

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

JULY 2023 | OCA-24-01

Finding 1

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

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.

Andy Hanau, City Auditor

Matthew Helm, Assistant City Auditor

Danielle Knighten, Deputy City Auditor

Nathan Otto, Principal Performance Auditor

Marye Sanchez, Performance Auditor

Kayla Edwards, Performance Auditor

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The Office of the City Auditor would like to thank staff from the following departments and agencies for their assistance during this audit:

- Fire-Rescue Department
- Parks and Recreation Department
- Transportation Department
- Public Utilities Department
- Department of Real Estate and Airport Management
- Department of Information Technology EGIS Team
- Purchasing & Contracting Department
- Fire Safe Council
- San Diego County Fire Protection District
- City of Oakland Fire Department
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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.

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

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Background

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. Having experienced some of the largest wildfires in California's history, including the 2003 San Diego Cedar Fire that claimed 15 lives and destroyed 2,820 structures, as well as the 2007 Witch Creek and Guejito fires that claimed 2 lives and destroyed 1,650 structures, the City is aware of the enormous human and financial costs associated with wildfires.¹ To mitigate these impacts, there is a pressing need for effective wildfire prevention and minimization strategies that combine increased wildfire resistance and comprehensive brush management.

The State of California has classified lands based on fire hazard severity to assist local governments in fire prevention and mitigation efforts.

Local agencies are responsible for the prevention and suppression of fires in Fire Hazard Severity Zones.

State law requires the California Department of Forestry and Fire Protection (CALFIRE) to classify areas of significant fire hazard based on fuel load, terrain, weather, and other relevant factors identified as major causes of wildfire spread. These areas are designated as Fire Hazard Severity Zones and depict hazard levels from moderate to high and very high, based on fire behavior and the probability of flames and embers threatening buildings. Local agencies are responsible for the prevention and suppression of fires in Fire Hazard Severity Zones for lands, except for lands that are primarily the financial responsibility of the State of California or federal agencies.

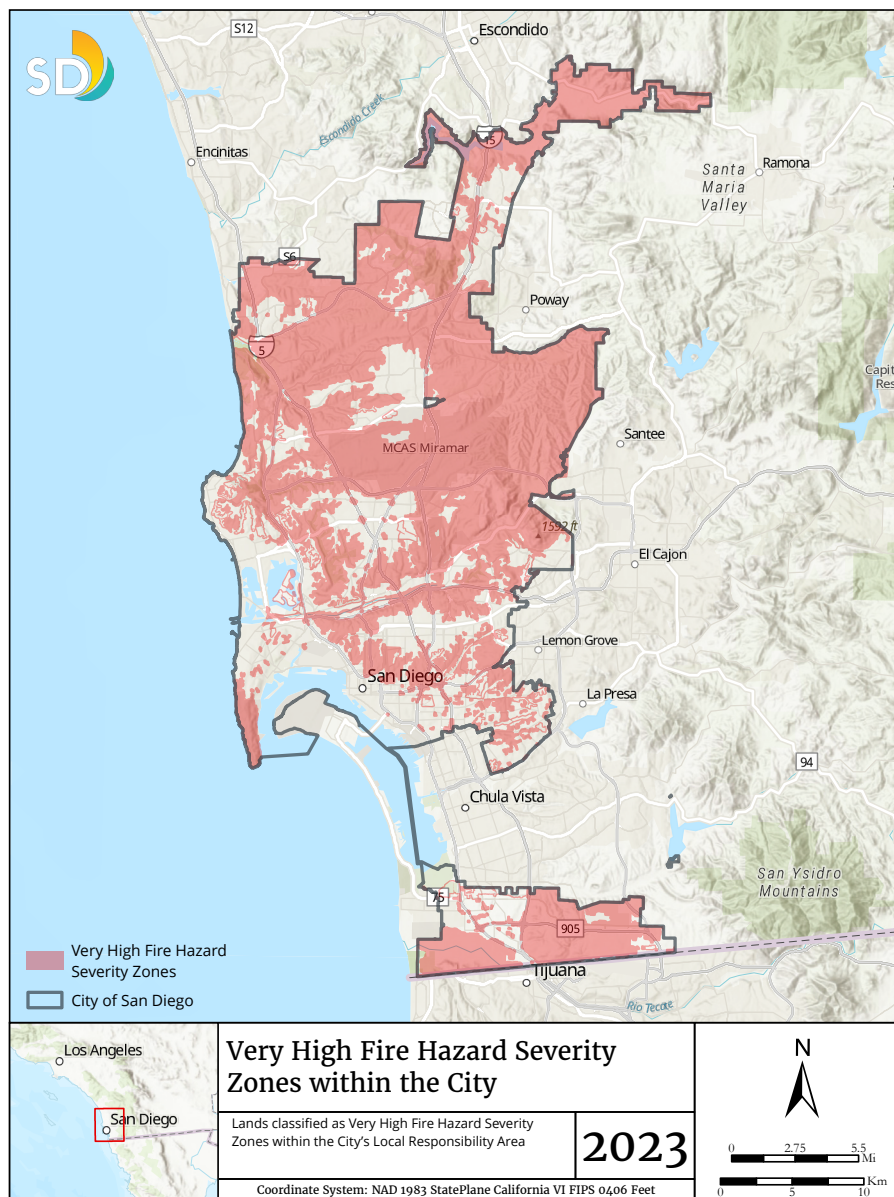
Fire Hazard Severity Zone maps were created as a planning tool for local government officials to identify where to apply fire mitigation measures and reduce potential fire intensity to protect life, property, and natural resources. These maps are used to implement building standards for new construction, disclose natural hazards during property sales, establish 100-foot defensible space clearing requirements around buildings, and establish property development standards.

¹ The Cedar Fire destroyed 2,820 structures across San Diego County, of which 335 structures were located in the City. The Witch Creek and Guejito fires combined destroyed 1,650 structures across San Diego County, of which 365 structures were located in the City.

As State law requires, the City adopted its current Fire Hazard Severity Zone map through local ordinance in 2009. The City incorporated additional areas in its Fire Hazard Severity Zone map that were not zoned by CALFIRE based on the State’s modeling criteria. The City also classified some areas as very high that the State had identified as high. **Exhibit 1** below shows Very High Fire Hazard Severity Zones within the City.

Exhibit 1

Areas in the City That are Designated as Very High Fire Hazard Severity Zones



Source: Department of IT, City of San Diego GIS data of Very High Fire Hazard Severity Zones.

Brush management is a strategy to reduce fire hazards around structures.

Brush management involves thinning and pruning vegetation for the purposes of:

Brush management is used to create a defensible space that provides protection from an approaching wildfire and minimized the spread of a structure fire to wildlands or surrounding areas.

- Reducing fire hazards around structures;
- Reducing the fuel load adjacent to habitable structures to better help firefighters protect life and property when fires do occur; and
- Minimizing the impacts to undisturbed native or naturalized vegetation.

