the Proactive Inspection Program are also responsible for four other programs. Two of these are the Weed Abatement and Brush Complaint Program, and the Annual Weed and Vacant Lot Programs. In 2021, Assembly Bill 38 (now [California Civil Code 1102.19\(a\)](#)) established the Real Estate Defensible Space Inspection Program. In 2020, [Assembly Bill 3074](#) established the new ember resistant zone called Zone 0. This requirement became effective for new structures on February 28, 2026, and applies to existing structures in a VHFHSZ on February 28, 2027. These new requirements increase staff workload and create new programs to provide these services to our community.

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After the Easton and Palisades Fires, there has also been a significant increase in questions and requests for wildfire preparedness presentations from the community groups and council staff. The same staff who oversee the Proactive Program assist with these presentations. To meet the needs of our community, the Department also established a new requested service called a [Home Risk Assessment](#). Because staffing levels have remained the same since 2010, these risk reduction programs are not sustainable.

To address the increasing workload demands and the issues identified in the 2023 performance audit for city-owned land, the Department also created a new (sworn) Option Class. This new classification has a working title of Wildfire Prevention Specialist to oversee city-owned land and where it abuts privately owned property. These positions are also dedicated to community outreach efforts and specialize in wildfire preparedness presentations, evacuation planning, community risk assessments, creation of [Fire Safe Councils](#), [Community Wildfire Protection Plans](#) (CWPPs), [Firewise](#) communities and [Fire Adaptive Communities](#). These sworn positions are also deployable before, during and after wildfires due to their firefighting experience and qualifications. They also perform hazardous fuel mitigation activities through [Grant Funded Projects](#). One of these temporary grant funded programs help reduce encampment fires by 40% in 2025.

Three full-time Wildfire Prevention Specialist positions were requested and approved by city council in the amended Fy26 budget. Due to the ongoing budgetary challenges, they were eliminated. The Department still does not have any full-time staff dedicated to community outreach efforts or working with city staff responsible for city-owned land. Without these positions, there continues to be no training, oversight or enforcement of city-owned property. The Department continues to rely on temporary programs and limited grant funded opportunities. A request to fill these full-time positions will be submitted again on FY28.

**RECOMMENDATION 1.1:** The Fire-Rescue Department (Fire-Rescue) should establish and enforce productivity standards, goals, or similar performance targets and procedures based on reasonable expectations for conducting proactive brush management inspections. Finalized performance targets should be communicated to all appropriate employees within the Wildland Management and Enforcement section within Fire-Rescue so that all are aware of these expectations and monitored via routine reporting to management/supervisors. (Priority 1)

**Management Response: Agree with the Recommendation.** This is in process. Training begins on May 5, 2026, to incorporate new duties for Defensible Space Inspectors associated with the new Side Letter agreement. The training and updated written Employee Performance Plans will formalize new productivity standards, goals and performance targets with reasonable expectations. These will provide clear guidance on the minimum threshold for number of proactive inspections conducted while not sacrificing the quality of inspection. An inspection workflow has also been built into the wildfire inspection software that will also be communicated to all employees.

Another notable change associated with improving our programs and services was the recent title change of the Wildland Management and Enforcement section to [Wildfire Prevention and Mitigation](#). This change aligns with the Community Risk Reduction Division mission and updated Employee Performance Plans.

**Target Implementation Date:** May 5, 2026

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Andy Hanau, City Auditor, Office of the City Auditor

April 28, 2026

**RECOMMENDATION 1.2:** The Fire-Rescue Department (Fire-Rescue) should develop and implement a process to assign or approve brush management inspections in advance for inspectors and which enables inspectors to access their caseloads remotely so that inspections can be completed without physically having to go into the Civic Center Plaza to log into the inspection software. As part of this process, Fire-Rescue should also establish responsibilities for assigning inspections to inspectors. (Priority 2)

**Management Response: Agree with the recommendation.** This recommendation has been partially implemented. The Department continues development of the wildfire inspection module with its new inspection software management system 3Di. Flexible work arrangements already allow staff to start and finish in the field without physically having to go into the office. For some staff, this has been a preference because their workday typically begins at 6:30 a.m. and they cannot begin conducting inspections until 8 a.m.

The ability to access and assign caseloads in advance and remotely has already been built into the inspection software system and workflow. The Senior Code Compliance Supervisor position who will be primarily responsible for assigning caseloads retired in August 2025. The Department is currently awaiting approval of the Request to Fill (RTF), which has been delayed due to ongoing budgetary constraints. Once the position is filled, it will be part of their updated responsibilities in the written employee performance plan.

