

Performance Audit of the City's Response to Homeless Encampments Since the Unsafe Camping Ordinance

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Audit Results

Overall, we found that the City of San Diego (City) coordinated its resources to respond to homeless encampments in alignment with the adoption of the Unsafe Camping Ordinance (Ordinance). However, systemwide resource challenges limit the City's ability to further reduce unsheltered homelessness.

Based on best-available data and our analyses, we found a reduction in the number of people living in public areas. We were unable to determine the specific geographic movement of the homeless population within the City.

We found the City's abatement storage procedures generally align with best practices, but that language accessibility and procedures could be improved.

We addressed five questions related to the City's response to encampments, and the detailed analyses follow in the body of this report.

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CITY OF SAN DIEGO



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

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- Mayor’s Office
- Regional Task Force on Homelessness
- Downtown San Diego Partnership
- People Assisting the Homeless (PATH)
- Dreams for Change
- San Diego River Park Foundation
- Sherman Elementary School
- Urban Discovery Academy
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Performance Audit of the City’s Response to Homeless Encampments Since the Unsafe Camping Ordinance

Why OCA Did This Study

To address the growth of homelessness, the City of San Diego (City) passed the Unsafe Camping Ordinance (Ordinance), which restricted camping in public spaces. Many stakeholders were uncertain of its potential consequences, such as if more people would accept shelter, or if encampments would be pushed into other areas of the City, remote locations, or far from services.

We incorporated these concerns into this audit. Specifically, we conducted a performance audit of the City’s response to homeless encampments since the adoption of the Unsafe Camping Ordinance with two objectives:

1. **Determine if the City efficiently and effectively uses its resources to respond to homeless encampments since the adoption of the Unsafe Camping Ordinance; and**
2. **Determine if the City’s personal property storage and disposal processes in relation to the Unsafe Camping Ordinance are practiced equitably.**

This audit does not evaluate the Ordinance itself, but rather the City’s operational response to encampments and the effects of the Ordinance.

What OCA Found

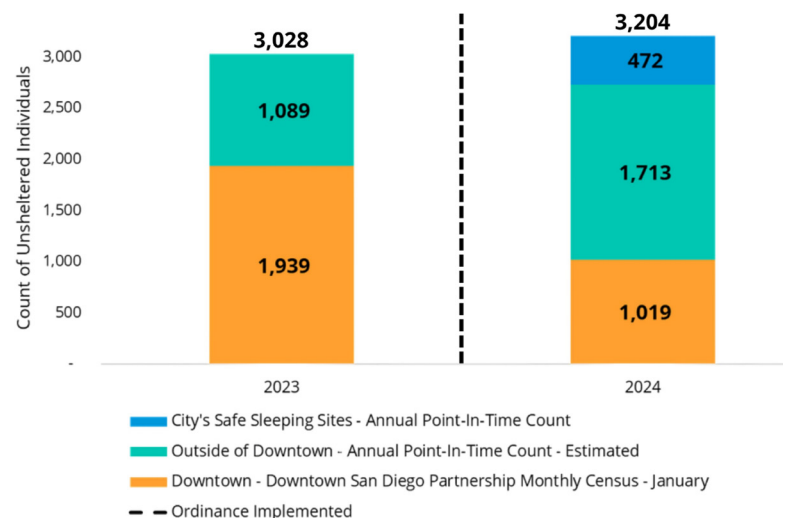
Question 1: Did the unsheltered population decrease in the City of San Diego since the implementation of the Unsafe Camping Ordinance?

- The unsheltered population, as defined by the U.S. Department of Housing and Urban Development, did not decrease across the City since the implementation of the Ordinance.
- The Ordinance and the opening of the City’s safe sleeping locations **appear to have reduced the number of people living in public areas.**
- External factors, such as uncertainty of future federal and State funding, impact the City’s ability to provide more shelters.

Question 2: Did the unsheltered population move from downtown to other areas of the City of San Diego after the implementation of the Unsafe Camping Ordinance?

- Monthly census counts showed a substantial decrease in the unsheltered population downtown after the Ordinance.
- Reported encampment locations did not significantly change; however, the City received an average of 13 percent more encampment reports in the two years after the implementation of the Ordinance, compared to the two years before.
- The number of encampment reports did not appear to substantially change around schools, parks, open spaces, and shelters with Ordinance signs.
- **While shelter referrals increased after the implementation of the Ordinance, City shelter space, including safe sleeping, was limited; therefore, most requests for shelter could not be met.**

Exhibit 5: After the Implementation of the Ordinance and the Opening of Safe Sleeping Sites, a Significant Portion of the Downtown Unsheltered Population Likely Moved to the Safe Sleeping Sites and Other Areas

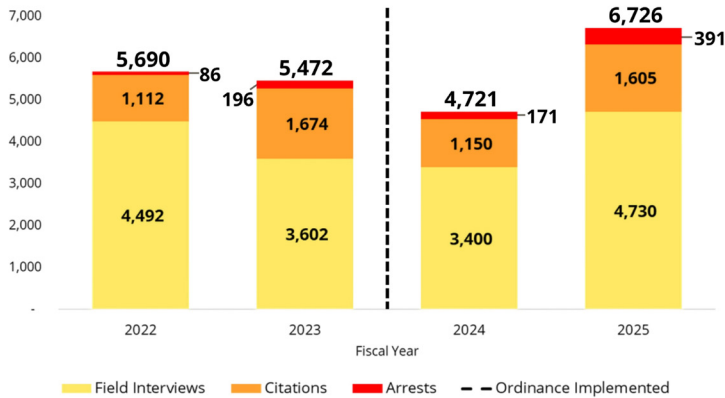


Source: OCA generated based on monthly census count data published by Downtown San Diego Partnership and published annual Point-in-Time Count data.

Question 3: Did the number of citations, arrests, and prosecutions for encampments increase after the Unsafe Camping Ordinance?

- SDPD uses a progressive enforcement model to encourage acceptance of shelter and services.
- After the implementation of the Ordinance, **the proportion of SDPD contacts for encampments that resulted in arrests slightly increased while the proportion that resulted in citations decreased.**
- There have been minimal prosecutions for violations of the Ordinance.