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. Both State law and the Municipal Code generally require 100 feet of defensible space to be maintained around structures within Very High Fire Hazard Severity Zones.² Further, the State and Municipal Code break down the 100-foot defensible space into Brush Zones 1 and 2, and provide guidance for performing brush management within these zones.³ As shown in **Exhibit 2** below, Brush Zone 1 typically extends 35 feet out from the structure's edge, whereas Zone 2 typically extends beyond Zone 1 for the remaining 65 feet.⁴

Exhibit 2

Brush Zones 1 and 2 Typically Make Up 100 feet of Defensible Space



Source: Image obtained from the Parks and Rec Open Space Division's brush management program training materials.

- 2 As discussed in Finding 2, the City's requirements are stricter than California State law, which requires brush management to maintain 100 feet of defensible space but does not apply to land beyond the property line.
- 3 Although typically brush Zones 1 and 2 should sum to 100 feet, as Zone 1 increases, Zone 2 decreases accordingly, which may result in less than 100 feet of total defensible space. For example, if Zone 1 exceeds 35 feet, Zone 2 may be discounted by 1.5 feet for every foot that Zone 1 exceeds 35 feet.
- 4 According to Parks and Rec, departments only perform brush management in Zone 2 brush on City-owned land.

The City has taken multiple steps to enhance its fire prevention efforts.

In addition to State-mandated fire prevention measures, the City has taken extra steps to enhance its fire prevention efforts. The Fire-Rescue Department (Fire-Rescue) takes an active role in implementing the City's brush management regulations on private property through its proactive defensible space program. The program, which was developed and implemented as a result of the 2007 wildfires, focuses on inspections of properties located on canyon rims in Very High Fire Hazard Severity Zones. According to Fire-Rescue, it inspects approximately 46,000 private properties located along canyon rims.

A 2010 audit from our office recommended that the City take additional steps to ensure City departments comply with brush management regulations.

After the 2007 wildfires, the Office of the City Auditor (OCA) conducted an audit related to brush management in 2010 and found that the City did not adequately ensure that departments complied with brush management regulations.⁵ Specifically, we found that Fire-Rescue forwarded brush management complaints to departments but did not monitor or follow up to ensure that departments resolved the complaints, and did not track City-owned land that required brush management. To address these findings, OCA recommended:

- Fire-Rescue establish policies and procedures for departments to report the status of complaints and the steps taken to address violations, including a process for informing the Mayor and/or the Chief Operating Officer of departments that do not comply with these policies and procedures;
- The City Administration determine the number of lots managed by City departments; and
- Fire-Rescue ensure departments are aware of their brush management responsibilities.

We found that these recommendations were implemented at one time; however, as detailed in the findings, several issues appear to have re-emerged, such as lack of proactive identification of brush management responsibilities by department.

⁵ Performance Audit of the Fire Prevention Activities within the City of San Diego, issued October 2010: <https://www.sandiego.gov/sites/default/files/11-006.pdf>

Audit Scope and Objective

The scope of this audit was brush management and fire prevention efforts performed on City-owned land from FY2019 through FY2023. Specifically, our scope included the brush management and fire prevention efforts of the Parks and Recreation Department, Public Utilities Department, Transportation Department, and Fire-Rescue Department, with a particular focus on the roles of Fire-Rescue and Parks and Recreation Open Space Division's brush management program. The scope did not include the Department of Real Estate and Airport Management, the San Diego Police Department, the Stormwater Department, the San Diego Public Library, the Economic Development Department, and the Environmental Services Department as the number of acres they manage in Very High Fire Hazard Severity Zones and within 100 feet of a structure is relatively low. Lastly, the scope did not include brush management on private properties.

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

Finding 1

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

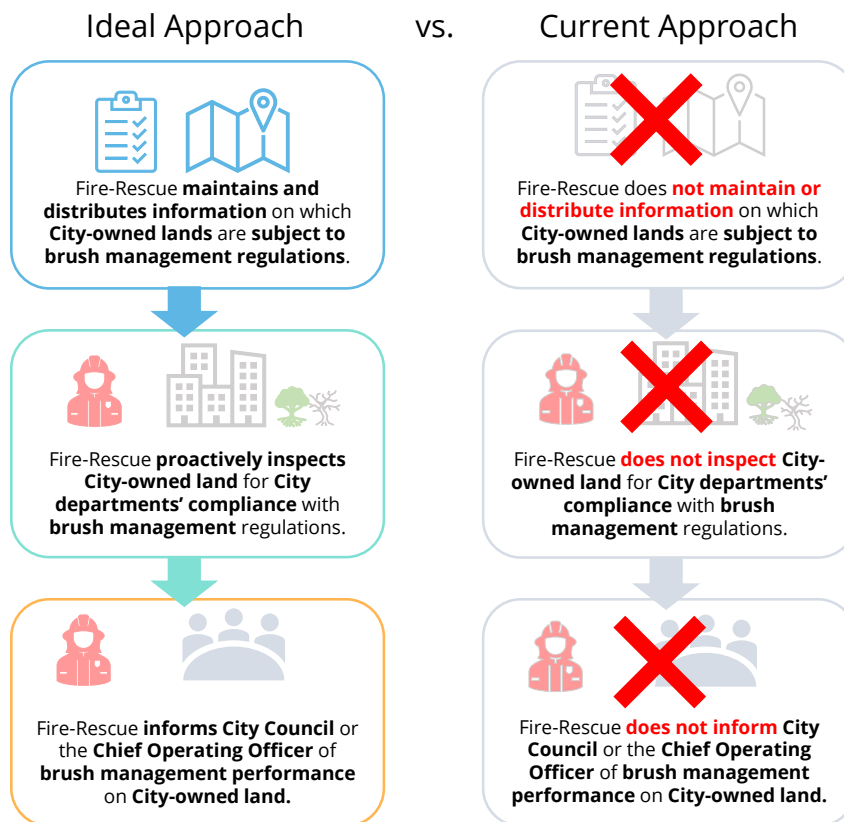
The Fire-Rescue Department (Fire-Rescue) is responsible for enforcing State and local fire codes and for fire prevention and mitigation. However, the absence of a Citywide brush management program and centralized process to enforce brush management regulations has resulted in inconsistent efforts across City departments. This approach can potentially lead to increased fire hazards and risks to property damage and public safety. For example, as discussed below, we found that at least 10 City departments manage very high fire risk lands that could be subject to brush management regulations.

Although 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.

The Fire-Rescue Department (Fire-Rescue) has a significant role in ensuring brush management and fire prevention on both private and City-owned lands. According to the City's Municipal Code, the Fire Marshal is responsible for enforcing regulations related to fire prevention and mitigation. These efforts include regularly inspecting buildings and premises for fire safety and determining if brush management is necessary in certain areas and situations. However, while this responsibility applies to both private and public property, as illustrated in **Exhibit 3**, we found that Fire-Rescue does not adequately monitor City-owned land to ensure compliance with brush management regulations.

