SAN DIEGO COUNTY ASSESSMENT PRACTICES SURVEY

NOVEMBER 2025

CALIFORNIA STATE BOARD OF EQUALIZATION

STATE OF CALIFORNIA

STATE BOARD OF EQUALIZATION
PROPERTY TAX DEPARTMENT
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November 12, 2025

TO COUNTY ASSESSORS:

No. 2025/037

SAN DIEGO COUNTY
ASSESSMENT PRACTICES SURVEY

A copy of the San Diego County Assessment Practices Survey Report is enclosed for your information. The State Board of Equalization (BOE) completed this survey in fulfillment of the provisions of sections 15640–15646 of the Government Code. These code sections provide that the BOE shall make surveys in specified counties to determine that the practices and procedures used by the County Assessor in the valuation of properties are in conformity with all provisions of law.

The Honorable Jordan Z. Marks, San Diego County Assessor/Recorder/County Clerk, was provided a draft of this report and given an opportunity to file a written response to the findings and recommendations contained therein. The report, including the Assessor's response, constitutes the final survey report, which is distributed to the Governor, the Attorney General, and the State Legislature; and to the San Diego County Board of Supervisors, Grand Jury, and Assessment Appeals Board.

Fieldwork for this survey was performed by the BOE's Assessment Practices Survey Division from October 2024 through May 2025. The report does not reflect changes implemented by the Assessor after the fieldwork was completed.
Mr. Marks and staff gave their complete cooperation during the survey. We gratefully acknowledge their patience and courtesy during the interruption of their normal work routine.

Sincerely,

/s/ David Yeung

David Yeung
Deputy Director
Property Tax Department

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Enclosure

TABLE OF CONTENTS

INTRODUCTION

Although county government has the primary responsibility for local property tax assessment, the State has both a public policy interest and a financial interest in promoting fair and equitable assessments throughout California. The public policy interest arises from the impact of property taxes on taxpayers and the inherently subjective nature of the assessment process. The financial interest derives from state law that annually guarantees California schools a minimum amount of funding; to the extent that property tax revenues fall short of providing this minimum amount of funding, the State must make up the difference from the general fund.

The assessment practices survey program is one of the State's major efforts to address these interests and to promote uniformity, fairness, equity, and integrity in the property tax assessment process. Under this program, the State Board of Equalization (BOE) periodically reviews the practices and procedures (surveys) of specified County Assessors' offices. This report reflects the BOE's findings in its current survey of the San Diego County Assessor/Recorder/County Clerk Office.[1]

The Assessor is required to file with the board of supervisors a response that states the manner in which the Assessor has implemented, intends to implement, or the reasons for not implementing the recommendations contained in this report. Copies of the response are to be sent to the Governor, the Attorney General, the BOE, and the Senate and Assembly; and to the San Diego County Board of Supervisors, Grand Jury, and Assessment Appeals Board. That response is to be filed within one year of the date the report is issued and annually thereafter until all issues are resolved. The Honorable Jordan Z. Marks, San Diego County Assessor/Recorder/County Clerk, elected to file their initial response prior to the publication of our survey; it is included in this report following the Appendices.

[1] This review covers only the assessment functions of the office.

OBJECTIVE

The survey shall "…show…the extent to which assessment practices are consistent with or differ from state law and regulations."[2] The primary objective of a survey is to ensure the Assessor's compliance with state law governing the administration of local property taxation. This objective serves the three-fold purpose of protecting the state's interest in the property tax dollar, promoting fair treatment of taxpayers, and maintaining the overall integrity and public confidence in the property tax system in California.

The objective of the survey program is to promote statewide uniformity and consistency in property tax assessment by reviewing each specified county's property assessment practices and procedures, and publishing an assessment practices survey report. Every Assessor is required to identify and assess all properties located within the county – unless specifically exempt – and maintain a database or "roll" of the properties and their assessed values. If the Assessor's roll meets state requirements, the county is allowed to recapture some administrative costs.