Exhibit 13: Most Violations of the Ordinance, Encroachment, and Illegal Lodging Resulted in Field Interviews Rather Than Citations or Arrests, Before and After the Implementation of the Ordinance

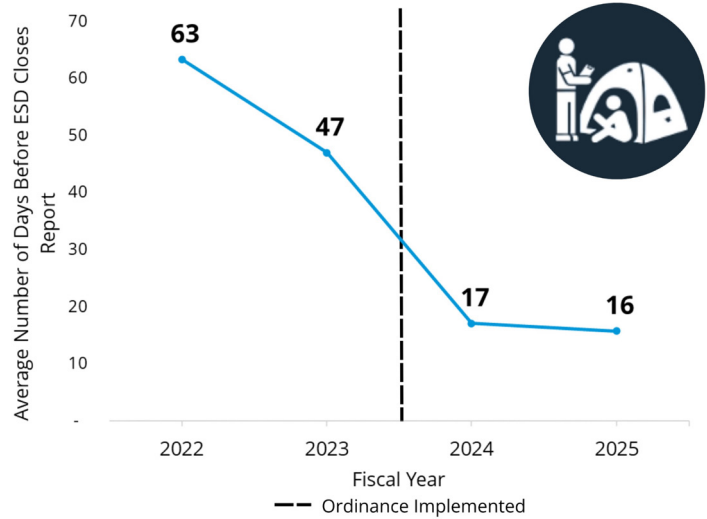


Note: This graph includes some contacts that resulted in multiple field interviews and citations for more than one violation.
 Source: OCA generated based on data SDPD provided from the Automated Regional Justice Information System (ARJIS).

Question 4: Did City departments work and coordinate in their response to encampments, after the implementation of the Ordinance, in accordance with the goals in the preamble of the Ordinance?

- **City departments regularly collaborated to effectively respond to encampments** and their prioritized responses to encampments aligned with the Ordinance and best practice.
- **Both SDPD and ESD responded more quickly to Get It Done encampment reports** after the Ordinance. In FY2024, ESD averaged 17 days to respond to an encampment report, compared to 47 days in FY2023. SDPD averaged 10 days to respond in FY2024, compared to 17 days in FY2023.

Exhibit 15: ESD Significantly Reduced Its Response Time to Reported Encampments



Source: OCA generated using Get It Done report data from the City's Open Data Portal.

Question 5: Does the City equitably store personal items from abatements?

- Extending the notice period prior to abatements allowed people more time to remove their belongings from encampments.
- Like most benchmark cities, San Diego stores items from abatements and its policies include examples of items it may store.
- **The City could further ensure accessibility by providing personal item impound notices in multiple languages.**

What OCA Recommends

We made **two recommendations** to ensure the City's item retrieval process is as accessible as possible. Specifically, ESD should:

- **Require a periodic review of its list of items City does not store**, and consider other cities' item storage policies and items that people frequently inquire about, even if they were not stored; and
- **Provide access to impound notices in Spanish and consider other commonly spoken languages** across the City.

ESD agreed to both recommendations.

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

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Background

Like many cities across California and the United States, addressing homelessness is a major challenge and top priority for the City of San Diego (City). To address the growth of homelessness, regulations like the City's Unsafe Camping Ordinance (Ordinance) have become common across California. The 10 most populated cities in California and all 18 cities in San Diego County (County) have adopted regulations on camping in public spaces as part of their efforts to address homeless encampments. Additionally, in July 2024, the Governor of California signed an executive order directing State agencies to adopt policies that address encampments on State of California (State) property and encouraged local agencies to adopt similar policies. The State also requires that applicants for Homeless Housing, Assistance, and Prevention grant funding, which includes the City of San Diego, have policies related to addressing unsheltered homelessness, including encampments.

When the Ordinance was adopted, many stakeholders were uncertain of its potential consequences, such as if more people would accept or enter shelter, or if encampments would be pushed into other areas of the City, remote locations, or far from services. When the Ordinance was proposed at the City Council, more than 200 members of the public provided comments on the item. Our office also received several requests from City Councilmembers to audit the City's activities related to the Ordinance and other topics related to homelessness. We incorporated these concerns into our Citywide annual risk assessment. Based on the results of that assessment, we conducted a performance audit of the City's response to homeless encampments since the adoption of the Unsafe Camping Ordinance in accordance with the Office of the City Auditor's (OCA) Fiscal Year (FY) 2025 Audit Work Plan. The objectives of this audit were to:

1. Determine if the City efficiently and effectively uses its resources to respond to homeless encampments since the adoption of the Unsafe Camping Ordinance; and
2. Determine if the City's personal property storage and disposal processes in relation to the Unsafe Camping Ordinance are practiced equitably.

To achieve this, we reviewed the City's activities in the two years before and the two years after the Ordinance's adoption, which spans from FY2022 through FY2025, and addressed five questions related to the City's response to encampments.

Homelessness in the City is consistent with County and State trends.

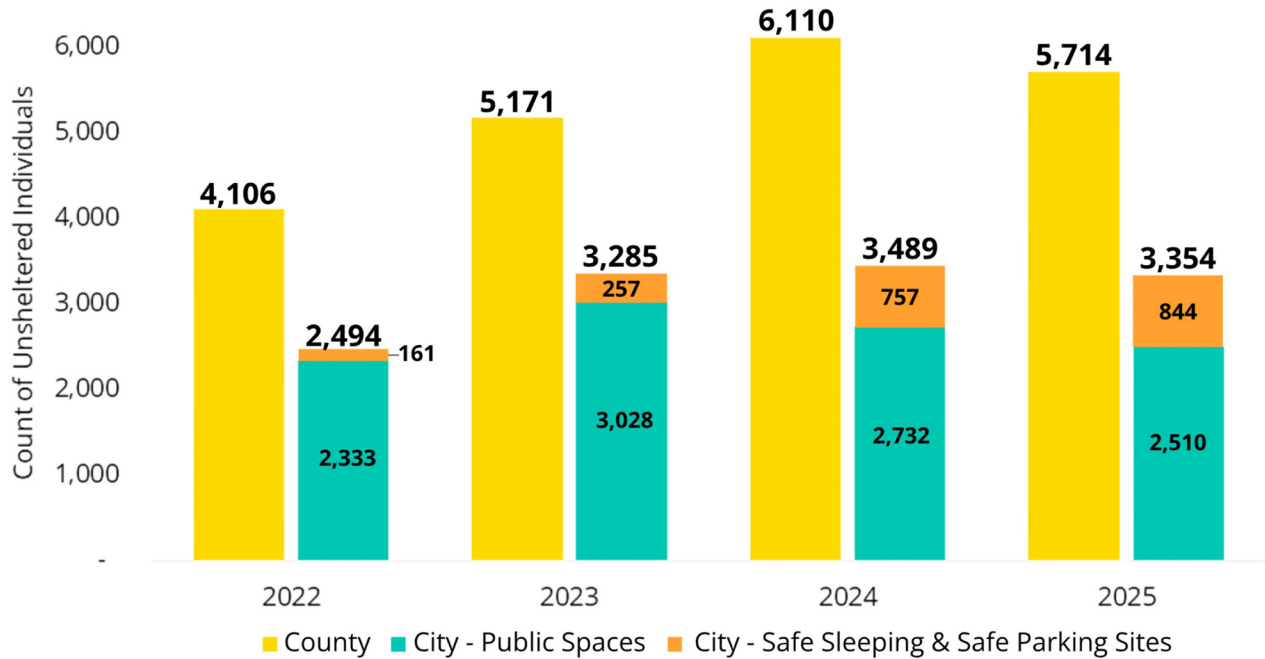
The Ordinance applies to unsheltered individuals living in encampments on public property.