Exhibit 3

Fire-Rescue Does Not Proactively Monitor or Inspect City-Owned Land for Compliance with Brush Management Regulations



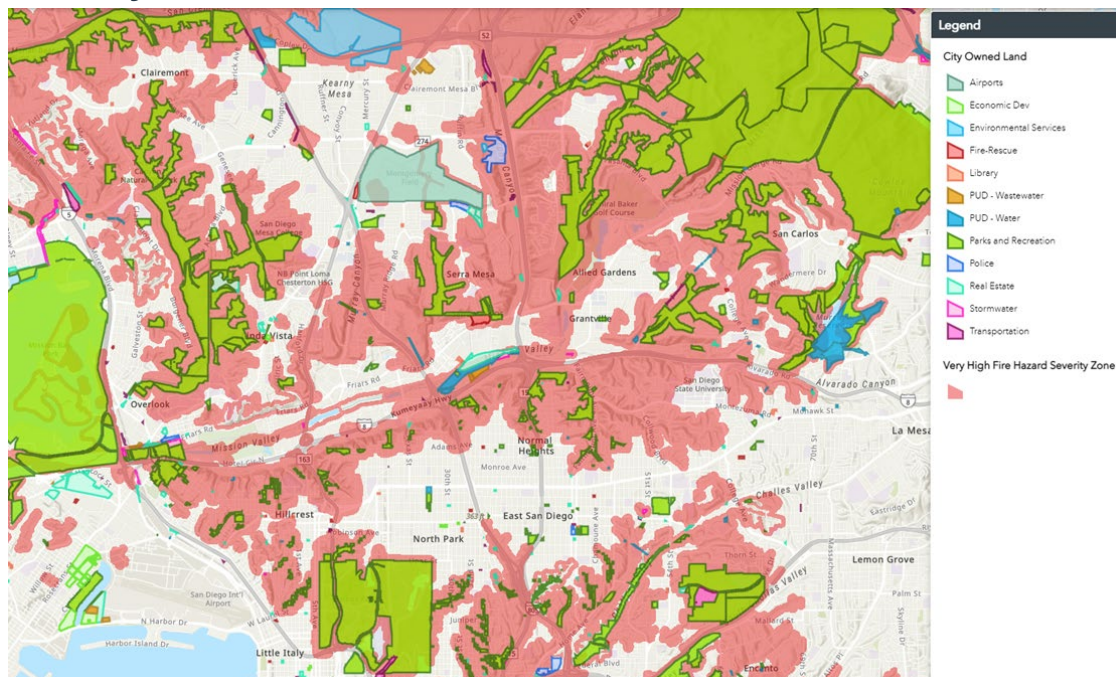
Source: OCA generated based on interviews with Fire-Rescue, the City of Santa Barbara Fire Department, and the City of Oakland Fire Department, and review of the City’s Charter pertaining to Administrative Regulations.

Fire-Rescue primarily relies on complaints to inspect City-owned land for compliance with brush management regulations rather than proactively monitoring lands for compliance. The department conducts inspections of City-owned lands in response to complaints received, or when Fire-Rescue staff observe potential violations during proactive defensible space inspections of private property. When violations are observed, Fire-Rescue has a referral process in place for managing departments to take corrective action. This process includes acknowledgement and response from the managing department regarding the status of the referral. While Fire-Rescue has a process in place to ensure departments report back on the status of violations outlined in fire referrals, conducting inspections primarily in response to complaints may pose several risks, including the possibility of overlooking areas with significant wildfire risk.

Fire-Rescue does not maintain a comprehensive list of City-owned lands subject to brush management regulations.

Knowing which City-owned lands are subject to brush management regulations is critical to mitigating fire risk because it enables the City to identify areas where brush management needs to occur to reduce wildfire risk. However, we found that Fire-Rescue does not maintain a comprehensive list of City-owned lands subject to brush management regulations. Instead, when City lands are found to be in violation of brush management regulations, for example, as part of a complaint, Fire-Rescue provides departments with a map outlining the area that needs to be brought into compliance. The absence of more proactive and systematic guidance leaves departments with an incomplete understanding of the areas that require brush management, leading to an inconsistent brush management approach across the City. As shown in **Exhibit 4** below, at least 10 City departments manage land with significant fire hazard risk that could be subject to brush management regulations.

Exhibit 4
At Least 10 City Departments Manage Land Within Very High Fire Hazard Severity Zones



Note: This map is available online at: <https://webmaps.sandiego.gov/portal/apps/webappviewer/index.html?id=15ca564eaab74be89bf95928117bfcc9>

Source: Image captured based on EGIS geospatial analysis of Building Outlines (2016 LiDAR), City-Owned Land, Very High Fire Hazard Severity Zones.

A 2010 audit from our office found similar issues with a lack of brush management oversight. Specifically, it found that Fire-Rescue was not monitoring whether public entities comply with brush management and other fire prevention requirements. The audit thus recommended that the Administration determine the number of lots managed by City departments and that Fire-Rescue ensure departments are aware of their brush management responsibilities.

As a result of that audit, in 2011, Fire-Rescue issued a list of lands subject to brush management regulations and a memorandum addressing complaint processes and departmental responsibilities for brush management. However, as part of this current audit, the issue appears to have re-emerged, as we and Fire-Rescue were unable to locate comprehensive documentation outlining the specific City-owned lands for which each department is responsible for conducting brush management.

Collectively, these 3,203 acres where City departments are responsible for brush management are nearly three times the size of Balboa Park, or approximately 2,400 football fields.

Because the City currently lacks comprehensive documentation of the lands for which it is responsible for brush management, we worked with the City's EGIS team to estimate the number of acres of City-owned land in Very High Fire Hazard Severity Zones and within 100 feet of a structure. As shown in **Exhibit 5**, there are approximately 3,203 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. Collectively, these 3,203 acres where City departments are responsible for brush management are nearly three times the size of Balboa Park, or approximately 2,400 football fields.

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
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Notes:

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***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.

The lack of coordination and oversight has resulted in inconsistent brush management efforts on City-owned land in Very High Fire Hazard Severity Zones.

We found differences in the consistency and effectiveness of departments' brush management efforts due to a lack of coordinated efforts and proactive guidance and oversight. For example, while Parks and Recreation (Parks and Rec) Open Space Division has a program to ensure regular and effective brush management that includes a regular rotation schedule, internal trainings, on-site biologists, and contractor evaluations, other City-owned lands in Very High Fire Hazard Severity Zones have been left without regular brush management. Specifically, as discussed in Finding 2, this approach has resulted in reactive brush management on land managed by the Transportation Department (Transportation) and Public Utilities Department (PUD).

A Citywide brush management implementation policy could ensure consistent brush management efforts and compliance.