SCOPE AND METHODOLOGY

Government Code sections 15640 and 15642 define the scope of an assessment practices survey. As directed by those statutes, our survey addresses the adequacy of the procedures and practices employed by the Assessor in the valuation of property, the volume of assessing work as measured by property type, and the performance of other duties enjoined upon the Assessor.

Pursuant to Revenue and Taxation Code[3] section 75.60, the BOE determines through the survey program whether a county assessment roll meets the standards for purposes of certifying the eligibility of the county to continue to recover costs associated with administering supplemental assessments. Such certification is obtained either by satisfactory statistical result from a sampling of the county's assessment roll or by a determination by the survey team – based on objective standards defined in regulation – that there are no significant assessment problems in the county.

This survey included an assessment sample of the 2023-24 assessment roll to determine the average level (ratio) of assessment for all properties and the disparity among assessments within the sample. The ideal assessment ratio is 100 percent, and the minimum acceptable ratio is 95 percent. Disparity among assessments is measured by the sum of absolute differences found in the sample; the ideal sum of absolute differences is 0 percent and the maximum acceptable number is 7.5 percent. If the assessment roll meets the minimum standards for ratio and disparity, the county is eligible to continue to recover the administrative cost of processing supplemental assessments.[4]

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[2] Government Code section 15642.
[3] Unless otherwise stated, all statutory references are to the California Revenue and Taxation Code and all rule references are to sections of California Code of Regulations, Title 18, Public Revenues.
[4] The scope of our review of the assessment sampling program is provided on the BOE website at https://www.boe.ca.gov/proptaxes/assessment-practices-survey-division/sampling.htm.

Our survey methodology of the San Diego County Assessor/Recorder/County Clerk Office included reviews of the Assessor's records, interviews with the Assessor and their staff, and contacts with officials in other public agencies in San Diego County who provided information relevant to the property tax assessment program.

For a detailed description of the scope of our review of county assessment practices, please refer to the BOE's website at https://www.boe.ca.gov/proptaxes/assessment-practices-survey-division/scope.htm. Additionally, detailed descriptions of assessment practices survey topics, authoritative citations, and related information can be found at https://www.boe.ca.gov/proptaxes/assessment-practices-survey-division/survey.htm.

EXECUTIVE SUMMARY

This report offers recommendations to help the Assessor correct assessment problems identified by the survey team. The survey team makes recommendations when assessment practices in a given area are not in accordance with property tax law or generally accepted appraisal practices. An assessment practices survey is not a comprehensive audit of the Assessor's entire operation. The survey team does not examine internal fiscal controls or the internal management of an Assessor's office outside those areas related to assessment. In terms of current auditing practices, an assessment practices survey resembles a compliance audit – the survey team's primary objective is to determine whether assessments are being made in accordance with property tax law.

We examined the assessment practices of the San Diego County Assessor's Office for the 2023-24 assessment roll.

During our survey, we conducted reviews of the following areas:

- Administration

  We reviewed the Assessor's administrative policies and procedures that affect both the real property and business property assessment programs. Specific areas reviewed include budget and staffing, workload, assessment appeals, and exemptions. In the area of administration, the Assessor is effectively managing the workload, assessment appeals, and exemptions.

- Assessment of Real Property

  We reviewed the Assessor's program for assessing real property. Specific areas reviewed include properties having experienced a change in ownership, new construction assessments, and declines in value. In the area of real property assessment, the Assessor has effective programs for change in ownership, new construction, and declines in value.

- Assessment of Personal Property and Fixtures

  We reviewed the Assessor's program for assessing personal property and fixtures. Specific areas reviewed include conducting audits, processing business property statements, and business equipment valuation. In the area of personal property and fixtures assessment, the Assessor has an effective program for business equipment valuation. However, we made recommendations for improvement in the audit and business property statement programs.

Despite the recommendations noted in this report, we found most properties and property types are assessed correctly, and the overall quality of the assessment roll meets state standards.