Homelessness across the State, the County, and the City increased from 2022 through 2024, and decreased in 2025. Homelessness encompasses various sleeping conditions and people who become homeless may be sheltered or unsheltered. Sheltered individuals are likely to stay in some form of emergency shelter or transitional housing. Those who are unsheltered may sleep on the street, in vehicles, or in an encampment. The Ordinance applies to unsheltered individuals living in encampments on public property. The majority of our analysis in this audit did not include individuals sleeping in vehicles or in the City's safe parking sites because vehicle habitation is distinct from encampments in the City's Municipal Code. However, to determine the annual changes of the unsheltered homeless population in public areas, we included the counts of people staying at safe parking sites in our analysis.

Homelessness increased across the State from 2022 through 2024, and decreased in 2025, according to preliminary data. Similarly, the annual count of unsheltered individuals, which is shown in **Exhibit 1**, increased by 40 percent in the City from 2022 through 2024, to a high of 3,489 individuals. During the same time period, the count of unsheltered individuals increased by 49 percent in the County, to a high of 6,110 individuals. In 2025, the number of unsheltered individuals decreased by 4 percent in the City and by 6 percent in the County, which is consistent with the reported State-wide decrease of 9 percent. The primary drivers for these overall decreases in 2025 are unclear but, according to the Regional Task Force on Homelessness, decreases in the County could be related to notable decreases in unsheltered veteran and family homelessness due to regional and local investments related to veterans, families, and those needing financial assistance.

Exhibit 1

The City’s and County’s Unsheltered Populations Decreased in 2025 After Peaking in 2024



Note: The City’s unsheltered counts include individuals on Caltrans property within the City’s boundaries from 2023 through 2025.

Source: OCA generated using annual Point-in-Time Count reports from the Regional Task Force on Homelessness and count data for the City’s safe sleeping and safe parking sites provided by the City’s Homelessness Strategies & Solutions Department.

The State, County, and City each have responsibilities related to homelessness.

The State operates various programs and services focused on homelessness, housing, and services that those experiencing or at risk of experiencing homelessness may be eligible for. The State’s Department of Housing and Community Development awards loans and grants for the creation and preservation of affordable rental and ownership homes, permanent supportive housing, and shelter. The State also offers resources that those experiencing or at risk of homelessness may be eligible for, such as:

- CalFresh, which is a program that provides low-income households with monthly benefits to buy food;
- CalWORKS, which is a County-operated program that provides cash aid and services to families in need; and
- Medi-Cal, which offers no-cost or low-cost health coverage.

The County also operates programs related to homelessness, such as those run by its Office of Homeless Solutions, which focus on collaborative and coordinated outreach, case management services, and implementing programs that serve specialized populations experiencing or at risk of homelessness. The County also connects individuals with services they may be eligible for, such as:

- General Relief, a County-operated program that provides temporary cash aid;
- Mental health and substance use care through outpatient and support services, crisis services, hospital-level care, and residential and long-term services; and
- Other resources like CalFresh, CalWORKS, and Medi-Cal.

City departments divide responsibilities related to homelessness.

In addition to the State and County, the City also responds to issues related to homelessness. The majority of the City's homelessness programs are funded through its Homelessness Strategies and Solutions Department (HSSD). HSSD aims to prevent and end homelessness by providing services to ensure individuals experiencing homelessness achieve housing stability and long-term success. To provide a coordinated approach to addressing issues related to homelessness, HSSD works with several regional partners, including the San Diego Housing Commission (SDHC). SDHC is the City's public housing agency and is overseen by the San Diego Housing Authority, which consists of the nine members of the City Council. Most of the City's homelessness programming is administered by SDHC alongside other regional partners and providers. These programs are funded through HSSD by the City's General Fund, State grants, and other funds, which largely consist of federal support for housing vouchers and permanent supportive housing services, as well as funds allocated by SDHC, as governed by the City Council. According to the City's Independent Budget Analyst, in FY2026, the City allocated \$280.7 million for homelessness programs.

In addition to HSSD, other City departments are responsible for activities related to homelessness, such as addressing homeless encampments. The San Diego Police Department's (SDPD) Neighborhood Policing Division (NPD) responds to issues related to homelessness through proactive patrolling, responding to calls, offering access to services, addressing complex cases involving

substance use or mental health issues among individuals experiencing homelessness, and responding to Get It Done encampment reports. In FY2025, NPD expended \$25.7 million.

The City's Environmental Services Department (ESD) manages waste abatement, which includes abating encampments through its Clean SD Division. Clean SD staff manage waste removal, sidewalk sanitation, and curbside community cleanups; respond to illegal dumping reports; and conduct encampment abatements on streets and sidewalks, in the San Diego riverbed, and in canyons. In FY2025, Clean SD expended \$19.4 million.

The Unsafe Camping Ordinance aims to reduce encampments on public property and encourage the use of available shelter.

The Ordinance states that certain public lands pose significant health and safety hazards to the people who stay overnight in these areas.