The City has not established an implementation process for Fire-Rescue's authority to ensure centralized brush management oversight.

Given the broad expanse of very high fire risk lands managed by the City and the likely thousands of adjacent private and public structures and their inhabitants, it is essential for the City to ensure it consistently and effectively conducts brush management on its property. However, in addition to not maintaining comprehensive documentation that specifies where the City needs to conduct brush management and which department needs to conduct the work, the City has not established an implementation process for Fire-Rescue's authority to ensure centralized brush management oversight. These factors have led to inconsistent brush management efforts, which are described in Finding 2, that have resulted in unaddressed brush management in some high wildfire risk areas of the City.

However, the City can mitigate this risk by utilizing its established internal mechanisms and processes to provide departments guidance and ensure departmental accountability. For instance, the City uses administrative regulations to direct ongoing administrative policies and procedures. These directives are issued under the authority of the Mayor and/or Chief Operating Officer and provide general rules and regulations to ensure proper conduct of departments and enforcement of the City's Municipal Code. Therefore, an administrative regulation can be used to ensure consistency by establishing processes for accountability and monitoring of brush management activities.

Additionally, periodically informing City leadership can help to ensure that the administrative regulation is being followed. Implementing and reporting on an administrative regulation can also help maintain consistency in brush management over time and communicate adjustments when regulations and directives change, such as when CALFIRE issues new fire hazard severity zones maps for local responsibility areas later this year.

Fire-Rescue has prioritized its limited resources for brush management compliance on inspections of private properties.

Fire-Rescue faces challenges in balancing the competing needs of ensuring brush management compliance on City-owned land and mitigating fire risk on private property. While Fire-Rescue is ultimately responsible for fire protection and prevention, State law does not require specific enforcement activities, such as inspections for defensible space on either private or public land. Given the absence of specific inspection requirements, Fire-Rescue has flexibility to determine where to allocate its resources.

With limited resources available, the department has prioritized proactive inspections of private property.

Furthermore, Fire-Rescue acknowledged that its involvement in monitoring brush management on City-owned lands has been limited due to resource and staffing constraints. Therefore, with limited resources available, the department has prioritized proactive inspections of private property. As mentioned in the Background, Fire-Rescue has established a proactive inspection program for private properties located in Very High Fire Hazard Severity Zones in the canyon rim. These inspections offer opportunities to enforce brush management regulations and educate property owners on effective fire prevention practices. However, while this approach may help reduce wildfire risk, it is not sufficient to meet the City's Municipal Code requirements to conduct brush management on City-owned lands.

Fire departments in other cities have a proactive role in overseeing and coordinating brush management and fire prevention efforts on city-owned land.

We found that Fire-Rescue does not:

- Ensure that City-owned lands in need of regular brush management are being identified and addressed;
- Play an active role in improving collaboration between City departments; and
- Have a systemic evaluation process for brush management work on City-owned lands.

In contrast, we found that other cities have leveraged resources from their local fire departments to ensure regular and efficient brush management on city-owned land. For example, the City of Oakland has established the Vegetation Management Unit, under the direction of its fire department, to oversee compliance of brush management for public and private properties in the Very High Fire Hazard Severity Zones. According to the City of Oakland Fire Department, it annually inspects all city-owned lands located in Very High Fire Hazard Severity Zones for compliance with brush management.

Other cities have leveraged resources from their local fire departments to ensure regular and efficient brush management on city-owned land.

Similarly, the City of Santa Barbara Fire Department (SBFD) has adopted a proactive approach to addressing potential wildfire risks on city-owned land. The City of Santa Barbara developed a Community Wildfire Protection Plan that assessed and evaluated wildfire hazards, identified High Fire Hazard Areas and city values potentially threatened by wildfire, and outlined action items to guide its implementation.⁶ SBFD and other responsible city departments are tasked with implementing action items to achieve the goal of protecting lives, property, and natural resources threatened by wildfire.

SBFD works with all city departments and staff to increase their knowledge, awareness, prevention, and preparedness for wildfire. These efforts include developing annual trainings on wildfire safety to train staff working in High Fire Hazard Areas, developing the process for fire complaints, developing fire prevention and defensible space requirements, and coordinating with city departments during planning, vegetation management, and other implementation tasks to streamline efforts and maximize the use of available city resources.

⁶ City values encompass a wide range of elements, including life; property, such as homes, businesses, and city infrastructure; as well as resources, including natural, economic, biological, cultural, and visual resources susceptible to the threat of wildfire.

SBFD also noted that it annually notifies departments about the lands that require brush management work.

As an additional component of wildfire risk mitigation, SBFD identifies and prioritizes vegetation management units in High Fire Hazard Areas, including land outside of defensible space requirements on both city-owned and private property. SBFD develops work plans specifying the areas to be treated and best methods to be used. A site-specific biological evaluation is conducted for the treatment area, and a qualified biologist is consulted during the preparation of the work plans to avoid or reduce impact to biological resources. SBFD compiles publicly available after-action reports documenting site conditions after work is completed and annually evaluates this information to assess vegetation management success and guide further activities.

As shown in **Exhibit 6**, while all three cities are subject to the same State wildfire regulations, have areas of land within the Very High Fire Hazard Severity Zones, and have been impacted by wildfires that have caused significant property damage, their approaches to brush management oversight differ.

Exhibit 6
Other Fire Departments Adopt More Proactive Approaches to Wildfire Mitigation

	San Diego Fire-Rescue	Oakland Fire Department	Santa Barbara Fire Department
Identify & Prioritize Lands			
Lead Coordination Efforts			
Establish Work Plans			
Assess Brush Management Effectiveness			
Publicly Report Progress			

Source: OCA generated based on benchmarking with the Oakland Fire Department and Santa Barbara Fire Department.

The Oakland and Santa Barbara Fire Departments appear to have a more active role in implementing and monitoring brush management work compared to the City of San Diego, demonstrated by the Oakland Fire Department’s annual inspections of all public and private lands within the Very High Fire Hazard Severity Zones and the Santa Barbara Fire Department’s guidance to departments.

Ultimately, leveraging the expertise and insights of fire professionals could enhance the City of San Diego’s brush management planning, communication, and quality assurance with respect to fire mitigation. This approach would not only address current operational inefficiencies (discussed in more detail in Finding 2), but could also lead to more effective program outcomes in preventing wildfires and protecting lives and property from fire.

Recommendations

To ensure that the City has a comprehensive process to oversee brush management on City-owned land, we recommend:

Recommendation 1.1

To improve accountability for brush management on City-owned land, the Chief Operating Officer should adopt and implement an Administrative Regulation that:

- a. Requires the Fire-Rescue Department (Fire-Rescue) to identify and maintain information on the location of lands managed by City departments subject to brush management regulations, and to distribute this information to the relevant City departments; and
- b. Establishes policies and procedures (e.g., requiring the development of periodic workplans with relevant brush management goals, and submittal of these workplans to Fire-Rescue) for Fire-Rescue to proactively monitor City-owned land for compliance with brush management regulations, evaluate the work performed, and provide a publicly-available report of the outcomes to City Council and the Chief Operating Officer.

