



COUNTY OF YOLO

Board of Supervisors

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June 23, 2026

Honorable Catherine A. Rayhill
Superior Court of California, County of Yolo
1000 Main Street
Woodland, CA 95695

Yolo County Grand Jury
P.O. Box 2142
Woodland, CA 95776

Re: Response to Civil Grand Jury Report on the Oakdale Fire

On behalf of the Yolo County Board of Supervisors (the “Board”) and the three County department heads invited to respond—the County Administrative Officer, the County Counsel, and the Director of Community Services—this document responds to the Civil Grand Jury (the “Grand Jury”) report regarding the Oakdale Fire near Esparto (the “Report”). The Board and the three department heads are collectively the “County respondents,” with each referenced individually as needed; general references to “the County” are to the County organization as a whole. In preparing this response, the County respondents relied on the public record and, in limited instances, on information provided by County staff with direct knowledge of the relevant facts and circumstances.

The Board offers the following general comments as an introduction to the more specific responses in the attachments.

The Oakdale Fire was a profound tragedy for the families and loved ones of the seven people who were killed that day, and it has forever affected the wider Esparto and Yolo County communities. The victims’ families, and the public, deserve a full and accurate account of how an illegal fireworks operation grew, remained concealed, and ultimately ended in catastrophe.

Any such account must be grounded in a complete record and supported by the evidence. The Grand Jury set out to provide such an account. It did not. As the governing body charged with responding to the Report, the Board has a duty to state clearly where the Report’s conclusions exceed the evidence. It therefore cannot accept conclusions drawn from an incomplete record, particularly conclusions about the knowledge, conduct, and motives of County staff and the Board that are not supported by the evidence.

The central problem is that the Grand Jury completed its Report before critical facts became available. On April 3, 2026, after the Report was finished, the Yolo County District Attorney charged the operators of the fireworks businesses with felonies, including murder, in *People v. Chee, et al.* The indictments allege a years-long criminal enterprise built and maintained through deception, including fraudulent federal licensing arrangements, fabricated leases, false statements about how buildings and property would be used, and repeated assurances to federal, state, and local officials that the operation was lawful.

As alleged in the indictments, the enterprise was designed to deceive the agencies and officials that came into contact with it, and a disregard for human life pervaded its operations and created the conditions that produced the Oakdale Fire. These allegations remain to be proven in court. They nonetheless provide critical context that the Grand Jury did not have, and materially undermine the Report's central claim that County staff knew the true nature of the operation and chose not to act following a site visit on June 2, 2022.

The evidence described in the Report does not support this claim. The title declares that officials "knew" and that "none acted," assigning blame before the analysis begins. Yet the Report later acknowledges that the Grand Jury "could not determine definitively" why County staff did not pursue matters at the Esparto property further in 2022. (Report at p. 15.) Despite that admission, the Report adopts the most severe possible explanation. It claims the Board fostered a "culture of tolerance" and suggests staff "turn[ed] a blind eye" because the property owners worked for the Sheriff's Office. (Report at p. 18.) The Report itself presents these claims as possible explanations based on inferences from witness testimony and states only that the conduct it describes "seems to have" contributed. The Board will not accept findings about the motives of County staff or the Board that rest on speculation.

The Report also gives insufficient weight to the distinct responsibilities of local, state, and federal agencies. The State Fire Marshal licenses commercial fireworks operators and has state authority to inspect regulated operations and suspend or revoke state licenses. The federal Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF") regulates explosives under federal law. The County does not issue state fireworks licenses or federal explosives licenses. It approved no fireworks activity at the Esparto property and received no notice when state or federal licenses connected to that property were issued or renewed.

When County staff visited the property on June 2, 2022, they were there to inspect a new agricultural storage building that the owner had represented, under penalty of perjury, would be used to store farm equipment. The owner did not disclose that the building would be used to store or handle explosives or other hazardous materials. In fact, the owner represented in writing that it would not be used for such purposes. Consistent with these representations, County staff did not observe fireworks or hazardous materials inside the storage building, which was nearly empty.

The criminal indictments allege that these representations to County staff were part of a broader pattern of deception. They also describe how the operators allegedly continued to mislead state and federal regulators for three years after the County staff visit so they could maintain their licenses and expand the enterprise. One license renewal was issued only weeks before the explosion, even after state investigators had seized roughly 500,000 pounds of the enterprise's product, including illegal explosives, in Southern California. As alleged, the scheme deceived agencies at every level of government, including the County.

The Report nonetheless focuses its harshest criticism on the County, which had no fireworks licensing role, received no notice of state or federal licensing actions, and had far less information than the agencies charged with regulating fireworks and explosives. Before the Oakdale Fire, the Board had no information about the fireworks operation or about County staff's limited involvement with the Esparto site. The Report does not explain how the Board could have knowingly tolerated an operation of which it was unaware.

The Grand Jury was candid about the limits of its review. It stated that it was "cautious about the scope of its own investigation" and that Civil Grand Jury inquiries are generally "confined by law to the administrative

functions of local government.” (Report at p. 18.) Those limits are significant. The Grand Jury completed its work without the facts later made public in the criminal indictments and without a full examination of the actions and information available to the State Fire Marshal and ATF. A review conducted within such a narrow scope cannot fairly support the sweeping conclusions it draws about County staff and the Board.

In the attachments, the Board and the other County respondents address every finding and recommendation as required by Penal Code section 933.05. Where the Report identifies practical ways to strengthen County programs, procedures, training, coordination, and oversight, the Board and the other respondents agree and are already taking action. Where the Report substitutes speculation for evidence, particularly in its conclusions about the knowledge, conduct, and motives of County staff and the Board, the respondents reject those conclusions and explain why.