**Target Implementation Date:** January 1, 2027

**RECOMMENDATION 1.3:** The Fire-Rescue Department should inform and train inspectors on reassigning inspection cases in 3Di. (Priority 3)

**Management Response: Agree with the recommendation.** This recommendation has been partially implemented. Staff have been provided training through a series of meetings and demonstrations. This will require ongoing inspection workflow training and become part of the staff's updated written employee performance plans.

**Target Implementation Date:** January 1, 2027

**RECOMMENDATION 1.4:** The Fire-Rescue Department should establish responsibilities to regularly monitor and evaluate the effectiveness of the Proactive Brush Management Program. This monitoring should allow for management to evaluate whether brush management inspectors are keeping up with the productivity targets established in Recommendation 1.1, as well as ensuring that the new faster approach of focusing on the front of properties for proactive brush management inspections is effectively achieving program goals. (Priority 2)

**Management Response: Agree with the recommendation.** This is in process as mentioned in management's response to recommendation 1.1. While the Department is updating the written Employee Performance Plans to establish new productivity standards it will also ensure the effectiveness of the program will not sacrifice the quality of inspections with the front of property inspection approach. As previously noted in recommendation 1.1, the new duties and CWMS certification will help improve staff's expertise and resulting ability to identify violations that may exist while keeping up with productivity targets. This will help to support the threshold for the number of inspections it can reasonably inspect while maintaining inspection quality to effectively achieve the program goals.

When a new position is filled, a structured quality assurance and continuous improvement process will be established. This will evaluate inspection consistency, program outcomes, and the effectiveness of a new front-of-property inspection approach. This will include regular data review, in-the-field validation, and reporting mechanisms to ensure the program meets its intended risk-reduction goals and operates efficiently. The updated written employee performance plans for the vacant Senior Code Compliance Officer will include the established responsibilities to regular monitor and evaluate the effectiveness of the Proactive Inspection Program. Supervisors already have access to dashboards to show individual staff work productivity and performance goals. These dashboards show caseloads with charts and graphs representing the location, type, number, and frequency of inspections completed.

**Target Implementation Date:** January 1, 2027

**RECOMMENDATION 1.5:** The Fire-Rescue Department should develop and implement a process to effectively route proactive inspection cases in the Proactive Brush Management Program. The process could include grouping proactive inspections based on factors such as the parcel's location. (Priority 1)

**Management Response: Agree with the recommendation.** This process is partially implemented within the inspection software, which supports priority grouping and last inspection date. The Department will continue to develop and implement a process to effectively route inspection cases. However, additional development is needed to incorporate parcel-based filters, including the clustering or grouping of inspections based on parcel location where feasible.

Utilization of emerging technologies, performance metrics and geographic grouping are used where practical. Improvements in efficiency may be limited due to staffing levels and operational constraints in accessing canyon-rim parcels. This will require a balanced approach.

The Department is also implementing a risk-based modeling workflow using the Priority I-IV inspection system, consistent with a complaint and violation scoring matrix to prioritize inspections based on wildfire risk. Performance metrics will be updated to reflect a risk-based model, and emerging technologies are being evaluated to improve efficiency given limited staffing.

**Target Implementation Date:** July 1, 2027

**RECOMMENDATION 1.6:** The Fire-Rescue Department should enable or ensure that whichever information management system it uses to populate and assign inspector caseloads shows the date which a given property was last inspected. (Priority 2)

**Management Response: Agree with the recommendation.** This still needs to be developed. Refer to management response to recommendation 1.5.

The wildfire inspection module in 3Di is ideal for assigning caseloads and documenting violations. The system has limitations and can slow down if all parcels in the city are loaded into the program. 3Di is currently focused on the proactive program and parcel complaints

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only. Interra, which is a legacy system staff have used for years, has a better system capability to store the total number of parcels in the city, parcel lines and boundaries.

**Target Implementation Date:** July 1, 2027

**RECOMMENDATION 1.7:** The Fire-Rescue Department (Fire-Rescue) should review and update the list of parcels it plans to inspect under the Proactive Brush Management Program. As part of this update, Fire-Rescue should:

- a. Identify and determine whether it should Include other properties in a Very High Fire Hazard Severity Zone for proactive inspections under the Proactive Brush Management Program.
- b. Establish inspection frequency for the parcels it plans to inspect under the Proactive Brush Management Program.
- c. For parcels in a Very High Fire Hazard Severity Zone excluded from the Proactive Brush Management Program, Fire-Rescue should document its rationale for excluding them from the Proactive Brush Management Program (Priority 3)

**Management Response: Agree with the recommendation.** This recommendation has been partially implemented. As mentioned in response to recommendation 1.6, the 3Di wildfire inspection module is primarily being used for the Proactive Program and complaints.