The City's Ordinance was signed into law on June 29, 2023, and amended the San Diego Municipal Code related to unauthorized encampments on public property. The purpose of the Ordinance states that the City finds that certain public lands within the City pose significant health and safety hazards to the people who make shelter or stay overnight in these areas. Additionally, some of these lands are environmentally sensitive and may be significantly damaged by unregulated human activity. It also notes that the City is committed to protecting the rights of individuals who cannot obtain shelter and to treating their personal property with respect and consideration. The Ordinance's preamble states that there are also certain areas with elevated health and safety risks to the public and those living in encampments, such as K-12 schools, shelters, parks, and along trolley tracks and transportation hubs.

According to the Mayor, the Ordinance strikes a balance between supporting the most vulnerable and getting them the care they need and maintaining safety and quality of life for all residents. Additionally, City Council District 3 stated the primary goal of the Ordinance was to reduce exposure to unsafe conditions both for people in encampments and other members of the public.

The Ordinance outlines when and where it is illegal to set up unauthorized encampments on public property, how the City may enforce violations of the Ordinance, and how the City may abate

unauthorized encampments on public property.¹ If shelter is available, encampments are prohibited on any public property. The Ordinance also describes locations where encampments are prohibited regardless of shelter availability, which are:

- Within two blocks of a school that has posted signs prohibiting camping;
- Within two blocks of any shelter that has posted signs prohibiting camping;
- In any open space, waterway, or banks of any waterway;
- Within any transit hub, trolley platform, or trolley tracks where signs are posted prohibiting camping; and
- In any park that the City Manager determines there is a substantial public health and safety risk, where signs are posted prohibiting camping.

In locations where enforcement relies on signage, which include schools, shelters, parks, and transit hubs, platforms, and tracks, the City has posted signs prohibiting camping, as shown in **Exhibit 2**.

Exhibit 2

The City Has Posted Signs Prohibiting Camping in Certain Areas Where Encampments Are Prohibited Regardless of Shelter Availability



Source: Photos taken by OCA.

¹ Encampments on private property are addressed using a separate process, and do not fall under the provisions of the Ordinance.

While unauthorized encampments on public property were already prohibited, the Unsafe Camping Ordinance marked a shift in the City's approach.

The activities the Ordinance prohibits overlap with those prohibited by other quality-of-life laws, which SDPD officers already enforced. Specifically, the San Diego Municipal Code already prohibited encroachment, which is when someone establishes themselves on any public property or public right-of-way, and prohibited temporary shade structures in parks.² Additionally, the California Penal Code makes it a misdemeanor for a person to lodge in any public or private building, structure, vehicle, or place without the owner's permission, which is referred to as illegal lodging.³ According to SDPD, prior to the Ordinance, officers typically enforced illegal lodging or encroachment in cases of encampments on public property.

The City opened its first of two safe sleeping sites in June 2023 and opened its second safe sleeping site in October 2023.

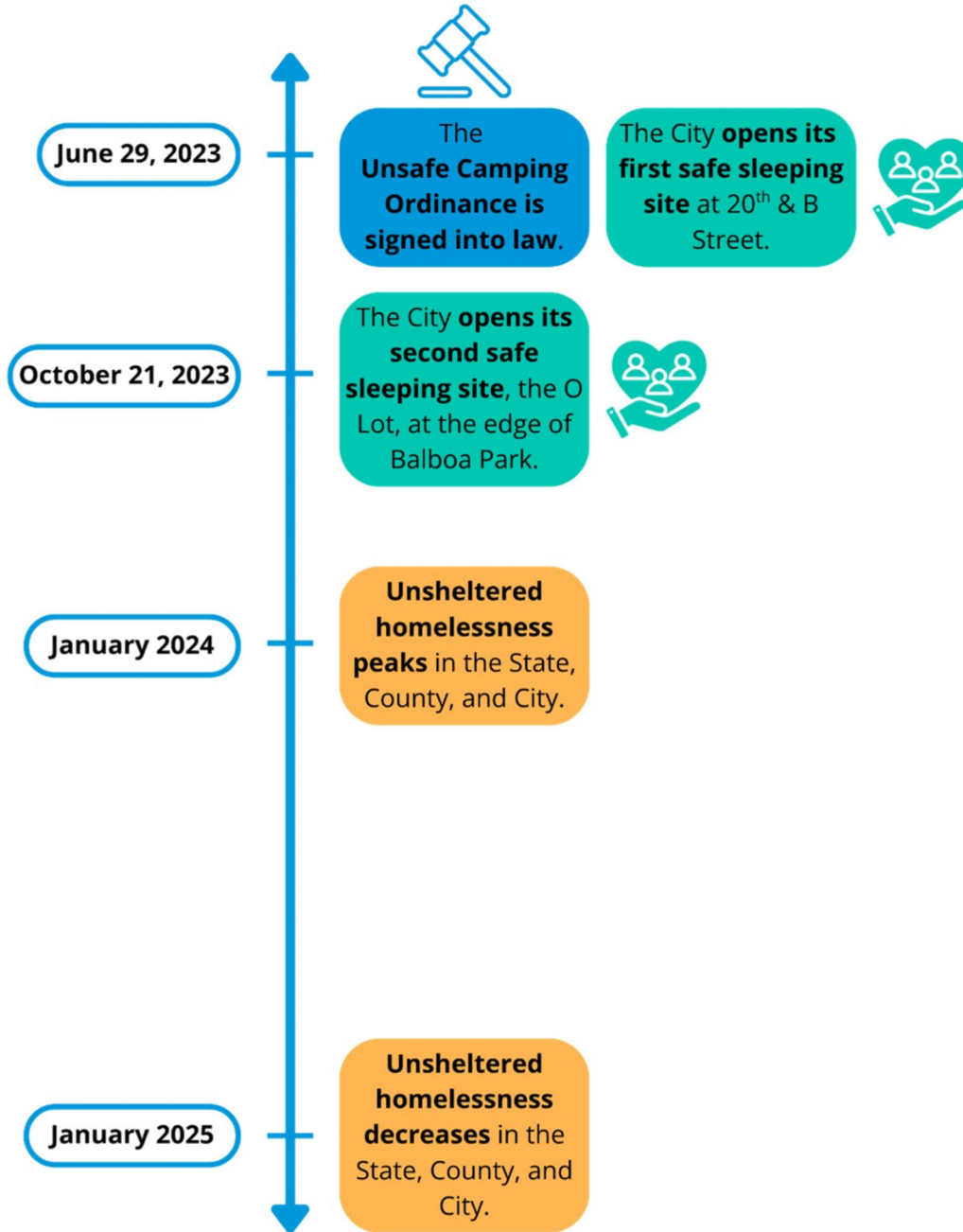
While the Ordinance did not change which activities became prohibited on public property, it did mark a shift in the City's approach to unsheltered homelessness. In conjunction with passing the Ordinance, the City opened its first of two safe sleeping sites in June 2023 and opened its second safe sleeping site in October 2023, as shown in **Exhibit 3**. These facilities provide legal campgrounds for the unsheltered population, as well as tents, meals, restrooms, showers, 24-hour security, case management, and other resources. While these sites, along with the City's safe parking sites, are not recognized as formal shelter by the U.S. Department of Housing and Urban Development for the purposes of counting unsheltered people, according to the Mayor's Office, these sites address a critical gap in the current shelter system by providing secure locations for people to sleep in their vehicles and tents. HSSD also stated that, while the City offers multiple shelter options which may assist people in accessing housing, its safe sleeping sites fit some people's personal preferences. Additionally, according to SDPD, these sites provide an important low barrier stepping stone that allows individuals to access resources they otherwise would not have if they were unsheltered on the street, while also reducing illegal encampments.