(Priority #1)

Management Response: Agree [See full response beginning on page 36.]

Target Implementation Date: Fiscal Year 2025 (contingent upon resource allocation)

Recommendation 1.2

The Fire-Rescue Department (Fire-Rescue) should conduct a resource analysis to determine whether it needs additional resources to proactively monitor City-owned lands for compliance with defensible space regulations. Once the analysis is completed, Fire-Rescue should present it to appropriate Council bodies, such as the Public Safety Committee, and make a commensurate request for additional resources during the City's budget process.

(Priority #2)

Management Response: Agree [See full response beginning on page 37.]

Target Implementation Date: Fiscal Year 2024

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. For the City of San Diego (City), we reviewed brush management practices within the Parks and Recreation Department (Parks and Rec), Transportation Department (Transportation), and the Public Utilities Department (PUD). Collectively, by regulation, these departments are responsible for brush management and fire prevention efforts on approximately 90 percent of City-owned land located in Very High Fire Hazard Severity Zones and within 100 feet of a structure.

The City does not have a process to ensure regular and effective brush management on all required land.

As shown in **Exhibit 7**, we found that the City does not have a process to ensure regular and effective brush management on all required land, and of the major departments 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.

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.

The City's Municipal Code requires the City to conduct brush management on some public lands to reduce wildfire risk.

In Very High Fire Hazard Severity Zones, California State law requires defensible space of 100 feet from each side of a structure, but not beyond the property line; however, the City's Municipal Code is stricter, as in some cases it requires the City to perform brush management on City-owned land to provide defensible space past property lines.⁷ 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.⁸

Parks and Rec's Open Space Division has a program to ensure it conducts regular and effective brush management on most of the required areas.

We found that the Parks and Rec Open Space Division (Open Space) has a brush management program that is generally operating regularly and effectively on open space land. The program includes:

- Regularly performing brush management on high fire risk areas throughout the City every 2 years;
- Providing trainings for staff and contractors;
- Utilizing staff and on-site biologists to provide guidance to field crews to clear brush while navigating environmental sensitivity issues, such as native and endangered wildlife; and
- Monitoring effectiveness of vendor performance of brush management work.

The Open Space Division's brush management program has a goal and a process established to ensure it regularly performs brush management on required land under its purview.

The Open Space Division's brush management program has a goal and a process established to ensure it regularly performs brush management on required land under its purview. We found that since 2019, on average, the Open Space Division met its goal of performing brush management on required land on a 2-year rotational basis. To ensure this, Open Space uses workplans that document work schedules, including when brush management was performed and when it plans to perform brush management in different areas.

Additionally, because training is crucial to ensure that field crews are provided with ecological and technical knowledge for performing

⁷ California Government Code 51175-51189.

⁸ The City provides brush management on City-owned land adjacent to private land where structures received City approval on a tentative map prior to November 15, 1989. For structures that received approval on or after November 15, 1989, defensible space requirements are addressed through a site-specific plan.

Open Space has developed trainings to ensure field crews carry out brush management effectively.

effective brush management, Open Space has developed trainings to ensure field crews carry out brush management effectively. The Open Space Division brush management program requires field crews (both City staff and contractors) to attend initial and on-going trainings regarding proper brush management activities. These trainings include topics such as:

- Identifying the location of the brush zones;
- Thinning and pruning of native and non-native trees and shrubs; and
- Prioritizing vegetation for thinning and/or pruning.

Further, Open Space's training on thinning and pruning of native and non-native trees and shrubs aligns with the City's brush management regulations, which include requirements on the precise manner in which vegetation is cleared and how much vegetation should be cleared. **Exhibit 8** below shows some of the information on thinning and pruning that Open Space provides in its training materials.

Exhibit 8

The Open Space Division's Brush Management Trainings Include Guidance on How to Achieve Good Pruning and Effective Brush Management



Source: Parks and Rec Open Space Division brush management training materials.

Additionally, to ensure effective brush management, the Open Space brush management program utilizes biologists to help staff navigate sensitive plant and animal species when performing brush management. According to Parks and Rec, some of the City's lands have a wide range of vegetation communities, including rare, endangered, or threatened plant and animal species. For this reason, it is crucial for the City to take special considerations before performing brush management on these lands. To account for this, Open Space's

on-site biologists oversee crews and provide expert guidance on environmental sensitivity issues, such as navigating native and endangered wildlife before, during, and after brush management efforts. For example, biologists conduct pre-thinning surveys, such as nesting bird and rare plant surveys, to determine whether brush management work can occur and to assert the presence or absence of rare plant species and bird species for special consideration. Additionally, biologists use pre-thinning surveys to flag vegetation to inform field crews of what should be removed or sensitive resources (e.g., wetlands, plants, etc.) that should be avoided. **Exhibit 9** below shows flagged vegetation for field crews to remove.

Exhibit 9

Biologists Attach Red Flags to Non-Native Plant Species to Inform Field Crews That the Vegetation Must Be Removed



Source: Auditor picture taken during a site visit to one of Parks and Rec Open Space Division's brush management work areas.

In addition to conducting pre-thinning surveys and providing on-site guidance to field crews during their work, Open Space staff also conduct post-work inspections to monitor and assess brush management work. For example, biologists inspect work areas after brush management to ensure completion. Open Space also conducts quarterly evaluations for its contractors to measure work performance, in accordance with the City's contract guide. Specifically, in early fiscal year 2023, Open Space began conducting quarterly contractor evaluations to ensure contract work is being performed effectively. Open Space also reviews the contractor's brush management work schedule, GPS work data, and invoice data to evaluate contractor performance.

Transportation and PUD's brush management efforts are primarily reactive and generally have less systematic processes to ensure proactive regular brush management on land within their purview.

Our audit work predominantly focused on reviewing the Parks and Rec Open Space brush management program since it was a known program involving large acreages. However, we also performed some review of brush management operations within Transportation and PUD as these are additional departments with sizable acreages of City-owned lands.

Transportation conducts brush management reactively in response to service requests and fire referrals.

Unlike Parks and Rec, Transportation does not have work plans to ensure it performs brush management on all required land it manages. Rather than taking a proactive brush management approach, Transportation conducts brush management reactively in response to service requests and fire referrals. Although Transportation noted that it has made improvements to its brush management efforts to reduce the number of fire complaints it receives, land within Transportation's brush management purview likely has gone unaddressed.

Similarly, PUD does not have a proactive process to ensure it regularly performs brush management on required land. According to PUD, the department began performing brush management and weed abatement in 2018 after staff expressed the need for brush to be cleared and PUD allocated funding to carry out these efforts. PUD further noted that it is not currently aware of funding limitations to complete brush management. However, there is a need to identify and obtain the necessary resources to develop a brush management program within the department.