The San Diego County assessment roll meets the requirements for assessment quality as established by section 75.60. Our sample of the 2023-24 assessment roll indicated an average assessment ratio of 99.51 percent, and the sum of the absolute differences from the required assessment level was 0.53 percent. Accordingly, the BOE certifies that San Diego County is eligible to receive reimbursement of costs associated with administering supplemental assessments.

OVERVIEW OF SAN DIEGO COUNTY

San Diego County is located in southern California and is one of California's original 27 counties created in 1850. The county encompasses a total area of 4,525.68 square miles, consisting of 4,206.63 square miles of land area and 319.05 square miles of water area. San Diego County is bordered by Orange and Riverside Counties to the north, Imperial County to the east, Mexico to the south, and Pacific Ocean to the west.

As of 2020, San Diego County had an estimated population of 3,298,647. There are 18 incorporated cities in San Diego County. The county seat is San Diego.

The San Diego County local assessment roll ranks 3rd in value of the 58 county assessment rolls in California.[5]

[5] Statistics provided by the BOE Open Data Portal dataset - *County Assessed Property Values, by Property Class and County (Table 7),* for year 2023-24.

FINDINGS AND RECOMMENDATIONS

As noted previously, our review concluded that the San Diego County assessment roll meets the requirements for assessment quality established by section 75.60. This report does not provide a detailed description of all areas reviewed; it addresses only the deficiencies discovered.

Following is a list of the formal recommendations contained in this report.

ASSESSMENT OF PERSONAL PROPERTY AND FIXTURES

Audit Program

Prior to January 1, 2019, County Assessors were required to annually conduct a significant number of audits as specified in section 469. The significant number of audits required was at least 75 percent of the fiscal year average of the total number of mandatory audits the Assessor was required to have conducted during the 2002–03 fiscal year to the 2005–06 fiscal year, with 50 percent of those to be selected from a pool of those taxpayers with the largest assessments.[6] However, effective January 1, 2019, Senate Bill 1498 (Stats. 2018, Ch. 467) amended section 469 to provide County Assessors flexibility in meeting this annual audit requirement. Thus, beginning with the 2019–20 fiscal year, Assessors may also meet the requirements of section 469 by completing the four-year total of required annual audits within that four-year period. The first four-year period began with the 2019–20 fiscal year and ends with the 2022–23 fiscal year.

RECOMMENDATION 1: Perform the minimum number of audits of professions, trades, and businesses pursuant to section 469.

We found that the Assessor did not meet the minimum number of audits required by section 469 for the four-year fiscal period beginning with the 2019-20 fiscal year and ending with the 2022-23 fiscal year. The Assessor completed a total of 2,321 audits for the four-year fiscal period, falling short of the required 2,336 audits.

For the 2019-20 to 2022-23 four-year fiscal period, section 469 required the Assessor to audit 2,336 taxpayers, with 1,168 of those audits from the pool of largest business property assessments and 1,168 of the audits from the pool of all other business property owners.

By failing to conduct the minimum number of audits for the four-year fiscal period, the Assessor was not in compliance with section 469 and risked the possibility of allowing taxable property to permanently escape assessment.

Business Property Statement Program

Each person owning taxable personal property (other than a manufactured home) having an aggregate cost of $100,000 or more annually file a business property statement (BPS) with the Assessor, other persons must file a BPS if requested by the Assessor. Property statements form the backbone of the business property assessment program.[7]

[6] The scope of our review for the audit program topic is provided on the BOE website at https://boe.ca.gov/proptaxes/audit-program/.

[7] The scope of our review for the business property statement program topic is provided on the BOE website at https://boe.ca.gov/proptaxes/business-property-statement-program/.

RECOMMENDATION 2: Consistently apply a penalty assessment to all business property accounts that file late or fail to file a BPS in accordance with section 463.

We found that the Assessor does not consistently apply the section 463 penalty assessment to business property accounts when a required BPS is filed late.