The Board will not allow legitimate questions about administrative procedures to be transformed into a claim that County staff or the Board bear causal responsibility for this tragedy. The Oakdale Fire arose from an illegal and deliberately concealed enterprise. Responsibility for the deaths of the seven workers must be placed where the evidence supports it. As alleged in the pending criminal proceedings, that responsibility rests with the enterprise and the people who built it, concealed it, expanded it, and continued operating it until their conduct culminated in catastrophe.

ATTACHMENTS

- A. Response to Findings
- B. Response to Recommendations

ATTACHMENT A. RESPONSE TO FINDINGS

I. FINDINGS DIRECTED TO THE COUNTY GENERALLY (FINDINGS F1-F2)

The Report does not direct a response to its findings, but Penal Code section 933.05 obligates “the responding person or entity” to respond to findings in a Grand Jury report. The following responses to Findings F1-F2 are provided on behalf of the County generally, as the Report does not direct those findings specifically to the Board or any of the three County department heads.

Finding F1. Illegal fireworks businesses operated in Yolo County in violation of County ordinances for many years.

Response. The County agrees with this finding.

The County has prohibited the storage of dangerous fireworks and related activities in the unincorporated area since 2001. As the Report accurately notes, “Devastating Pyrotechnics obtained permits from State and Federal agencies to operate, although no local use permit or business license was ever obtained.” (Report at p. 11.) The County received no notice from ATF or the State Fire Marshal of the issuance or renewal of the approvals granted by those agencies. The County issued no local approval for fireworks activities at the site.

Finding F2. Enforcement of those ordinances would have prevented death and destruction from the Esparto fireworks explosion.

Response. The County disagrees with this finding.

This finding improperly shifts accountability for the Oakdale Fire from the seven defendants indicted and charged with over two dozen criminal counts, including murder, to County staff that did not observe and could not reasonably foresee anything resembling the extensive, dangerous enterprise that ultimately developed on the site.

As essential context, public records released by the County on August 28, 2025 establish the following facts:

1. The Chief Building Official and a building inspector visited the site on June 2, 2022. That visit was conducted in connection with an electrical meter release inspection for a new metal storage building that the landowner represented to the County, under penalty of perjury, would be used for agricultural purposes only, including farm equipment storage, and would not be a place of employment or used for the storage or handling of any hazardous or flammable materials.¹
2. During the visit, County staff observed the metal storage building under inspection, which was nearly empty, and a row of approximately 25 Conex storage containers near the developed area of the property. Staff also observed a 200-amp service panel, a rated capacity that exceeds the limit permitted for structures qualifying under the County’s building permit exemption for certain agricultural structures.

¹ False statements about the building’s intended purpose are now included as part of Counts 8 and 13 in the main indictment.

3. Consistent with a “tip” the Chief Building Official received shortly before his visit, a property occupant represented that the 25 storage containers were used in connection with municipal fireworks displays and were currently empty.
4. Shortly thereafter, the Esparto Fire Protection District Chief² advised the Chief Building Official that the pyrotechnic business:
 - a. Was federally licensed through the ATF;
 - b. That the row of approximately 25 containers observed during the meter release inspection contained “safe and sane” fireworks and functioned as a distribution center; and
 - c. That “more dangerous materials” were stored in separate, smaller groups of containers that, in the Fire Chief’s assessment, “appear to meet fire separation requirements.” The Chief Building Official noted the need to independently verify that the containers met separation requirements.
 - d. Performed fireworks repackaging and processing “outdoors to simplify the regulations they need to meet for their ATF license.”
5. On June 3, 2022, the building inspector sent the landowners’ authorized agent a “Notice of Corrections” listing issues to be addressed with the metal storage building, including the need for a building permit due to the 200-amp service panel. The landowners’ agent applied for a building permit and completed related paperwork between June 9, 2022 and August 26, 2022, representing in writing that the structure would be used for “agricultural equipment storage” and that hazardous materials, including flammable materials, would not be stored or handled inside.

As the Report observes, aside from internal staff-level discussions, County staff did not take any further action to investigate fireworks activities at the Esparto site or determine to pursue enforcement efforts.³ The Grand Jury acknowledges that it “could not determine definitively” why those actions did not occur. (Report at p. 15.) Having made that concession, the Report nonetheless attributes the absence of further action to a “culture of tolerance” and to the involvement of property owners employed by the Sheriff’s Office, rather than to the unremarkable conditions that staff actually observed during their visit.

This claim relies on a single internal email in which the Chief Building Official advised a manager, just before his June 2, 2022 visit, that he would “tread lightly today” because the site was reportedly connected to “deputies that we work with.” Read in full, the email does not show or even suggest that County staff extended favorable treatment to the operation. The email explains that the purpose of the visit was to “gather more information and verify the reports,” and that staff would

² The main indictment include various criminal counts indicating that the Fire Chief was also actively deceived by the principals of the businesses (e.g., Counts 8, 10, and 13).

³ Cities and counties generally have no duty to enforce local ordinances, including zoning codes, or to abate or take other action with regard to nuisances under California Health and Safety Code § 17980 and related authorities. *Haggis v. City of Los Angeles* (2000) 22 Cal.4th 490, 498; *Sutherland v. City of Fort Bragg* (2000) 86 Cal. App. 4th 13, 18-19; *Fox v. County of Fresno* (1985) 170 Cal. App. 3d 1238, 1242.

thereafter “discuss how to proceed”—language describing measured conduct on an initial, information-gathering visit, not a decision to extend favorable treatment or to forgo enforcement. The events that immediately followed, including a number of emails, are consistent with that reading: the Chief Building Official documented the violations he observed, required additional permitting for the metal storage building, and discussed potential follow-up actions, and nothing indicates that he gave any weight to (or even further considered) the fact that the landowners were employed by the Sheriff’s Office.