PUD has primarily focused on performing brush management on land where it typically receives fire complaints.

PUD noted that it has thus primarily focused on performing brush management on land where it typically receives fire complaints. For example, PUD noted that it has focused recent brush management efforts in the Del Dios community. As a result, the community now requires relatively minor brush management work. However, this approach leaves other land that requires brush management unaddressed. In fact, as shown in **Exhibit 10**, in December 2022, we observed overgrown brush during a site visit at a PUD-managed site. In March 2023, PUD noted that the site was undergoing brush management efforts.

*Exhibit 10***A Reactive Brush Management Approach Leaves Overgrown Areas Unmanaged**

Source: Auditor picture taken during a site visit to one of PUD's brush management work areas.

As mentioned above, many of the City's lands have rare, endangered, or threatened plant and animal species for which staff need to take special considerations when performing brush management. Although Transportation and PUD noted that staff is knowledgeable in navigating sensitive plant and animal species and accompany field crews during brush management efforts to provide guidance, staff is also performing other duties, which may limit their availability to provide field guidance. By incorporating biologists' expertise into Transportation's and PUD's brush management efforts, both departments could ensure the effectiveness of their brush management efforts.

Transportation can help ensure the effectiveness of contractor brush management work by regularly evaluating contractor performance.

Transportation can take steps to ensure the effectiveness of contractor brush management work. Although the City's contract guide requires departments to conduct contractor evaluations on a quarterly basis and provide the evaluations to the Purchasing and Contracting Department, Transportation has not completed contractor evaluations. Since Transportation uses the same contractor as Parks and Rec, it is not required to complete separate contractor evaluations; however, according to the Purchasing and Contracting Department,

Transportation can provide input on the contractor's performance to Parks and Rec.

In contrast to Parks and Rec and Transportation, PUD's contract with its brush management vendors requires PUD to complete contractor evaluations as often as necessary throughout the term of the contract. According to PUD, it noted that it has not identified deficiencies in its contractor's work that warrants a formal evaluation. While our review involved Parks and Rec, Transportation, and PUD, it is possible that these issues are also present in other departments with brush management responsibilities.

Departments' siloed approach to performing brush management results in irregular and inefficient brush management, which increases wildfire risk.

The Open Space Division only performs brush management up to the boundaries of its areas of responsibility and leaves paper streets unaddressed.

City departments have adopted a siloed approach for carrying out brush management efforts as they focus on performing brush management on the lands under their direct responsibility. According to the City's GIS data, we estimate there are 83 acres of land managed by Transportation which also require brush management—primarily paper streets⁹—adjacent to the Open Space Division's brush management land. However, the Open Space Division only performs brush management up to the boundaries of its areas of responsibility and leaves these paper streets unaddressed. This approach results in irregular and ineffective brush management as some areas remain unaddressed and require field crews to return to perform brush management. **Exhibit 11** shows a canyon where land is managed by the Open Space Division and Transportation; however, as the Open Space Division does not perform brush management on other department-managed land, this land is cleared in a patchwork-like manner.

⁹ The term paper street refers to a road or alley that exists only on paper (such as a map or other similar documents) and has not been accepted into the City's street system.

Exhibit 11

In Some Areas of the City, the Open Space Division and Transportation Manage Adjacent Lands Requiring Brush Management



Source: OCA generated based on the City's GIS data.

Departments conduct brush management independently and in a siloed manner.

As noted in Finding 1, because the Fire-Rescue Department does not play an active role in ensuring comprehensive Citywide brush management efforts across the many departments with brush management responsibilities, departments conduct brush management independently and in a siloed manner. Without proper departmental coordination, it is likely that this uncoordinated approach extends to other areas of the City where other departments manage adjacent land.

Further, while the Parks and Rec Open Space Division has a program to ensure regular and effective brush management, other Parks and Rec divisions, such as Community Parks I and II, complete brush management less systematically. According to Parks and Rec, Community Parks I and II Divisions' grounds maintenance staff and contractors perform weed and dead brush removal on both a recurring and as-needed basis on community and neighborhood park locations. Although Parks and Rec noted that while these activities result in fuel load reductions, they are not necessarily the same as brush management activities as defined in the City's Municipal Code.

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.

“Defensible space affects everyone, so one weak link in the chain will create a domino effect.”

— Alpine Fire Protection District Fire Marshal

Better coordination can help the City prevent “weak links,” which increase wildfire risk Citywide. According to the Alpine Fire District Marshal, “Defensible space affects everyone, so one weak link in the chain will create a domino effect.”¹⁰

The current siloed approach also leads to operational inefficiencies. For example, many paper streets exist in areas adjacent to Open Space that contain dense vegetation which require more time, labor, and resources for effective management compared to land that is regularly maintained.

Additionally, as noted by the Open Space Division, a common concern from residents is that departments do not coordinate their work within the same areas. As a result, staff may spend time addressing complaints that could have been preventable had a more coordinated approach been utilized.

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.

To ensure regular and effective brush management on all required City-owned land, it is crucial for City departments to coordinate work and leverage resources amongst each other. A regular periodic forum for departments to discuss and coordinate brush management efforts is one such mechanism. Because Open Space Division has a robust brush management program, the City is missing out on an opportunity to leverage Open Space Division’s resources to strengthen Citywide brush management efforts. In fact, PUD and Open Space Division acknowledged the benefits of cross-departmental coordination efforts, and in April 2023, cited several examples of increasing collaboration with each other, such as exchanging training materials.

Additionally, the City has established mechanisms, such as Service Level Agreements and Internal Orders, to help departments achieve

¹⁰ As reported by CBS8, June 2023. Available at: <https://www.cbs8.com/article/news/local/zone-zero-critical-for-defensible-space-in-saving-your-home/509-5b549d53-be5e-4a07-913f-d9e765bf77>

By implementing mechanisms such as a Service Level Agreement to allow the Open Space Division to perform brush management on other adjacent department-managed lands, the City can ensure that required City-owned land is regularly and effectively brush managed.

Citywide goals by enabling departments to provide services for one another and for the associated costs to be transferred between departments for these services. However, departments with brush management responsibilities have not taken advantage of these mechanisms to perform brush management on other department-managed lands and instead focus on performing brush management on the lands under their direct responsibility.

For example, the Open Space Division noted that its brush management program is funded on a per-acre basis, and thus, does not perform brush management past its boundary, such as on land managed by Transportation and PUD. While this approach to funding and resource management has helped enable the Open Space Division to carry out regular and effective brush management on land within its purview, other departments with brush management responsibilities do not have dedicated programs and staff for carrying out brush management efforts.