² San Diego Municipal Code prohibits encroachment in section 54.0110 and prohibits temporary shade structures in parks in section 63.0102(c)(12).

³ California Penal Code section 647(e).

Exhibit 3

The City Opened Its First of Two Safe Sleeping Sites When It Passed the Ordinance



Source: OCA generated using information from the Unsafe Camping Ordinance, public press releases from the Mayor's Office, State of California homeless population count data from the U.S. Department of Housing and Urban Development, public press releases from the Governor's Office, and Point-in-Time Count data from the Regional Task Force on Homelessness.

The Ordinance also formalized changes to ESD's abatement procedures, which are discussed further in **Question 5**. Previously, City procedures typically required three hours of notice prior to abatements for people to remove their belongings. With the adoption of the Ordinance, this typical notice period extended to a minimum of 24 hours, reducing the number of items requiring storage and the risk that valued items are disposed of.

Given how the Ordinance marked a shift in the City's approach to homelessness, **Question 1** will further discuss how the number of unsheltered individuals has changed in the City since the Ordinance's adoption.

Audit Results

Overall, we found that the City of San Diego (City) coordinated its resources to respond to homeless encampments in alignment with the adoption of the Unsafe Camping Ordinance (Ordinance).

However, systemwide resource challenges limit the City's ability to further reduce unsheltered homelessness. Further, based on best-available data and our analyses, we found a reduction in the number of people living in public areas. We were unable to determine the specific geographic movement of the homeless population within the City.

We also found the City's abatement storage procedures generally align with best practices, but that language accessibility and procedures could be improved.

We addressed the following five questions related to the City's response to encampments, and the detailed analyses follow in the body of this report.

Question 1: Did the unsheltered population decrease in the City of San Diego since the implementation of the Unsafe Camping Ordinance?

Based on the best-available data and our analysis, the unsheltered population, as defined by the U.S. Department of Housing and Urban Development, did not decrease across the City since the implementation of the Ordinance.⁴ However, the Ordinance and the opening of the City's safe sleeping sites appear to have reduced the number of people living in public areas.

⁴ The unsheltered population continuously fluctuates in size and geographic location. Therefore, there are limitations in the available data of the unsheltered population in the City of San Diego. Our audit reviewed and analyzed data from several sources that attempt to quantify the size of the unsheltered population in the City. Questions 2 through 4 discuss the results of these analyses. Our audit scope analyzed the available data from FY2022 through FY2025.

Question 2: Did the unsheltered population move from downtown to other areas of the City of San Diego after the implementation of the Unsafe Camping Ordinance?

We were unable to determine the specific geographic movement of the homeless population within the City. The safe sleeping sites increased the City's capacity for more stable living options. While many people from downtown likely transitioned to safe sleeping sites, the decrease in the unsheltered population downtown is greater than the capacity of the safe sleeping sites. Therefore, some people likely moved to other areas of the City; however, the rate of reports of encampments outside of downtown did not significantly increase after the Ordinance, based on best-available data. We note that data limitations prevent a more precise geographic analysis of the unsheltered population.

Question 3: Did the number of citations, arrests, and prosecutions for encampments increase after the Unsafe Camping Ordinance?

Based on best-available data and our analyses, after the implementation of the Ordinance, SDPD had more contacts with the unsheltered population for encampments, specifically in Fiscal Year (FY) 2025. While the proportion of contacts resulting in citation or arrest did not significantly increase, the number of contacts that resulted in arrests in FY2025 nearly doubled, which is consistent with SDPD's progressive enforcement model.

Question 4: Did City departments work and coordinate in their response to encampments after the implementation of the Ordinance, in accordance with the goals in the preamble of the Ordinance?

We found that City departments adhered to the intentions of the preamble of the Ordinance of protecting public health, safety, and the City's natural resources. City departments coordinated their efforts, prioritized encampment responses based on risk, and decreased response times to encampments after the implementation of the Ordinance.

Question 5: Does the City equitably store personal items from abatements?

While we did not find a pattern of concerns related to item storage, we found that certain improvements regarding language accessibility and property handling procedures would better ensure that the process is as accessible and clear as possible to ensure those impacted by abatements may retrieve their personal property. Additionally, the City's extension of its notice period prior to abatements provided people more time to remove their belongings from encampments.

The City's item storage procedures generally align with best practices. While the City does dispose of some items that best practices recommend, it has a reasonable process for determining which items it will not store.

Question 1:

Did the unsheltered population decrease in the City of San Diego since the implementation of the Unsafe Camping Ordinance?

Based on the available data and our analysis, the unsheltered population, as defined by the U.S. Department of Housing and Urban Development (HUD), did not decrease across the City of San Diego (City) since the implementation of the Unsafe Camping Ordinance (the Ordinance).⁵ However, the Ordinance and the opening of the City's safe sleeping locations appear to have reduced the number of people living in public areas. As discussed below, HUD does not define the City's safe sleeping and safe parking programs as shelters; however, these sites do provide additional services to the homeless population, including security, bathrooms, and access to other services.