These actions refute the Grand Jury’s suggestion of an intention to shield the operation or the landowners. The more ordinary explanation is the more likely one. Nothing staff encountered—the empty new building, the nearby storage containers represented to be empty, the absence of any visible hazardous materials—presented an obvious, immediate hazard. The metal storage building under construction was represented by the landowners, under penalty of perjury, as a place to store farm equipment only, with an almond orchard under their ownership nearby. The local Fire Chief advised that activities elsewhere at the site included storage of “safe and sane” fireworks and that more hazardous materials, which were regulated by the ATF, were stored separately and appeared to meet fire-separation requirements.

Altogether, nothing staff encountered presented an obvious, immediate hazard; the matter was treated as routine, was not assigned a high priority, and was not later revived for further investigation. In no way, however, can the absence of follow-up be equated with responsibility for the Oakdale Fire. The County rejects this finding on that basis. There are several specific reasons for this position.

First, as explained above, the vast quantities of illegal explosives and dangerous onsite conditions that caused the July 1, 2025 explosion were not apparent at the site during the Chief Building Official’s June 2, 2022 visit to perform a meter release. Enforcement directed at the conditions that County staff understood to exist in June 2022 would have been directed at different, much less dangerous concerns than the conditions that caused the Oakdale Fire three years later. County staff cannot reasonably be blamed for failing to foresee that these conditions—chiefly, storage containers that the local Fire Chief believed were used for “safe and sane” fireworks and smaller groups of containers that the Fire Chief said were regulated by the ATF—would eventually evolve into conditions that the indictments allege included the storage, handling, and assembly of one million pounds of illegal explosives three years later.

Second, primary regulatory authority over fireworks operations rests with the State Fire Marshal. Under Health & Safety Code §§ 12550, 12552, 12555, and 12590-12591, the State Fire Marshal—not the County—is vested with authority to license, inspect, and shut down pyrotechnic operations statewide. The State Fire Marshal issued and annually renewed Public Display, Wholesaler, and Importer/Exporter licenses to Devastating Pyrotechnics and Blackstar Fireworks at the Esparto address through July 1, 2025, including an Importer/Exporter renewal issued to Devastating Pyrotechnics on May 22, 2025—one day after the State Fire Marshal’s investigators seized approximately 500,000 pounds of that enterprise’s product, including illegal explosives, in the City of Commerce, California. By contrast, the County did not issue any approvals for fireworks operations at the site, and its legal authority over such operations is substantially more limited. As previously stated, the County received no notice from ATF or the State Fire Marshal of the issuance or renewal of these licenses.

Third, the indictments allege that the operators developed and expanded the enterprise through a sustained pattern of misrepresentation that defeated detection at every level of government for many years. The main indictment alleges that the principals obtained federal ATF licenses through front licensees to circumvent the disqualification of the principal operator, submitted a sworn building permit application falsely declaring agricultural-only use, fabricated lease agreements to legitimize the storage arrangement to regulators, and represented operations to local, state, and federal authorities—including ATF, FBI, the State Fire Marshal, and the Esparto Fire Protection District—as properly licensed and lawful. By contrast, County code enforcement operates on observable conditions and information reasonably available through routine inspection, complaint response, and permit review. It is not a criminal investigative function, and it is not equipped to penetrate an organized, multi-party scheme premised on falsified federal licenses, fraudulent permit applications, and other actions and representations that deceived many regulatory authorities into believing that key safety requirements were being met.

Fourth, the Grand Jury's assumption that a County code enforcement letter in 2022 would have caused the principals to cease rather than greatly expand this enterprise is speculative and difficult to reconcile with how the operators are alleged to have responded to actual regulatory pressure. For instance, based on the indictments and related court filings, those now charged with various crimes are alleged to have:

- Continued and expanded operations at the Esparto site after a June 14, 2023 explosion at a San Jose storage facility that was storing explosives linked to Devastating Pyrotechnics;
- Continued and expanded operations through the May 2025 State Fire Marshal seizure of about 500,000 pounds of consumer and commercial fireworks as well as significant quantities of illegal explosives in the City of Commerce;
- Obtained renewed State Fire Marshal licensure through further misrepresentation after that seizure; and
- Actively conspired—after seven of their workers died during the July 1, 2025 explosions and fires—to restart operations in Nevada or other states using different names.

Altogether, in response to every serious accident or run-in with law enforcement, those now charged allegedly continued their illegal and dangerous enterprise undaunted.

The loss of seven lives in the Oakdale Fire is a profound tragedy. The County's disagreement with Finding F2 is not a disagreement with the principle that local enforcement matters, or with the Civil Grand Jury's general conclusion that code enforcement can be enhanced. It is a disagreement with the Civil Grand Jury's speculation that code enforcement action in mid-2022, directed at the very limited conditions then in existence, would have altered the course of this illegal enterprise and prevented the deaths and property damage at Esparto.

II. **FINDINGS DIRECTED TO THE BOARD OF SUPERVISORS (FINDINGS F14-F16)**

Findings F14-F16 are directed at the Board of Supervisors, and the Board therefore responds as required by Penal Code section 933.05. The Board's response relies on the public record or, in limited instances, on information provided by staff with direct knowledge of the facts and circumstances mentioned below.

Finding F14. The Board of Supervisors has encouraged a laissez-faire attitude toward new construction and businesses located in unincorporated areas.

Response: The Board disagrees with this finding.