The Open Space Division expressed its willingness to incorporate other City-owned lands in its brush management program. However, it emphasized that additional staffing resources would be needed to maintain these additional brush management efforts as well as to conduct start-up work as lands with unaddressed brush management will initially require more time, labor, and resources to manage. By implementing mechanisms such as a Service Level Agreement to allow the Open Space Division to perform brush management on other adjacent department-managed lands, the City can ensure that required City-owned land is regularly and effectively brush managed.

Investing in proactive brush management could result in increased safety and financial savings by preventing costly wildfires.

Funding to ensure regular and effective brush management on City-owned land can reduce negative impacts of wildfires, particularly when they become disasters. The Cedar Fire in 2003 destroyed more than 2,000 structures and resulted in 15 lives lost; in the City, 335 structures were destroyed. The 2007 Witch Creek Fire also destroyed 1,650 structures and claimed 2 lives; in the City, 365 structures were destroyed. Furthermore, the City's expenses on brush management are very small compared to the costs of a severe fire. From FY2019 through FY2023, Open Space's annual budget for brush management has averaged approximately \$4.7 million. By comparison, estimates of the property damage from the 2007 Witch Creek Fire alone was over a

billion dollars, which would be more than 200 times greater than Parks and Rec's annual Open Space Division brush management budget.

Recommendations

To ensure that the City performs regular and effective brush management on high fire risk City-owned lands, we recommend:

Recommendation 2.1

The Chief Operating Officer should direct the Parks and Recreation Department Open Space Division to incorporate paper streets which require brush management, and that are within or adjacent to land managed by the Open Space Division, into its brush management schedule and program. A Service Level Agreement, Internal Order, or similar reimbursement mechanism should be established if/as appropriate.

(Priority #1)

Management Response: Agree [See full response beginning on page 37.]

Target Implementation Date: Fiscal Year 2025 (contingent upon resource allocation)

Recommendation 2.2

To ensure consistent and effective brush management across all City-owned land, the Chief Operating Officer should consider consolidating brush management responsibilities to the extent operationally and fiscally possible. OCA believes that the Parks and Recreation Department's Open Space Division is best positioned to expand its operations to achieve mandated brush management objectives. However, our assessment does not preclude other approaches that achieve the same objectives. A Service Level Agreement, Internal Order, or similar reimbursement mechanism should be established if/as appropriate.

(Priority #2)

Management Response: Agree [See full response beginning on page 38.]

Target Implementation Date: May 2024

Recommendation 2.3

Departments with significant brush management responsibilities, such as, but not limited to, the Parks and Recreation Department, Transportation Department, Public Utilities Department, and Fire-Rescue Department, should establish regular periodic meetings to help facilitate and coordinate brush management work and resources.

(Priority #3)

Management Response: Agree [See full response beginning on page 38.]

Target Implementation Date: Fiscal Year 2025 (contingent upon resource allocation); February 2024 for initial regular meetings

Recommendation 2.4

To monitor the effectiveness of contractors' brush management work, the Parks and Recreation Department (Parks and Rec) should:

- a. Obtain input from other departments who also use Parks and Rec's contractors to perform brush management, such as the Transportation Department; and
- b. Continue to conduct quarterly performance evaluations and submit these forms to the Purchasing and Contracting Department for monitoring.

(Priority #2)

Management Response: Agree [See full response beginning on page 38.]

Target Implementation Date: Fiscal Year 2024

Recommendation 2.5

The Parks and Recreation Department (Parks and Rec) should conduct a resource analysis to determine whether it needs additional resources to perform brush management activities on paper streets and potentially other lands managed by other departments. Once the resource analysis is completed, Parks and Rec should present it to the appropriate Council bodies, such as the Public Safety Committee, and make a commensurate request for additional resources during the City's budget process.

(Priority #2)

Management Response: Agree [See full response beginning on page 38.]

Target Implementation Date: Fiscal Year 2024

Appendix A

Definition of Audit Recommendation Priorities

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

Objective

In accordance with the Office of the City Auditor's approved Fiscal Year 2023 Audit Work Plan, we conducted a performance audit of the City of San Diego's (City) brush management and fire prevention efforts on City-owned land. Our audit objective was to determine whether the City conducts regular and effective brush management on City-owned lands within high wildfire risk zones.

Scope

The scope of this audit was brush management performed on City-owned land from FY2019 through FY2023. The scope did not include brush management on private properties.

Methodology

The following points explain the methodology we used to address our objective:

- Interviewed staff in the Fire-Rescue Department, Public Utilities Department, Transportation Department, Department of Real Estate and Airport Management, Purchasing & Contracting Department, Risk Management Department, and Independent Budget Analyst's Office.
- Conducted site visits at Public Utilities Department and Parks and Recreation Open Space Division brush management sites.
- Reviewed GIS data of City-owned land, building outlines, Very High Fire Hazard Severity Zones, brush management zones, and paper streets.
- Verified brush management work conducted on City-owned land through GoogleMaps.
- Reviewed internal documents, including contracts, contractor evaluations, training materials, and inspection reports related to brush management.
- Participated in ride-alongs with the Fire-Rescue Department to observe brush management inspections.
- Reviewed previous City audit, analyses, and reports related to brush management and fire prevention.

- Reviewed State and local maps and codes pertaining to defensible space, brush management, and high fire risk areas.
- Benchmarked the City's brush management program against the City of Santa Barbara and City of Oakland.
- Reviewed California cities' public documents pertaining to brush management.

Data Reliability

We primarily worked with several data sets: City of San Diego Fire Hazard Severity Zone map layer, City-Owned Land map layer, and the Open Space Paper Streets map layer. We interviewed Fire-Rescue, Department of IT, and Parks Rec to discuss controls to ensure that the data in the GIS map layers was reliable. Additionally, we judgmentally reviewed 11 open space brush management work areas and Parks and Rec Open Space Division's brush management work schedules to determine whether the Open Space Division performed brush management according to its schedule.

Because the City does not have a comprehensive dataset or information on the number of acres of City-owned lands subject to brush management regulations, we present figures as estimates, and note limitations, caveats, and notes under relevant exhibits accordingly. Despite these data limitations, we determined that the data were 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 objective, described above. We tested the following controls:

- Reliability of the City's Very High Fire Hazard Severity Zone map layer;
- Accuracy of the Parks and Recreation Open Space Division brush management work;
- Oversight and monitoring of City-owned land for compliance with brush management codes and regulations;
- Departments' compliance with contractor evaluations; and
- Compliance with laws and regulations pertaining to brush management.

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: July 13, 2023

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

FROM: Eric Dargan, Chief Operating Officer

SUBJECT: Management Response to the Office of the City Auditor’s Performance Audit of Brush Management on City-Owned Land

This memorandum serves as the management response to the Performance Audit of Brush Management on City-Owned Land (Performance Audit.) At the time this response was written, the draft Performance Audit provided to management contained two findings and seven recommendations directed to multiple departments including, but not limited to: the Chief Operating Officer, Parks and Recreation, Public Utilities, San Diego Fire-Rescue, and the Transportation Department.