After the implementation of the Ordinance in July 2023, the 2024 Point-in-Time Count showed a 6 percent increase in the unsheltered population in the City, compared to 2023.⁶ However, in the following year, 2025, the Point-in-Time Count showed a 4 percent decrease in the unsheltered population, compared to 2024.⁷ **Exhibit 4** shows the change in the results of the Point-in-Time Count before the implementation of the Ordinance, fiscal year (FY) 2022 and FY2023, and after implementation, FY2024 and FY2025.

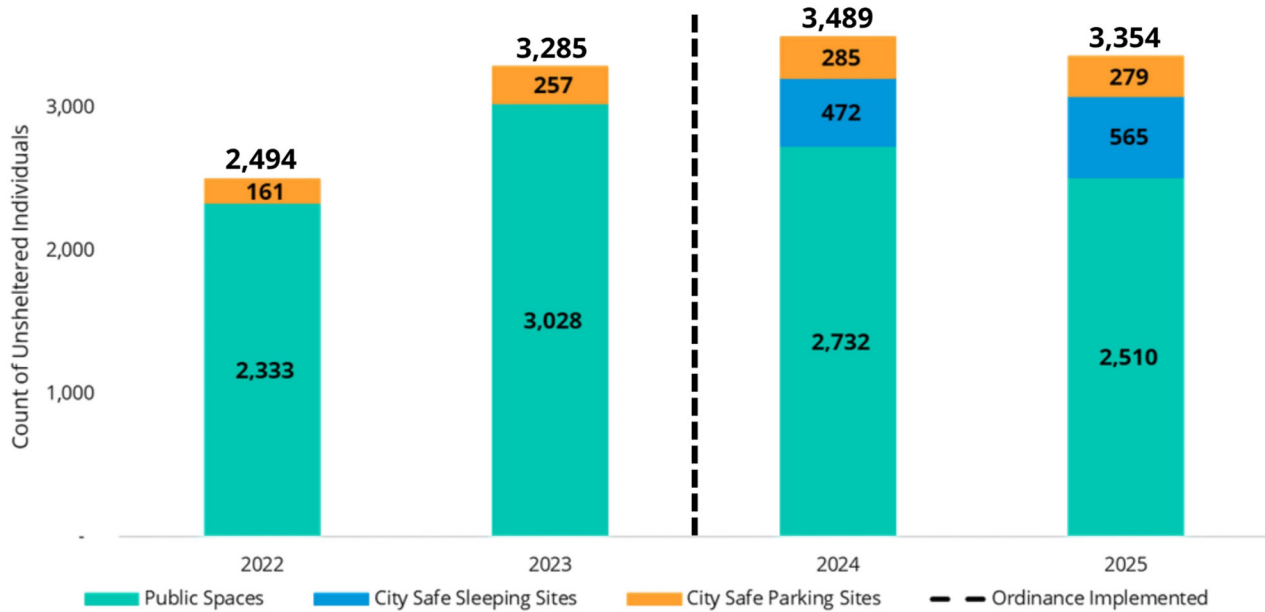
5 The unsheltered population continuously fluctuates in size and geographic location. Therefore, there are limitations in the available data of the unsheltered population in the City of San Diego. Our audit reviews and analyzes data from several sources that attempt to quantify the size of the unsheltered population in the City. Question 2 discusses the results of these additional analyses. Our audit scope analyzed the available data from FY2022 through FY2025.

6 HUD mandates a once-a-year Point-in-Time Count in order to estimate the size of the sheltered and unsheltered populations on a single night, typically in January.

7 The 2025 Point-in-Time Count showed a 14 percent decrease in both sheltered and unsheltered homelessness across the City, compared to the 2024 count.

Exhibit 4

The HUD-Defined Unsheltered Population in the Annual Point-in-Time Counts Did Not Decrease After the Implementation of the Unsafe Camping Ordinance in July 2023, but Safe Sleeping Encouraged Many People Away from Public Areas



Note: Totals include counts on Caltrans property within the City’s boundaries for 2023 through 2025. Prior to 2023, the annual Point-In-Time Count did not include people on Caltrans property. Therefore, the 2022 results are likely undercounted.

Source: OCA generated using the Regional Task Force on Homelessness’ 2022 through 2025 annual Point-In-Time Count reports.

The Regional Task Force on Homelessness describes the Point-in-Time Count as an unduplicated count on a single day of the people in a community who are experiencing homelessness that includes both sheltered and unsheltered populations. Our analysis examined only the counts of unsheltered populations; we did not review the counts of people in shelters. The Point-in-Time Counts reflect the minimum number of unsheltered individuals that volunteers identify on one day each year, as some people may be in remote locations or hard to reach. Also, because these counts are snapshots in time, the counts do not factor in any variability that occurs throughout the year.

Of note, the Point-in-Time unsheltered counts include people staying in the City’s safe sleeping and safe parking locations because HUD defines unsheltered homelessness as people sleeping in unhooded areas not designed or ordinarily used as regular sleeping accommodations. The City’s first safe sleeping site opened in June 2023, and the second site opened in October 2023. Therefore, the

2024 unsheltered count included 472 people staying at the City's safe sleeping sites and the 2025 unsheltered count included 565 people staying at the City's safe sleeping sites, as shown in **Exhibit 4**. Notably, with the opening of the safe sleeping sites, the Point-in-Time Counts showed a decrease in the number of people staying in public areas. The unsheltered population staying in public areas decreased in the 2024 Point-in-Time Count by almost 10 percent, compared to 2023. The number decreased again by about 8 percent in 2025. City departments shared that along with the existing housing options, these safe sleeping sites provided a new opportunity of low barrier lodging that connected hundreds of people to resources and support.

The Ordinance and safe sleeping sites helped reduce the number of people living in public spaces; however, external factors impact the City's ability to provide more shelters.

Ongoing financial challenges limit the City's ability to provide more shelter options in the City.