Code enforcement programs in most California cities and counties rely heavily on education and voluntary compliance, particularly for minor violations, rather than a strict "no tolerance" approach. The same has long been true in Yolo County. But the Board disagrees with the Grand Jury's assertion that it "encouraged a laissez-faire attitude" toward new construction and businesses, particularly to the extent the Grand Jury is suggesting by this finding that the Board endorsed turning a blind eye toward even serious County Code violations. In particular, the Board disagrees with and rejects this finding as applied to the Board's current membership. Further, the Board is not aware of (and the Report fails to describe) any action, vote, resolution, or directive of a prior Board of Supervisors—including the Board as composed in mid-2022—that would provide the evidentiary basis that a finding of this gravity requires.

In the Background section of the Report, the Grand Jury attempts to assess why County staff did not take any additional action (beyond requiring a building permit application) following the June 2, 2022 site visit and related information received at the same time, including information provided by the Chief of the Esparto Fire Protection District. The Report acknowledges that among all County staff interviewed, "no one could recall any further conversations or meetings about the site." (Report at p. 15.) The Report later concludes that the Grand Jury "could not determine definitively" why staff did not take further actions. Yet despite acknowledging the lack of any evidence on this issue, the Report then offers many ideas that reflect its own guesswork. Such as:

- "It is **possible** there **may have been** a reluctance to antagonize some sheriff's officials";
- "**Perhaps**, in the absence of a deliberate decision to take some action, enforcement at this particular property was never conducted"; and
- "Although **no County official could recall** such a decision, Building Division officials **may have** decided that attempting to enforce the County ordinances was too much trouble."

There is no credible basis for such speculation. The Grand Jury appears to have intended this conjecture to provide context for its criticism of the Board. But the testimonial passages most directly relevant to the Grand Jury's critique of the Board of Supervisors are also framed in similar terms: the Grand Jury "heard testimony" and "received testimony" that County employees "believe" the Board "wanted" them to take a tolerant approach toward code violations. The Board does not dispute that such testimony was received. However, the Board disagrees that testimony described in these terms—employees' beliefs about what the Board wanted, with no identified Board action, vote, resolution, or directive, all layered on the Grand Jury's own speculation about staff motives—provides any meaningful support for a finding that "the Board has encouraged employees to take a laissez-faire attitude toward new construction and business in the unincorporated area."

Altogether, the record before the Grand Jury, as the Grand Jury itself describes it, does not support this finding, and the Board is aware of no other credible evidence that does. The Board must therefore strongly disagree with the Grand Jury's finding that it fostered a tolerant or "laissez-faire" attitude toward new business and construction, and the Board rejects the Report's baseless implication that any such attitude—rather than the very limited conditions existing in mid-2022, as detailed above—may have discouraged County staff from taking additional actions at the Esparto site.

Finding F15. The Board of Supervisors has not provided adequate resources for the enforcement of building and safety codes.

Response: The Board disagrees with this finding.

As context for this response, the Board of Supervisors is the governing body of the County. Its principal role is to set Countywide policy—expressed through its formal actions and the County Code, General Plan, Strategic Plan, and other official actions. The Board allocates resources through the annual budget process, ensuring limited County funding is allocated in an appropriate manner that balances community needs, Board priorities, and federal and state mandates. The Board does not directly dictate most aspects of how County functions and services are carried out at the department level by the approximately 1,650 employees of the County. Such decisions are left to the sound discretion of department heads in coordination (as needed) with the County Administrator.

This Board asserts that it has faithfully funded the Building Division of the Department of Community Services at a level sufficient to discharge its inspection and enforcement duties under the California Building Code and related uniform codes. Such services are also supported by fees on building permits and related approvals, as is customary across the state. The Board is unaware of any connection between the resources it approves through the annual budget process for the Building Division and the deficiencies alleged in the Report, particularly relating to conditions on the Esparto Site. Indeed, the Chief Building Official successfully engaged with representatives of the Esparto Site owners to require a building permit for the (as they misrepresented) agricultural storage building then under construction. In connection with that matter or otherwise, at no point was the Board apprised that the Chief Building Official or other Building Division staff lacked the resources necessary to perform their work to enforce building and safety codes. In fact, the Report acknowledges the success of the Building Division's efforts in this regard. (Report at p. 13, stating, "The property owner agreed to the full permitting process, including revisions, fees, and inspections.").

To the extent this finding is directed at the resources allocated by the Board through the annual budget process to support code enforcement—a distinct function from "building and safety code" enforcement—the Board also disagrees with this finding. This Board has consistently funded code enforcement and related functions—such as Environmental Health, the Agricultural Commissioner, and the Consumer Fraud and Environmental Protection Unit of the District Attorney's office—at a level consistent with its best understanding of what is needed to protect public health and safety. This Board has done so even though some such functions, including code enforcement, are entirely discretionary (see footnote 3, above) and the Board has no obligation to fund them at any particular level or at all.

Finding F16. At the time (2022–2023) building permits were issued for the Machado property the following County officials failed to enforce California Fire Code and Yolo County Fireworks Ordinances: (a) Department of Community Services Chief Assistant Director; (b) Principal Planner; (c) Chief Building Official; (d) Supervising Hazardous Materials Specialist; (e) Code Enforcement Officer; (f) Building Inspector(s); (g) Esparto Fire Protection District Chief; (h) Yolo County Sheriff's Lieutenant; (i) Yolo County Sheriff's Esparto Resident Deputy.

Response: The Board disagrees partially with this finding.

Except as necessary to provide factual context, the following response does not address the portion of this finding relating to the former Sheriff's Lieutenant now charged with various crimes in *People v. Chee, et al.*, out of respect for those proceedings and the ongoing investigation occurring in connection therewith.

