

Performance Audit of the City's Brush Management on City-Owned Land

Why OCA Did This Study

The City of San Diego (City), like other cities throughout California, faces an increased threat of wildfires as climate change, drought conditions, and a buildup of dry vegetation have led to an increase in wildfire frequency and intensity.

In areas adjacent to structures and dwellings, brush management is used to create a defensible space that provides protection from an approaching wildfire and minimizes the spread of a structure fire to wildlands or surrounding areas. According to the Municipal Code, the City is generally responsible for performing brush management on public land adjacent to existing structures to achieve 100 feet of defensible space.

The objective of this audit was to determine whether the City conducts regular and effective brush management on City-owned lands within high wildfire risk zones.

What OCA Found

Finding 1: The City lacks comprehensive brush management oversight, causing inconsistent and potentially ineffective brush management efforts by some departments with significant amount of land in Very High Fire Hazard Severity Zones.

- Although the Fire-Rescue Department (Fire-Rescue) is responsible for enforcing State and local fire codes and for fire prevention and mitigation, it **does not proactively monitor or inspect City-owned lands to ensure compliance with brush management regulations.**
- A Citywide brush management implementation policy could ensure consistent brush management efforts and compliance.
- Fire departments in other cities have a proactive role in overseeing and coordinating brush management and fire prevention efforts on city-owned land.

Exhibit 5: We Estimate That There are Approximately 3,200 Acres of City-Owned Lands Within Very High Fire Hazard Severity Zones and Within 100 Feet of a Structure, Managed by at Least 10 Different City Departments

Department	Number of acres located in a Very High Fire Hazard Severity Zone and within 100 feet of a structure*	Percent
Parks and Recreation	2,039 **	64%
PUD - (Wastewater and Water)	649	20%
Transportation	206***	6%
DREAM (Includes Airports)	190	6%
Environmental Services	58	2%
Police	22	1%
Stormwater	21	1%
Fire-Rescue	10	< 1%
Library	7	< 1%
Economic Development	0.4	< 1%
Grand Total	3,203*	100%

Notes:

* Not all of the acres listed may necessarily need brush management; for example, the Municipal Code exempts 100-foot defensible space requirements for structures built after 1989 or areas where the Fire Chief has approved an alternative compliance that provides sufficient defensible space, so the number of acres subject to the City's brush management requirements is lower than 3,203; however, we had no feasible way to quantify that number.

** These 2,039 acres under Parks and Rec's purview includes 1,293 acres managed by Parks and Rec Open Space Division, 404 acres managed by Parks and Rec Community Parks I and II Divisions, and 336 acres managed Parks and Rec Regional Parks Division, among others.

***This estimate also incorporates additional information provided by Parks and Rec Open Space Division.

Source: OCA generated based on EGIS geospatial analysis of Building Outlines (2016 LiDAR), City-Owned Land, Very High Fire Hazard Severity Zones, and information provided by Parks and Rec Open Space Division.

Finding 2: The Parks and Recreation Department Open Space Division has a program to perform regular and effective brush management; however, the City should implement a more coordinated approach to ensure other high fire risk City-owned lands undergo regular brush management.

Brush management for the purpose of creating defensible space is crucial to reduce wildfire risk. However, we found that **the City does not have a process to ensure regular and effective brush management on all required land**, and of the departments with significant brush management responsibilities that we reviewed, **only the Parks and Rec Open Space Division has a program to ensure regular and effective brush management on land within its purview.**

- The Transportation Department and Public Utilities Department’s brush management efforts are primarily reactive and generally have less systematic processes to ensure proactive regular brush management on land within their purview.
- Departments’ siloed approach to performing brush management results in irregular and inefficient brush management, which increases wildfire risk.

Exhibit 7: Brush Management Efforts are Not Consistent Across Departments

	Parks and Rec Open Space Division	PUD	Transportation
Performs comprehensive brush management?	✓	✗	✗
Provides brush management trainings to staff and contractors?	✓	✓*	✗
Utilizes biologists on site to account for sensitive animal and plant species?	✓	✓**	✗
Monitors efficacy of vendor performance?	✓	✓***	✗
Approximate number of acres located in Very High Fire Hazard Severity Zone and within 100 ft of a structure	1,293	649	206

Notes:

*PUD has trainings pertaining to navigating sensitive plant and animal species.

**According to PUD, it has two Environmental Biologist III positions that are currently vacant; however, it noted that its planners accompany field crews as needed to account for sensitive animal and plant species.

***According to PUD, it completes contractor evaluations as needed as required per its contract with its weed abatement/brush management vendor.

Source: OCA generated based on interviews with Parks and Rec, Transportation, and PUD; review of Parks and Rec training materials and contractor evaluations; and information provided by Open Space Division and City GIS data.

- Better coordination and integration within and among departments can mitigate the threat of wildfire in some of the riskiest areas in the City, increase operational efficiencies, and help address common complaints from residents.
- City departments have not established agreements to coordinate work and leverage resources amongst each other to ensure regular and effective brush management on all required City-owned land.

What OCA Recommends

We made seven recommendations to ensure consistent and effective brush management on required City-owned land. Key recommendation elements include:

- The Chief Operating Officer (COO) should implement an Administrative Regulation that directs Fire-Rescue to identify and maintain information on City-owned lands requiring brush management and establishes policies and procedures for Fire-Rescue to proactively monitor these lands for compliance with brush management.
- The COO should consider consolidating brush management responsibilities to the extent operationally and fiscally possible.
- Parks and Rec should incorporate certain paper streets into its brush management program.
- City departments with significant brush management responsibilities should strengthen opportunities for collaboration.
- Parks and Rec should obtain feedback on contractor performance as applicable from other departments, and should continue to conduct quarterly contractor performance evaluations.
- Fire-Rescue and Parks and Rec should determine the extent to which additional resources may be needed to carry out brush management activities and responsibilities.

City Management agreed to implement all seven recommendations.

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