Ongoing financial challenges limit the City's ability to provide more shelter options in the City. While the City's safe sleeping and safe parking locations provide space for people to temporarily transition away from the City's streets and public spaces, they are not designed for regular sleeping accommodations, like shelters. However, the City's overall budget constraints limit shelter bed expansion. The City also faces ongoing uncertainty about the status of future federal and State funding for homelessness programs. Meanwhile, the affordable housing crisis impacts cities across California, including San Diego, because of the limited low-income and affordable housing options.

Question 2:

Did the unsheltered population move from downtown to other areas of the City of San Diego after the implementation of the Unsafe Camping Ordinance?

We were unable to determine the specific geographic movement of the homeless population within the City of San Diego (City) as a result of the implementation of the Unsafe Camping Ordinance (Ordinance). The safe sleeping sites increased the City's capacity for more stable living options. While many people from downtown likely transitioned to safe sleeping sites, the decrease in the unsheltered population downtown is greater than the capacity of the safe sleeping sites. Therefore, some people likely moved to other areas of the City; however, the rate of reports of encampments outside of downtown did not significantly increase after the Ordinance. Also, data limitations prevent a more precise geographic analysis of the unsheltered population.

Monthly census counts showed a substantial decrease in the unsheltered population downtown after the implementation of the Ordinance.

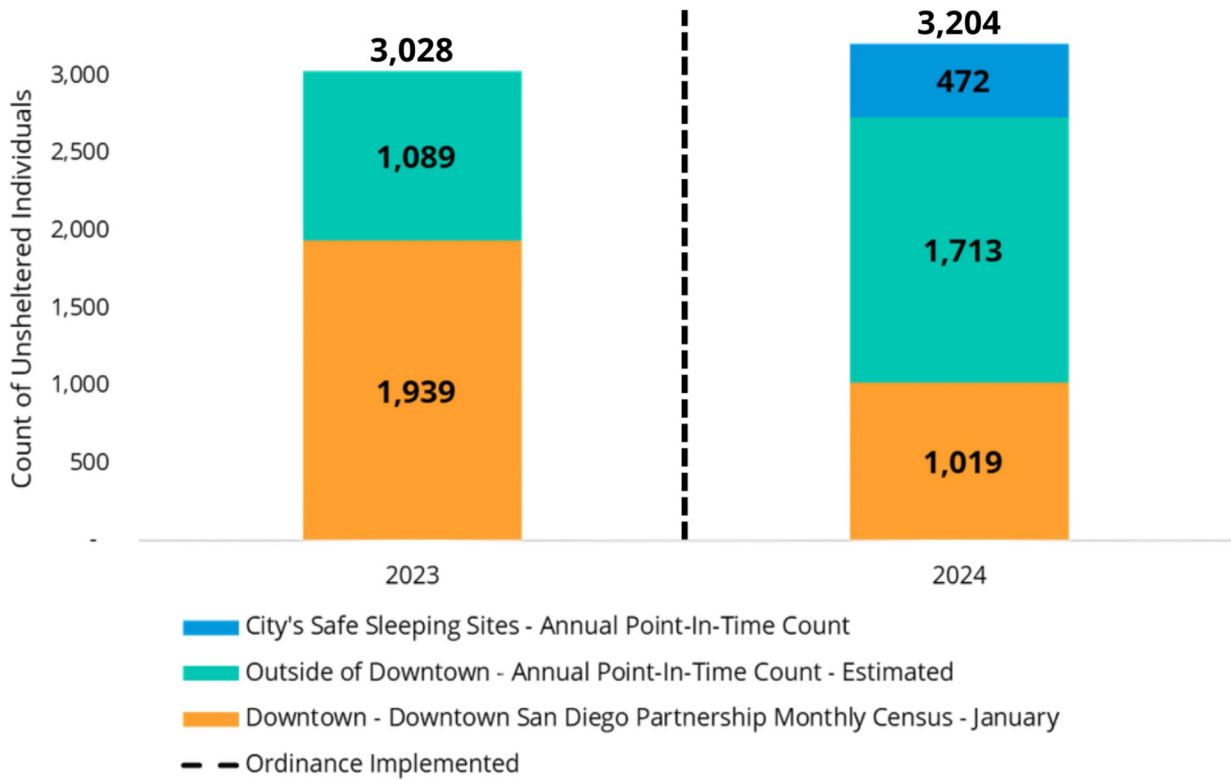
Following the implementation of the Ordinance, the Downtown San Diego Partnership's monthly census counts found a substantial decrease in the number of unsheltered people downtown. The median monthly count of unsheltered individuals, including people in vehicles, increased from 1,289 in fiscal year (FY) 2022 to 1,721 in FY2023. However, after the implementation of the Ordinance, in FY2024, the monthly median count decreased to 1,041 unsheltered individuals and decreased again in FY2025 to a monthly median of 850 unsheltered individuals.

It is likely that along with existing shelter options, many unsheltered people downtown transitioned to the City's safe sleeping sites.

With the implementation of the Ordinance, the City's two safe sleeping sites near downtown opened in late June 2023 and in October 2023 and their occupancy increased throughout FY2024 and FY2025. It is likely that along with existing shelter and housing options, many unsheltered people downtown transitioned to the City's safe sleeping sites. As shown in **Exhibit 5**, after the passing of the Ordinance and the opening of the safe sleeping sites, the 2024 January Point-in-Time Count found the number of people staying in public spaces decreased by 296 compared to the 2023 January count. Meanwhile the 2024 Point-in-Time Count found 472 people staying at the City's two safe sleeping sites. However, the Downtown San Diego Partnership's census counts showed a decrease of 920 unsheltered people in January 2024 compared to January 2023. Therefore, some people likely moved from downtown to other areas.

Exhibit 5

After the Implementation of the Ordinance and the Opening of Safe Sleeping Sites, a Significant Portion of the Downtown Unsheltered Population Likely Moved to the Safe Sleeping Sites and Other Areas



Note: We estimated the size of the unsheltered population outside of downtown at the time of the annual Point-in-Time Count by subtracting the Downtown San Diego Partnership's downtown census count for the month of January from the results of the unsheltered annual Point-in-Time Count results. Of note, the Downtown San Diego Partnership stated its census count excludes some areas of downtown. Also, its census counts use a 1.75 occupancy multiplier for visible tents or structures and a 2.03 occupancy multiplier for vehicles that show signs of habitation. The results of the annual Point-in-Time Counts do not include these occupancy multipliers.