The Board acknowledges that there are no records indicating that County staff took any enforcement action relating specifically to fireworks in the 2022-2023 timeframe, including under the California Fire Code or the County Fireworks Ordinance. County records show instead that the Chief Building Official required the property owner to obtain a building permit for an agricultural storage building after viewing certain building features, including an electrical panel, at the conclusion of the June 2, 2022 inspection. The final certificate of occupancy (concluding the building permit process) was issued on April 20, 2023, and authorized the building to be used for commercial storage for Building Code reasons.⁴ The indictments filed in *People v. Chee, et al.* identify the landowner's affirmative misrepresentations in this regard as the basis for various felony charges.

The Board expresses no position as to other staff positions identified in this finding, given their lack of direct responsibility for enforcing the California Fire Code or the Fireworks Ordinance. Generally:

- Enforcement of the California Fire Code rests primarily with State Fire Marshal, local fire protection districts, and Building Division staff (including the Chief Building Official).
- Fireworks are regulated at both the state and local level, with the State Fire Marshal and CAL FIRE responsible for enforcing provisions of the State Fireworks Law (California Health & Safety Code sections 12500 *et seq.*).
- Responsibility for enforcing violations of the Fireworks Ordinance relating to dangerous fireworks storage rests primarily with Code Enforcement (staffed by a Code Enforcement Officer and supervised by the Chief Building Official, addressed previously in this response). While the Sheriff's Office is authorized to enforce some provisions of the Fireworks Ordinance, its enforcement role on storage and other property use matters is secondary to County code enforcement staff.

Lastly, the Esparto Fire Protection District Chief is the chief of an independent special district and is not an employee subject to the Board's direct oversight. The Board takes no position on individual conduct within the Esparto Fire Protection District.

⁴ This is the lowest-level occupancy that can be certified under the Building Code, and it allows the farm equipment storage activities represented as the landowners' intended use. A commercial storage occupancy does not authorize the storage or handling of explosives or dangerous fireworks.

III. FINDINGS DIRECTED TO THE DEPARTMENT OF COMMUNITY SERVICES

The Department of Community Services provides the following responses to Findings F6-F13. Some of the following responses were prepared with input from Darren Pytel, the former City of Davis Police Chief (2015-2024) who is currently serving as an extra-help attorney in the Office of the County Counsel. During his 41-year tenure with the City of Davis, Mr. Pytel managed code enforcement for 14 years and developed close familiarity with its operations. Mr. Pytel is concluding an independent assessment of the County's code enforcement program to inform ongoing work directed at enhancing its effectiveness.

Finding F6. The Community Services Department lacks appropriate formal training programs for new employees. Instead, instruction is provided informally via on-the-job mentoring.

Response. The Department disagrees partially with this finding.

The Department disagrees with F6 to the extent it concludes that appropriate formal training is absent and that new employees are instructed only through informal on-the-job mentoring. Both formal and on-the-job training are used, and the combination is appropriate for the multidisciplinary, field-based work the Department performs.

New and existing staff are required or encouraged to pursue training through state and professional partners, including the California Association of Code Enforcement Officers (CACEO), the International Code Council (ICC), California Building Officials (CALBO), the Sacramento Valley Association of Building Officials (SVABO), and others, and management directs staff toward coursework suited to their assignments. Code Enforcement Officers must hold Penal Code section 832 certification as a condition of the position, and since 2022 staff have maintained CACEO's Certified Code Enforcement Officer (CCEO) certification and are encouraged to attend annual conferences to stay current with statewide standards.

On-the-job training complements this formal instruction. Effective code enforcement requires applying general principles to specific cases—work learned through direct exposure to inspections, interdepartmental collaboration, guided case review, and consultation with subject-matter specialists. That experiential component cannot be fully replaced by classroom training. This combined approach has supported the transfer of institutional knowledge to new personnel.

The Department nonetheless recognizes that more formalized onboarding, training documentation, and a structured continuing-education program would improve consistency and accountability, and it is assessing its current approach with those improvements in view. This finding is addressed further in the responses to Recommendations R2 and R3.

Finding F7. Community Services Department employees are not trained on a wide variety of County ordinances that would increase public safety and County revenues.

Response. The Department disagrees partially with this finding.

The Department includes many divisions and functions, including planning, building, public works, environmental health, fleet management, and the Landfill, and the Department does not agree that it is practical or necessary to provide "training on a wide variety of County ordinances" to employees across the Department. However, the Department is assessing instances where more training focused on County ordinances relevant to specific job functions would be helpful.

The suggestion of a relationship between employee training and opportunities to increase County revenues is unclear and not supported by the Report. To the extent this is directed at code enforcement, while certain enforcement activities may result in revenue collection through permit fees and fines or penalties, these outcomes are incidental to the County's core enforcement objectives. In most cases, staff work with property owners, businesses, and residents to resolve violations informally through education and other non-punitive measures before escalating enforcement to citations and penalties, which are generally reserved for situations involving significant public safety risks, environmental harm, or circumstances when voluntary compliance efforts have repeatedly been unsuccessful.

This Finding is addressed further in the response to Recommendation R3, below.

Finding F8. Yolo County lacks an effective electronic system for keeping track of code enforcement cases.

Response: The Department disagrees partially with this finding.

The Department currently uses "Clariti" to manage information relating to code enforcement matters. Clariti replaced an earlier system, "Trackit," for most purposes on January 1, 2023. Clariti generally performs well for Code Enforcement operations and provides important recordkeeping capabilities. Clariti includes parcel-level information, complaint tracking, and permit information, but much information is maintained outside of Clariti in other formats and existing software platforms are not fully integrated across various divisions of the Department of Community Services. The Department agrees that a more integrated enterprise-wide system—or improved interoperability among existing systems—could enhance coordination, improve transparency, reduce inefficiencies, and strengthen cross-departmental collaboration.

This Finding is addressed further in the responses to Recommendations R8-R10, below.