The Department will review and update the list of parcels included in the Proactive Brush Management Program using a risk-based framework. All parcels within the VHFSZ have been incorporated into the Department’s tracking system to establish a comprehensive baseline. The Department will apply a structured risk model to prioritize parcels based on wildfire risk, including factors such as topography, vegetation loading, fire history, and response activity.

Inspection frequency will be established based on assigned risk levels to ensure higher-risk parcels are evaluated more frequently. For parcels within the VHFSZ that are not selected for proactive inspection, the Department will document the rationale for exclusion within its tracking system. This approach aligns with the Department’s broader transition to a risk-based model and supports a more efficient and targeted inspection program.

The Department is currently awaiting approval of the Request to Fill (RTF) for an Information Systems Analyst II with a working title of Wildfire Risk Analyst which has been delayed due to ongoing budgetary constraints. Once this position is filled, we will be able to fully implement this recommendation after a reasonable time has been provided.

**Target Implementation Date:** January 1, 2027

**RECOMMENDATION 2.1:** The Fire-Rescue Department should complete follow-up inspections for the 204 proactive inspection cases we identified with outstanding violations after the last inspection to verify whether the property owner and/or resident addressed the documented violations noted at the time of the initial inspection. (Priority 1)

**Management Response: Agree with the recommendation.** This effort is in progress, and the Department is actively reviewing all existing proactive inspection cases with outstanding violations to complete appropriate follow-up inspections.

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Cases are being prioritized using a risk-based scoring model that focuses on life safety and wildfire risk to ensure higher-risk properties are addressed first. The review has identified a subset of low-impact violations that do not warrant formal enforcement, contributing to the existing backlog due to staffing levels.

The Department is implementing standardized workflows to ensure consistent and efficient resolution, including clear criteria for enforcement, education, or voluntary compliance. Performance metrics and follow-up processes are being aligned with this risk-based approach to improve overall program effectiveness and reduce outstanding violations.

**Target Implementation Date:** January 1, 2027

**RECOMMENDATION 2.2:** The Fire-Rescue Department should develop and implement a process, which could include system alerts or reminders, to ensure that inspectors consistently conduct follow-up inspections for parcels with documented violations to verify whether violations are addressed. (Priority 1)

**Management Response: Agree with the recommendation.** The Department will develop and implement a process, including system-based alerts and reminders within its inspection software, to ensure consistent follow-up inspections for parcels with documented violations.

This effort is in progress, supported by new software capabilities and staff training, and includes a comprehensive review of all existing complaints and open inspections. Cases are being prioritized using a risk-based scoring model focused on life safety and wildfire risk to ensure timely follow-up on higher-risk violations.

Standardized workflows and decision criteria will be established to ensure consistent follow-up, documentation, and resolution of cases. The Department has identified a subset of low-impact violations that do not warrant formal enforcement, and updated procedures will distinguish between conditions requiring enforcement and those appropriate for education or voluntary compliance. This approach will improve consistency, reduce backlog, and ensure follow-up inspections are conducted effectively in alignment with program goals.

**Target Implementation Date:** January 1, 2027

**RECOMMENDATION 2.3:** The Fire-Rescue Department should update its inspection manual to include workflow information for proactive brush management inspections and update the workflow for complaint inspections to provide guidance on when non-compliance fees should be assessed. (Priority 1)

**Management Response: Agree with the recommendation.** The Department will update its inspection manual to include workflow guidance for proactive and complaint inspections, including when non-compliance and reinspection fees should be assessed.

These workflows have been developed within the wildfire inspection software module and will be formalized through the updated manual to ensure consistency and clarity in application.

**Target Implementation Date:** January 1, 2027

**RECOMMENDATION 2.4:** The Fire-Rescue Department should pursue enforcement and issue fees and penalties as appropriate, in alignment with its inspection workflow in Recommendation 2.3, to better ensure program effectiveness and risk mitigation. (Priority 1)

**Management Response: Agree with the recommendation.** A risk-based enforcement process has been implemented and will be formally incorporated into the inspection workflow and manual referenced in Recommendation 2.3.

The Department will pursue enforcement actions, including fees and penalties, in alignment with this workflow, ensuring actions are proportionate to wildfire risk and life safety impact. Higher-risk violations will be prioritized for timely enforcement, while lower-risk conditions may be addressed through education or voluntary compliance when appropriate.

Standardized workflows, decision criteria, and documentation requirements will support consistent and defensible enforcement actions. This approach aligns enforcement with risk, improves compliance outcomes, and ensures resources are focused on the most critical hazards.