Department staff have been working on improvements to brush management-related initiatives prior to this audit, including working to put needed department resources in place. For instance, departments affected by brush management have had some meetings to discuss best practices (part of Performance Audit Recommendation 2.3 below), and the Fire-Rescue Department has been pursuing grant opportunities to help support brush management work. Fire-Rescue Department staff have also been working with other City departments to create and refine maps, and Fire-Rescue management supported the creation of a new job classification, the Wildfire Mitigation Specialist series. This new job classification was recently approved by the Civil Service Commission and can be used by all City departments to oversee brush management of City- and privately-owned land.

Department staff and management appreciate the Performance Audit prepared by the Office of the City Auditor and thank the staff involved. Management agrees with all recommendations within the Performance Audit.

RECOMMENDATION 1.1: To improve accountability for brush management on City-owned land, the Chief Operating Officer should adopt and implement an Administrative Regulation that:

- a) Requires the Fire-Rescue Department (Fire-Rescue) to identify and maintain information on the location of lands managed by City departments subject to brush management regulations, and to distribute this information to the relevant City departments; and,

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July 13, 2023

- b) Establishes policies and procedures (e.g., requiring the development of periodic workplans with relevant brush management goals, and submittal of these workplans to Fire-Rescue) for Fire-Rescue to proactively monitor City-owned land for compliance with brush management regulations, evaluate the work performed, and provide a publicly-available report of the outcomes to City Council and the Chief Operating Officer. (Priority 1)

Management Response: Agree, contingent upon the availability of resources. Fire-Rescue has already been working towards developing an annual Community Risk Assessment Report and has begun collaborating with other City departments to do the work outlined in recommendation 1.1.a. To fulfill all parts of this recommendation, however, the department has preliminarily identified the following staffing needs:

1. 1.00 Program Manager position to lead the Community Risk Assessment Report work that includes oversight of staff and establishing the needed policies, procedures, work plans, and a report of outcomes;
2. Addition of new job classification positions: 10.00 Wildland Mitigation Specialists (1.00 Supervisor and 9.00 Specialists); and,
3. 1.00 Information Systems Analyst 3 position, and 1.00 clerical staff support position.

Target Implementation Date: Fiscal Year 2025, contingent upon resource allocation.

RECOMMENDATION 1.2: Fire-Rescue should conduct a resource analyst to determine whether it needs additional resources to proactively monitor City-owned lands for compliance with defensible space regulations. Once the analysis is completed, Fire-Rescue should present it to appropriate Council bodies, such as the Public Safety Committee, and make a commensurate request for additional resources during the City's budget process. (Priority 2)

Management Response: Agree. Fire-Rescue will refine the resource needs listed in Recommendation 1.1, and will target the Fiscal Year 2025 budget process for any resource requests.

Target Implementation Date: Fiscal Year 2024

RECOMMENDATION 2.1: The Chief Operating Officer should direct the Parks and Recreation Department Open Space Division to incorporate paper streets which require brush management, and that are within or adjacent to land managed by the Open Space Division, into its brush management schedule and program. A Service Level Agreement, Internal Order, or similar reimbursement mechanism should be established if/as appropriate. (Priority 1)

Management Response: Agree, contingent upon a review and implementation of resource needs for Parks and Recreation Department. Minimally, Open Space Division would need additional staffing (such as a Biologist 3 and Associate Planner positions) and contract resources. Parks and Recreation will do a larger resource analysis prior to requesting any additional resources through the City's annual budget process.

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Target Implementation Date: Fiscal Year 2025, contingent upon resource allocation.

RECOMMENDATION 2.2: To ensure consistent and effective brush management across all City-owned land, the COO should consider consolidating brush management responsibilities to the extent operationally and fiscally possible. OCA believes that the Parks and Recreation Department's OSD is best positioned to expand its operations to achieve mandated brush management objectives. However, our assessment does not preclude other approaches that achieve the same objectives. A Service Level Agreement, Internal Order, or similar reimbursement mechanism should be established if/as appropriate. (Priority 2)

Management Response: Agree, management will consider consolidating brush management activities, and if there is a move to consolidation this will be reflected in the Fiscal Year 2025 budget.

Target Implementation Date: May 2024

RECOMMENDATION 2.3: Departments with significant brush management responsibilities, such as, but not limited to, the Parks and Recreation Department, Transportation Department, Public Utilities Department, and Fire-Rescue Department, should establish regular periodic meetings to help facilitate and coordinate brush management work and resources. (Priority 3)

Management Response: Agree. Management notes that while some department conversations have already begun, the recommendation cannot be fully implemented without additional resources being assessed and allocated, including those for Fire-Rescue as outlined in Recommendations 1.1 and 1.2.

Target Implementation Date: Fiscal Year 2025, contingent upon resource allocation, although initial regular meetings will have a target implementation date of February 2024.

RECOMMENDATION 2.4: To monitor the effectiveness of contractors' brush management work, the Parks and Recreation Department should:

- a) Obtain input from other departments who also use Parks and Recreation's contractors to perform brush management, such as the Transportation Department; and,
- b) Continue to conduct quarterly performance evaluations and submit these forms to the Purchasing and Contracting Department for monitoring. (Priority 2)

Management Response: Agree. Parks and Recreation will receive input from other departments on the effectiveness of contractors' compliance with the brush management contract and submit to the Purchasing & Contracting Department.

Target Implementation Date: Fiscal Year 2024

RECOMMENDATION 2.5: The Parks and Recreation Department should conduct a resource analysis to determine whether it needs additional resources to perform brush management activities on paper streets and potentially other lands managed by other departments. Once the resource analysis is completed, Parks and Recreation should present it to the appropriate Council bodies, such as the Public Safety Committee, and make a commensurate request for additional resources during the City's budget process. (Priority 2)

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Management Response: Agree. Parks and Recreation will do a resource analysis and will target the Fiscal Year 2025 budget process for any resource requests.

Target Implementation Date: Fiscal Year 2024

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

Thank you,



Eric Dargan
Chief Operating Officer

ED/cmg

cc: Paola Avila, Chief of Staff, Office of the Mayor
Kris McFadden, Deputy Chief Operating Officer
Kristina Peralta, Deputy Chief Operating Officer
Matthew Vespi, Chief Financial Officer
David Nisleit, Chief, Police Department
Colin Stowell, Chief, Fire-Rescue Department
Jessica Lawrence, Director of Policy, Office of the Mayor
Charles Modica, Independent Budget Analyst
Christiana Gauger, Chief Compliance Officer, Compliance Department
Andy Field, Director, Parks and Recreation Department
Juan Guerreiro, Director, Public Utilities Department
Bethany Bezak, Director, Transportation Director
Lisa Celaya, Executive Assistant Director, Public Utilities Department
Luis Briseño, Program Manager, Compliance Department



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