Finding F9. Yolo County operational code enforcement procedures are ineffective, and not in a state of control.

Response: The Department disagrees partially with this finding.

The County's ordinance framework—particularly Title 1, Chapter 5 of the Yolo County Code, adopted in 2020—reflects modern administrative enforcement practices, including standardized notice and citation procedures, hearing and appeal rights, nuisance abatement authority, administrative penalties, and cost-recovery mechanisms. Additionally, the Department believes that the code enforcement program is effective at addressing violations throughout the unincorporated area, that staff receive significant practical and ongoing training, and that interdepartmental coordination has improved over time. Room for improvement remains, but the Department does not agree that program procedures are "ineffective" or "not in a state of control."

This Finding is addressed further in the response to Recommendations R8-R10, below.

Finding F10. Yolo County's systems are isolated across departments, which impedes effective exchange of specialized information.

Response: The County disagrees partially with this finding.

Information exchange across departments and even across divisions of the Community Services Department is impeded by fragmented technology and reliance on informal coordination. For example, the Clariti case management platform is generally functional within Code Enforcement, but Environmental Health operates on a separate platform, supporting documentation is frequently maintained in shared drives outside the case management system, and various other functions are less than optimal. As a result, staff may be required to access multiple systems to obtain a complete understanding of a property history, active permits, prior violations, complaint activity, inspection records, or enforcement actions.

In these and other ways, County technology systems are fragmented and create some inefficiencies and operational limitations. These challenges are mitigated by frequent collaboration and effective communication within the Department and with other County departments as needed. The Department is evaluating other potential ways to reduce these challenges, as reflected in its responses to Recommendations R8-R10, below.

Finding F11. Code enforcement activities are sometimes performed without documentation or effective procedures to evaluate the quality of the work and its timely completion.

Response: The Department disagrees partially with this finding.

In most circumstances, enforcement and regulatory activities are documented at a level appropriate for operational needs. Existing records systems, permit files, inspection reports, emails, photographs, case notes, and enforcement tracking systems collectively provide substantial documentation regarding Departmental activities and decisions. That said, the Department has not formalized the procedures necessary to consistently evaluate the quality and timely completion of code enforcement activities. The Department acknowledges that while staff routinely maintain records relating to complaints, inspections, notices, correspondence, enforcement actions, and case outcomes, the Department's ability to systematically evaluate the progress and quality of work performed is hampered by the lack of formal procedures, defined timeframes, and a framework for consistent supervisory review.

This Finding is addressed further in the responses to Recommendation R8-R10, below.

Finding F12. The lack of effective code enforcement procedures allows County staff to avoid challenging or uncomfortable cases by selectively prioritizing less critical activities.

Response: The Department disagrees with this finding.

The Department acknowledges that the current prioritization framework is informal, and that this environment can result in short-term reactive demands displacing longer-term enforcement priorities—not because anyone affirmatively chooses that outcome, but because no procedural framework to ensure consistent risk-based prioritization is in place. The Department disagrees that this procedural situation is something that County staff use to avoid challenging or uncomfortable cases. No evidence supporting this assertion appears in the Report. The Report's characterization frames the conduct in terms of staff motive, and neither the Grand Jury's record nor the Department's work in coordination with Mr. Pytel supports it. The Grand Jury itself acknowledges that it "could not determine definitively" why officials did not take additional action regarding the Esparto referral. The Department believes, and expects Mr. Pytel's assessment to confirm, that it has a strong service-oriented culture, significant institutional resilience despite resource

limitations, and a continued commitment to responsiveness and public service. Altogether, the Department's primary challenges are no different than the systemic and operational challenges faced state-wide by public agency staff and cannot be imputed to staff motives.

Finding F13. The Community Services Department employs only one full-time code enforcement officer to enforce County codes across nearly one thousand square miles of unincorporated Yolo County area.

Response: The Department agrees with this finding.

The Community Services Department currently employs one full-time code enforcement officer responsible for code enforcement activity across the unincorporated area of the County, and the Department accepts the Civil Grand Jury's underlying concern that this staffing level is constrained relative to the County's geographic size and the volume of complaint-driven and proactive enforcement responsibilities the program carries. At the same time, the finding does not acknowledge that code enforcement responsibilities are shared with Building Services, Planning, Environmental Health, and other Community Services personnel who frequently identify and enforce codes or refer violations during their regular duties. Additionally, certain civil and criminal laws are enforced by law enforcement and/or directly by the District Attorney's Office. The Code Enforcement Officer is a subject matter expert on the due process and enforcement mechanisms specific to the Yolo County Code to achieve voluntary compliance whenever possible, and compelled compliance otherwise. They work with other subject matter experts that know their portions of the Yolo County Code (and related state and federal laws, in some instances) in detail, such as Building, Planning, Environmental Health, and other staff. They are not responsible for all code enforcement activities occurring in the unincorporated areas of the County.

This Finding is addressed further in the response to Recommendation R5, below.

ATTACHMENT B—RESPONSES TO RECOMMENDATIONS

The Report directed Recommendations R1–R10 to the Board for a response and Recommendations R11–R16 to the Sheriff. It also invited responses from the County Administrative Officer (R1–R6), the County Counsel (R3), the Director of the Department of Community Services (R8–R10), and the LAFCO Executive Director (R7).

For each recommendation directed to it, the Board concurs with the position and explanation provided below and adopts each response as its own. The Department of Community Services contributed to most of the following responses—not only those it was invited to address—because they bear on Department operations. The responses below are therefore presented on behalf of the County respondents generally, with additional information provided on behalf of the Department director where noted. As used below, “Department” refers to the Department of Community Services unless otherwise indicated.