Section 463(a) states, in relevant part, that if any person who is required by law or is requested by the Assessor to make an annual property statement fails to file an annual property statement within the time limit specified, a penalty of 10 percent of the assessed value of the unreported taxable tangible property of that person placed on the current roll shall be added to the assessment made on the current roll.

By not consistently applying the penalty required by law when a taxpayer files late, the incentive to file a property statement is diminished, which may result in unequal treatment of taxpayers and a possible loss of tax revenue.

APPENDIX A: STATISTICAL DATA

Table 1: Assessment Roll

The following table displays pertinent information from the 2023-24 assessment roll.[8]

	PROPERTY TYPE	ENROLLED VALUE
Secured Roll	Land	$344,663,409,626
	Improvements	$352,567,850,934
	Fixtures	$744,055,316
	Personal Property	$3,202,876,692
	Total Secured	$701,178,192,568
Unsecured Roll	Land	$0
	Improvements	$6,939,710,321
	Fixtures	$0
	Personal Property	$20,548,285,150
	Total Unsecured	$27,487,995,471
Exemptions[9]		($24,670,046,108)
	Total Assessment Roll	$703,996,141,931

Table 2: Change in Assessed Values

The following table summarizes the change in assessed values over recent years:[10]

ROLL YEAR	TOTAL ROLL VALUE	CHANGE	STATEWIDE CHANGE
2023-24	$703,996,142,000	7.1%	6.7%
2022-23	$657,087,892,000	8.4%	7.5%
2021-22	$605,917,770,000	3.5%	4.1%
2020-21	$585,622,626,000	5.4%	5.7%
2019-20	$555,863,989,000	5.7%	6.1%

[8] Statistics provided by BOE-822, *Report of Assessed Values by City*, County 37 San Diego for year 2023.
[9] The value of the Homeowners' Exemption is excluded from the exemptions total.
[10] Statistics provided by the BOE Open Data Portal dataset - County Assessed Property Values, by Property Class and County (Table 7).

Table 3: Gross Budget and Staffing

The Assessor's budget has grown from $42,928,400 in fiscal year 2018-19 to $50,392,181 in fiscal year 2022-23.

For fiscal year 2022-23, the Assessor had 303.85 budgeted permanent positions. These positions consist of the Assessor and 17.30 other managers, 89 real property appraisers, 38 business property auditor-appraisers, 17 drafting/mapping technicians, 5 computer programmers/analysts/technicians, 84.25 other technical/professionals, and 52.30 support staff.[11]

The following table identifies the Assessor's budget and staffing over recent fiscal years:[12]

FISCAL YEAR	GROSS BUDGET	PERCENT CHANGE	PERMANENT STAFF
2022-23	$50,392,181	4.9%	304
2021-22	$48,039,240	-1.2%	287
2020-21	$48,602,979	4.9%	291
2019-20	$46,349,965	8.0%	291
2018-19	$42,928,400	5.3%	293

Table 4: Assessment Appeals

The following table shows the number of assessment appeals filed in recent fiscal years:[13]

FISCAL YEAR	ASSESSMENT APPEALS FILED
2022-23	3,817
2021-22	4,351
2020-21	4,645
2019-20	4,094
2018-19	5,646

[11] Statistics provided by the BOE Open Data Portal dataset – Budgeted Permanent Positions.
[12] Statistics provided by the BOE Open Data Portal datasets – Gross and Net Budget and Budgeted Permanent Positions.
[13] Statistics provided by the BOE Open Data Portal dataset – Distribution of Assessment Appeals by Property Types.