**Target Implementation Date:** July 1, 2027

**RECOMMENDATION 2.5:** The Fire-Rescue Department (Fire-Rescue) should update its non-compliance fee structure for brush management inspections to ensure that the fees are current and align with those charged by comparable jurisdictions, such as the examples provided by, but not limited to, the cities of Berkeley, Beverly Hills, Burbank, Los Angeles, Oakland, San Jose, County of Los Angeles, and the San Diego County Fire Protection District. (Priority 2)

**Management Response: Agree with the recommendation.** The Department agrees and will align non-compliance fees and benchmarking with comparable jurisdictions during the next comprehensive user fee study.

While the Department agrees with the recommendation, it has taken a different approach. In FY26 the Department did create a new \$50 reinspection user fee. For this current user fee cycle, we will utilize a process that allows for an initial inspection, a reinspection fee of \$50, and the \$300 non-compliance fee for third and subsequent inspections. There is also an option for a referral for a forced abatement to a non-cost third party contractor who can issue a lien on the property.

The Department's recent approach has been more focused on improving fire department-community collaboratives to achieve the same objectives through education consistent with the approach in the recent release of our [Zone 0 Guidelines for Existing Structures](#). This is one of several reasons we were recently recognized by the Office of the State Fire Marshal. It is also why we were invited to be presenters on Zone 0 with the Board of Forestry and Fire Protection on April 23, 2026, in Calabasas, California.

Another notable effort was our coordination with the [Fire Safe Council of San Diego County](#) to create over 50 fire safe councils, and new Firewise communities. Fire-Rescue believes we can achieve voluntary compliance and reduce risk through improved outreach and education efforts and creation of community-based fire ambassadors. While non-compliance fees are a necessary economic incentive to change bad behavior, the current \$300 non-compliance fee is still an option in addition to a referral for forced abatement.

The Department also works with the Housing Protection and Civil Compliance Unit (HPU) for Public Nuisance properties. We have also been pursuing a no-cost contract like the current one with Fire Protection Services Incorporated (FPSI) for vacant parcels. This has been a very effective abatement service at no additional cost to the city and saves staff time. The contract for vacant parcels was recently increased from an annual inspections cycle to twice per year. It also changes from the maintenance of annual grass and weeds to the full scope of the Brush Management Regulations in [San Diego Municipal Code Section 142.0412](#).

We also are finalizing another Request for Information (RFI) to pursue another no-cost contract with Purchasing and Contracting for the abatement of improved properties (with a structure). This contract will allow our staff to refer the non-compliant inspections to the contractor for forced abatement after work authorization is signed off. This process will improve efficiency and allow our staff to continue conducting outreach efforts and inspections.

**Target Implementation Date:** July 1, 2028

**RECOMMENDATION 2.6:** After the Fire-Rescue Department (Fire-Rescue) implements Recommendation 2.5, Fire-Rescue should update the Notice of Violation template to include all applicable penalties. (Priority 2)

**Management Response: Agree with the recommendation.** This Notice of Violation template was updated. This has been completed and provided to the Office of the City Auditor.

**Target Implementation Date:** April 1, 2026

**RECOMMENDATION 2.7:** The Fire-Rescue Department should present a publicly-available report to the appropriate Council bodies, such as the Public Safety Committee, on the status of brush management inspections, and should seek guidance from Council regarding the desired frequency of such a report. The update should specifically address inspections conducted under the Proactive Brush Management Program and Weed Abatement and Brush Complaint Program:

- a. The number of parcels inspected for each program;
- b. The number of parcels with identified brush management violations by inspection type (e.g., initial inspection, first reinspection, etc.) and the extent to which re-inspections were conducted for each inspection type;
- c. Number and total amount of reinspection fees or penalties assessed, and collected, including abatements including by inspection type; and,
- d. Alternative options to promote consistency of actual fee collection. (Priority 3)

**Management Response: Agree with the recommendation.** This is partially implemented. The Department can provide a general report that provides this information. The full implementation of a publicly available report that a Community Risk Reduction Division should provide is based on the NFPA 1300 standards.

This effort is being developed as part of the Department’s wildfire inspection software module. In parallel, the Department is advancing an [NFPA 1300 Community Risk Assessment Report](#) to provide a more comprehensive evaluation of wildfire risk. The report will establish risk priorities based on brush complaints, inspections, and home risk assessments, while

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incorporating factors such as fire history, topography, canyon adjacency, vegetation type, and fuel loading.

This information will be integrated into a GIS-based platform and publicly available report. Implementation is dependent on the Information Systems Analyst II (Wildfire Risk Analyst) position, which is currently pending approval through the Request to Fill process.

**Target Implementation Date:** July 1, 2028

Thank you for the opportunity to provide responses to these recommendations. Management appreciates your team's professionalism throughout this review.

Thank you,

*Robert Logan*

Robert Logan  
Chief, Fire-Rescue Department

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cc: Honorable City Attorney Heather Ferbert  
Paola Avila, Chief of Staff, Office of the Mayor  
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