Recommendation R1. Beginning in the 2026-27 fiscal year, create the position of Yolo County Fire Warden, to:

- a. Establish a fire prevention and inspection program in the unincorporated portions of the County;**
- b. Facilitate cooperation and communication among the County Fire Districts, and provide consistent and continued training to develop expertise and accountability among Fire District Chiefs;**
- c. Act as the County’s liaison with appropriate State and Federal agencies.**

Response: This recommendation requires further analysis.

Presently, in coordination with other County departments, the County Administrator’s Office is evaluating an alternative approach that could achieve many of the objectives described in this recommendation. Based on feedback from local fire prevention district chiefs, County staff do not believe that hiring a dedicated “Fire Warden” or similar position is necessary. The County Administrator’s Office tentatively intends to include some advisory functions reflecting this recommendation and related matters in the updated job specification for the Director of the Yolo County Office of Emergency Services. The anticipated role will include fire safety and prevention functions to augment the services provided by the districts and County personnel, but overall it will be somewhat more limited than this recommendation proposes.

This approach remains under consideration and a determination is expected within 90 days from the date of this response.

Recommendation R2. Direct the County Community Services Department to establish an enhanced professional ethics training program to be delivered to all Community Services staff annually, that emphasizes:

- a. the employee’s responsibility to protect public safety;**
- b. recognizing and reporting potential public safety hazards; and**
- c. identifying and reporting potential zoning violations.**

Response: This recommendation will be implemented within one year.

The County respondents support annual professional ethics training and agree that reinforcing public-service obligations sustains public trust, accountability, and consistent regulatory enforcement. The County respondents understand the recommendation to propose a forward-looking reinforcement of its staff's existing commitment to those obligations, and does not understand R2 to imply—nor does it itself find—that staff fell short of them in matters relating to the Esparto site.

Within the Community Services Department, professional ethics, public safety responsibilities, and accountability are already embedded as expectations. However, a more formalized and Department-specific annual training program would provide additional operational value and reinforce consistency across Department Divisions. The Department anticipates incorporating various themes identified in this recommendation into broader annual professional development and compliance training programs rather than creating a separate standalone program.

Recommendation R3. Direct the County Community Services Department to provide annual training covering the County Code of Ordinances to relevant employees in the following divisions: Planning, Building, Code Enforcement, and Environmental Health. The training shall focus on the employees' responsibilities for enforcement of codes under their purview. The training content should include pertinent sections of the following codes:

- a. **County Fireworks Ordinance (Chapter 2, Section 4-2)**
- b. **County Zoning Code for Rural Home Occupation (Section 8-2.306ab)**
- c. **County Agricultural Zoning (Chapter 2, Sections 3)**
- d. **California Building Codes 2025 (Volumes 1 and 2, Title 24, Part 2)**
- e. **California Fire Code 2025 (Title 24, Part 9)**

Response: This recommendation will be implemented within one year.

Personnel in the Planning, Building, Code Enforcement, and Environmental Health divisions of the Community Services Department already apply the codes within their purview as a regular part of their duties; the recommended training program's value lies in formalizing that knowledge, keeping current with code updates, and reinforcing consistency across divisions, rather than in supplying expertise staff lack. The Department believes a practical combination of formal annual refresher training, periodic legal and code update briefings, and supervised field application represents the most sustainable and effective approach. Staff will also receive training on procedures for identifying and referring issues (including potential violations) that are outside of their primary area of responsibility or experience. The County Counsel's office will support the training covered by this recommendation as needed in coordination with the Department.

Recommendation R4. Direct the Department of Community Services to develop a monitoring program by December 31, 2026, to:

- a. **use aerial surveys to identify new construction within the unincorporated county; and**
- b. **verify that all construction is properly permitted.**

Response: This recommendation will not be implemented because it is not warranted (part (a)); this recommendation requires further analysis (part (b)).

Regarding part (a) of this recommendation, a monitoring program that relies upon a new regime of aerial surveys would present cost and liability concerns. From a liability perspective, aerial surveys present Fourth Amendment and privacy issues. Several published court decisions have considered these issues and generally concluded that flights at ordinary commercial heights using widely available cameras (rather than specialized surveillance equipment) are generally lawful. (*E.g.*, *California v. Ciraolo* (1986) 476 U.S. 207; *Florida v. Riley* (1989) 488 U.S. 445.) However, a County program relying on conventional aircraft to produce survey information for review by Department staff would be prohibitively expensive. While cost concerns can be reduced by relying on drones, it is uncertain and perhaps unlikely that widespread drone use in the manner proposed in this recommendation would comply with the Fourth Amendment. Drones are not airplanes and do not fly at the same heights, can produce extremely high resolution imagery of private property, and—unlike conventional aircraft—drone overflights of private property are neither customary nor widely acceptable. The County respondents will continue to follow legal developments relating to the use of drones for code enforcement and related functions.

Regarding part (b) of this recommendation, Department staff have been working with other County departments and local fire protection districts to assess opportunities to improve the “ag exempt” permit program. While all building permits rely on owner representations about the nature and intended use of structures, ag exempt permits rely almost exclusively on such representations and inspections by Building Division staff are often not required or performed. This streamlines the construction of agricultural (and similar) buildings that present few life and safety risks, but concerns about misuse of the ag exempt program have been raised by local fire protection districts since the Oakdale Fire (even though, after the June 2, 2022 site visit, the Chief Building Official required the landowners to obtain a building permit for the metal storage building under construction). The Department will continue to coordinate with local fire protection districts and other County departments to present an item to the Board of Supervisors in the near future, and within no more than six months after the date of the Report’s publication.

Recommendation R5. Starting in the 2026-27 fiscal year, augment County Code Enforcement by:

- a. one additional full-time employee (FTE) for code enforcement; and**
- b. an additional one-half FTE as a clerical position to maintain and update the code enforcement tracking system.**

Response: This recommendation requires further analysis.