Table 5: Exemptions – Welfare

The following table shows welfare exemption data for recent roll years:[14]

ROLL YEAR	WELFARE EXEMPTIONS	EXEMPTED VALUE
2023-24	4,739	$18,177,521,795
2022-23	5,050	$17,383,738,198
2021-22	5,095	$16,573,345,076
2020-21	4,903	$15,073,092,105
2019-20	5,043	$15,106,746,216

Table 6: Change in Ownership

The following table shows the total number of transfer documents received and the total number of reappraisable transfers due to changes in ownership processed in recent roll years:[15]

ROLL YEAR	TOTAL TRANSFER DOCUMENTS RECEIVED	REAPPRAISABLE TRANSFERS
2023-24	110,925	47,195
2022-23	162,333	64,658
2021-22	198,372	64,151
2020-21	146,117	60,820
2019-20	133,323	56,106

[14] Statistics provided by BOE-802, *Report on Exemptions*.
[15] Statistics provided by the BOE Open Data Portal dataset – *Real Property Workload Data, Transfers*.

Table 7: New Construction

The following table shows the total number of building permits received and the total number of new construction assessments processed in recent roll years:[16]

ROLL YEAR	TOTAL BUILDING PERMITS RECEIVED	NEW CONSTRUCTION ASSESSMENTS
2023-24	15,057	11,859
2022-23	14,081	11,859
2021-22	13,445	11,776
2020-21	14,150	13,124
2019-20	15,146	12,851

Table 8: Declines In Value

The following table shows the total number of decline-in-value assessments in recent roll years:[17]

ROLL YEAR	DECLINE-IN-VALUE ASSESSMENTS
2023-24	51,655
2022-23	38,604
2021-22	77,069
2020-21	87,744
2019-20	94,293

[16] Statistics provided by the BOE Open Data Portal dataset – *Real Property Workload Data, New Construction*.
[17] Statistics provided by the BOE Open Data Portal dataset – *Real Property Workload Data, Proposition 8*.

Table 9: Audits

The following table shows the minimum number of audits required to be conducted and the total number of audits completed in recent fiscal years.[18]

MINIMUM NUMBER OF AUDITS REQUIRED[19]	**2022-23**	**2021-22**	**2020-21**	**2019-20**	**2018-19**
Largest Assessments					292
All Other Taxpayers					292
Total Required					584
NUMBER OF AUDITS COMPLETED					
Total Audits Completed	532	601	555	651	520
Largest Assessments	292	292	292	292	292
Over/(Under) Required					0
All Other Taxpayers	240	309	263	359	228
Over/(Under) Required					(64)
CCCASE AUDITS					
Prepared for other county Assessors	0	0	0	0	0

[18] Statistics provided by the BOE Open Data Portal dataset – *Business Property Workload Data, Audits*.
[19] See Letter To Assessors (LTA) No. 2009/049, *Significant Number of Business Property Audits*, for the minimum number of annual audits required pursuant to the provisions of section 469 for year 2018-19. Effective January 1, 2019, section 469 was amended to give Assessors more flexibility in completing the number of audits by allowing for the four-year total of required annual audits to be completed within a four-year period of time, rather than annually, beginning with the 2019-20 fiscal year. For more information on the amendments to section 469, see LTA No. 2018/067.

APPENDIX B: ASSESSMENT PRACTICES SURVEY DIVISION / PROPERTY TAX DEPARTMENT SURVEY GROUP

San Diego County

Chief:

Holly Cooper

Survey Program Director:

Gary Coates	Principal Property Appraiser

Survey Team Supervisor:

Christine Erling	Supervising Property Appraiser

Survey Team:

Alexander B. Fries	Supervising Property Appraiser
James McCarthy	Senior Petroleum and Mining Appraisal Engineer
Jeff Arthur	Senior Specialist Property Auditor Appraiser
Vida McIsaac	Senior Specialist Property Auditor Appraiser
Artemis Oestreich	Senior Specialist Property Appraiser
Jennifer Prince	Senior Specialist Property Appraiser
Laura Ruiz	Senior Specialist Property Appraiser
Kat Santora	Senior Specialist Property Appraiser
Eric Collins	Associate Property Auditor Appraiser
Lydia Vannarattanarat	Associate Property Auditor Appraiser
Derrick Yee	Associate Property Auditor Appraiser
Amy Andresen	Associate Property Appraiser
Patience Bautista	Associate Property Appraiser
Nicole Grady	Associate Property Appraiser
Chris Howell	Associate Property Appraiser
Hanju Lee	Associate Property Appraiser