The County respondents support evaluating additional staffing resources for Code Enforcement operations. The County respondents recognize that current staffing levels create operational limitations given the size of the unincorporated County, the diversity of regulatory responsibilities, increasing case complexity, and growing public expectations regarding responsiveness and service delivery. At the same time, the County respondents note that enforcement responsibilities are not performed exclusively by a single position. Within the Department of Community Services alone, personnel from multiple Divisions, including Building Services, Environmental Health, and related programs, regularly identify, document, refer, and assist with enforcement-related issues encountered during their normal duties. This collaborative and interdisciplinary approach helps distribute certain responsibilities across the Department and partially offsets existing staffing limitations.

The Department and the County Administrator's Office also recognize that staffing decisions must be evaluated within the context of broader County fiscal conditions, organizational priorities, long-term workload trends, and competing operational needs. Additional staffing positions involve not only salary and benefit costs, but also long-term obligations relating to training, supervision, equipment, vehicles, technology, office space, and ongoing operational support.

Accordingly, the Department and the County Administrator's Office believe future staffing decisions would benefit from a comprehensive workload and service-level analysis. The analysis could consider, among other things, existing complaint volume, case complexity, geographic coverage, response expectations, and enforcement goals. The goal would be to provide an objective staffing evaluation to assist Department leadership, the County Administrative Officer, and the Board of Supervisors in balancing resource allocation decisions against broader County priorities and fiscal constraints.

Penal Code section 933.05 requires further analysis proposed in response to a Grand Jury recommendation to occur "within six months from the date of publication of the grand jury report." This is an ambitious timeframe for the workload and service-level analysis proposed in response to this recommendation, but the County respondents will strive to meet this timeframe.

Recommendation R6. Starting in the 2026-27 fiscal year, create a full-time position for a County-wide Business Systems Analyst reporting to the County Chief Administrative Officer, with the responsibility of consulting with individual departments to effect operational improvements within the department and across all County services.

a. The analyst's role is to provide the following consultation services to individual departments via short-term (2-4 month) focused assignments, to:

- i. Assist in documenting processes: current workflows, future workflows, identify gaps, risks, waste, and opportunities for improvement;**
- ii. Assist in the creation of standard operating procedures;**
- iii. Design solutions to operational challenges by recommending system upgrades, or new technologies;**
- iv. Facilitate incremental improvement projects.**

b. The analyst duties are to provide the following services to the County generally, to:

- i. Maintain a generalized understanding of all County operations;**
- ii. Facilitate collaboration within and across departments that provide opportunities to improve County services (speed, cost, quality);**
- iii. Work closely with IT teams to oversee the implementation of new systems or enhancements, ensuring effective integration with existing operational procedures;**
- iv. Assist the County in defining functional requirements of digital systems and validate the implemented systems function as intended;**
- v. Act as an intermediary with 3rd party software vendors/developers to evaluate and ensure implemented solutions meet County needs.**

Response. This recommendation will not be implemented because it is not warranted. The responsibilities of the proposed analyst position are already performed to varying degrees by County staff in different offices, including the County Administrator's Office, the Department of

Innovation and Technology Services, and by personnel performing similar specialized functions within certain (typically larger) County departments. The County does not believe that an additional, centralized position would efficiently achieve the objectives included in this recommendation. Rather, these objectives are best advanced by continuing to follow the current approach of relying on various staff across the organization to contribute their subject matter expertise to improving processes, procedures, and new technologies with the goal of enhancing the provision of County services.

Recommendation R7. Request Local Agency Formation Commission (LAFCO) to revisit its July 28, 2022 Municipal Services Review (MSR) for fire protection agencies and initiate where feasible a process for joining adjacent fire districts.

a. Request LAFCO evaluate aggregating adjacent fire districts, as suggested in the MSR (July 28, 2022).

Response. This recommendation will not be implemented because it is not necessary, as LAFCO has already (in its response to the Grand Jury) committed to take the recommended action.

Recommendation R8. Document processes for all routine workflows, which should include:

- a. process maps showing routine workflows;**
- b. standard operating procedures;**
- c. training/qualification programs for procedures and systems; and**
- d. define reasonable expected timeframes and outcomes for each process step.**

Response: This recommendation will be implemented within one year.

The Department supports documenting routine operational workflows and developing more formalized procedures and expectations. Formalizing these processes would strengthen consistency, improve onboarding, and enhance transparency and accountability.

Recommendation R9. Implement a system for tracking the completion of all routine work, which should include:

- a. permanent traceable records of activities performed and decisions made; and**
- b. auditable metrics and traceable activity records by parcel or agent.**

Response: This recommendation will be implemented within one year.

The Department supports enhanced performance tracking and recordkeeping systems. Many of these improvements may be achievable through enhanced use of existing software combined with any future technology upgrades and operational refinements that are implemented.

Recommendation R10. Implement a system for tracking the administration of non-routine work, which should include:

- a. documenting staff training and certifications. The system should provide training metrics for individual employees and departments;**

- b. reporting and tracking deviations from standard operating procedures or outcomes, with a permanent traceable record of activities performed, expert evaluations, and decisions made; and**
- c. monitoring overall progress of routine workflows and intervening as necessary to ensure work conforms to standard procedures and expectations.**

Response: This recommendation will be implemented within one year.

The Department supports enhanced tracking of non-routine work, including the use of a training matrix to monitor current and new employee training requirements and goals. Using the processes and procedures established in R8, the Department can identify deviations from standard operating procedures through case documentation in Clariti. Electronic case files in Clariti store communications, violations, notes, and other relevant information, allowing management and staff to review cases and ensure that proper processes and procedures are consistently followed.