Margo Pearce	Associate Property Appraiser
Virginia Casarez	Assistant Property Appraiser
Troy Holt	Assistant Property Appraiser
Gregory Dela Cruz	Associate Governmental Program Analyst

APPENDIX C: RELEVANT STATUTES AND REGULATIONS

Reference	Description
Government Code	
§15640	**Survey by board of county assessment procedures.**
§15641	**Audit of records, appraisal data not public.**
§15642	**Research by board employees.**
§15643	**When surveys to be made.**
§15644	**Recommendations by board.**
§15645	**Survey report, final survey report, Assessor's report.**
§15646	**Copies of final survey reports to be filed with local officials.**
Revenue and Taxation Code	
§75.60	**Allocation for administration.**
Title 18, California Code of Regulations	
Rule 371	**Significant assessment problems.**

ASSESSOR'S RESPONSE TO BOE'S FINDINGS

Section 15645 of the Government Code provides that the Assessor may file with the Board a response to the findings and recommendations in the survey report. The survey report, the Assessor's response, and the BOE's comments regarding the Assessor's response, if any, constitute the final survey report.

The San Diego County Assessor's response begins on the next page. The BOE has no comments regarding the response.

JORDAN Z. MARKS
ASSESSOR/RECORDER/COUNTY CLERK
COUNTY OF SAN DIEGO
1600 PACIFIC HIGHWAY, SUITE 109, SAN DIEGO, CA 92101
www.SDARCC.gov

October 9, 2025

David Yeung, Deputy Director
Property Tax Department, MIC 63
State Board of Equalization
P.O. Box 942879
Sacramento, CA 94279-0064

Re: San Diego County 2023 Assessment Practices Survey

Dear Mr. Yeung:

Enclosed is San Diego County's response to the State Board of Equalization Assessment Practices Survey and its two recommendations. Please incorporate this response into your final Assessment Practices Survey Report.

I want to acknowledge my team and thank them for their hard work and dedication to public service and our important partnership with the California State Board of Equalization. This assessment practices survey reflects and recognizes the outstanding work done by my hard-working San Diego County Assessor's staff. Our work together on this audit to deliver transparency and accountability to taxpayers exemplifies our core values of collaboration, grace, innovation, and operational excellence.

Most importantly, thank you to the California State Board of Equalization survey team for their professionalism and collaborative efforts working with my team in reviewing our practices and procedures to ensure fair and equitable assessments. We view the assessment practices survey as a way to best serve our taxpayers of San Diego County.

Sincerely,

Jordan Z. Marks
Assessor/Recorder/County Clerk

JZM:cbu

Enclosure

JORDAN Z. MARKS
ASSESSOR/RECORDER/COUNTY CLERK
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BOE RECOMMENDATION 1: Perform the minimum number of audits of professions, trades, and businesses pursuant to section 469.

We acknowledge the BOE Survey team's recommendation. The review period encompassed the COVID pandemic which provided unique challenges to being able to accomplish the mandated workload. Audit staff completed a total of 2,321 audits over the four fiscal years 2019-2020 through 2022-2023. Based on R&T code section 469, we are required to conduct 2,336 audits over the four-year period. Due to COVID complexities, the team was 15 audits short for this period.

Now that the unique challenges of the COVID pandemic are behind us, the Assessor's office has taken the necessary steps to ensure compliance with section 469 moving forward.

BOE RECOMMENDATION 2: Consistently apply a penalty assessment to all business property accounts that file late or fail to file a BPS in accordance with section 463.

We acknowledge the BOE survey team's recommendation. Due to outdated technology and system limitations, the ability to identify late filed cross-secured accounts that do not have the mandated 10% is limited. The team is actively working towards securing a modern solution that will be able to accurately track and maintain late file penalties for all personal property accounts.