Source: OCA generated based on monthly census count data published by the Downtown San Diego Partnership and published annual Point-in-Time Count data.

Limited data restricts the ability to determine the unsheltered populations' movements across the City.

Determining the size and locations of the unsheltered population is challenging as individuals continuously move and often seek refuge in locations away from the public.

Determining the size and locations of the unsheltered population is challenging as individuals continuously move and often seek refuge in locations away from the public. While the Regional Taskforce on Homelessness (RTFH) publishes Citywide results for the annual Point-in-Time Count and has census tract level data for 2024 and 2025, census tract level data is not available for 2022 and 2023. Therefore, we could not determine if the unsheltered population shifted significantly across the City, based on annual Point-in-Time Counts.

These challenges with homelessness data exist across California and nationwide. Consequently, along with the data from the Downtown San Diego Partnership, we analyzed data from the San Diego River Park Foundation, the San Diego Housing Commission's (SDHC) Coordinated Intake Shelter Program data, as well as the City's Get It Done encampment report data. We also interviewed various stakeholders for their perspectives on whether encampments and the unsheltered population moved after the implementation of the Ordinance. We found that some people likely moved away from downtown to other areas of the City after the implementation of the Ordinance. However, there was not a significant increase of encampment reports outside of downtown after the implementation of the Ordinance.

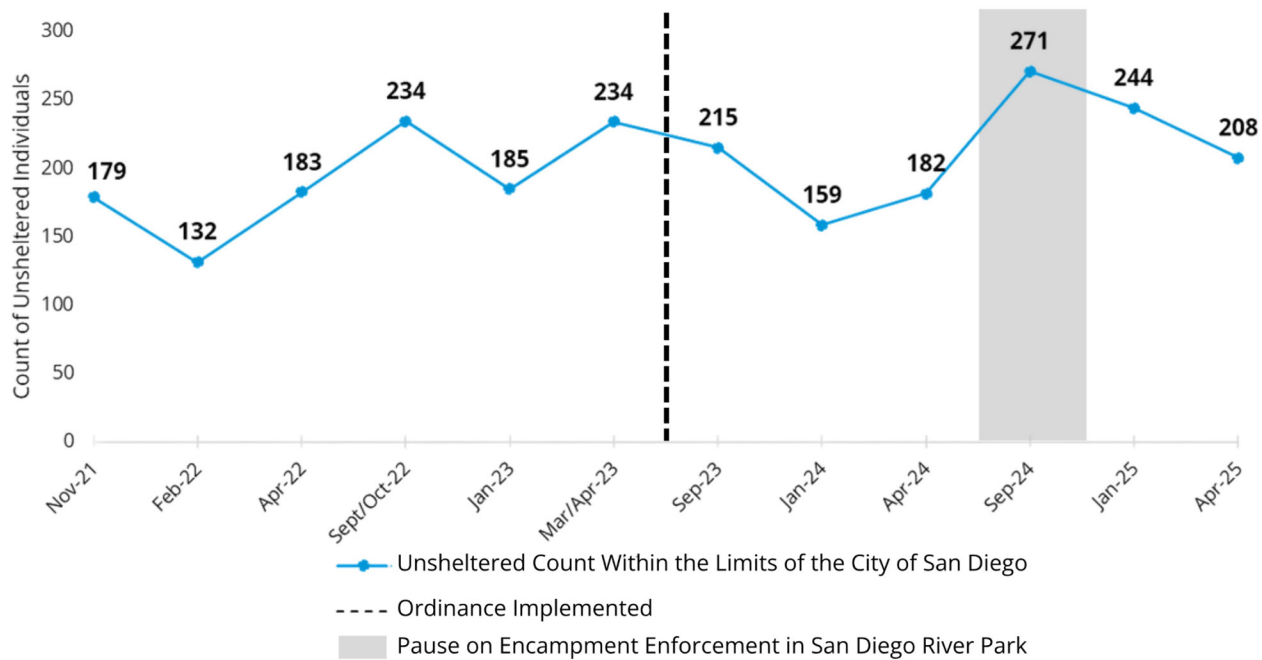
The unsheltered population in the San Diego River Park peaked a little over a year after the implementation of the Ordinance.

Before the implementation of the Ordinance, the unsheltered population was slightly increasing within the City limits of the San Diego River Park.⁸ After the Ordinance was implemented in July 2023, the results of the San Diego River Park Foundation's unsheltered census counts show that the unsheltered population continued to slightly increase, as shown in **Exhibit 6**.

⁸ The San Diego River Park Foundation stated that the size of the unsheltered population in the San Diego River Park tends to change seasonally, with decreases in the winter months.

Exhibit 6

The Size of the Unsheltered Population in the San Diego River Park Peaked in September 2024, a Little Over a Year After the Implementation of the Ordinance



Note: From July 2024 through October 2024, there was a pause on the enforcement of encampments in areas with the highest number of encampments in the San Diego River Park, according to the San Diego River Park Foundation, due to dedicated outreach funded by California's Encampment Resolution Funds. Also, the San Diego River Park Foundation stated that the size of the unsheltered population in the San Diego River Park tends to change seasonally, with less people in the area during winter months. The San Diego River Park Foundation uses a multiplier of 1.75 people for each hand-built structure found to estimate the number of people associated with hand-built structures.

Source: OCA generated based on census count data of the unsheltered population within the City limits, not including those residing in vehicles, provided by the San Diego River Park Foundation.

Notably, the greatest increase in the unsheltered population in the San Diego River Park after the implementation of the Ordinance occurred when the City was not enforcing or abating encampments due to the terms of the Encampment Resolution Funds grant. At that time, the City provided enhanced outreach and support to enter shelter and housing. After this period, the count decreased with each census count, and the most recent unsheltered count found a significant decrease in the number of unsheltered people within the City limits of the San Diego River Park. The January 2026 Point-in-Time Count found 105 unsheltered people within the City limits of the San Diego River Park, almost half of the 208 people in the last census count of our review period, April 2025.⁹

⁹ This count excludes inhabited vehicles.

Outreach providers, the RTFH, and City departments report seeing marginal movements of the unsheltered population.

People often return to locations after encampment abatements.

One of the City's two contracted outreach partners said that initially after the implementation of the Ordinance, some unsheltered populations shifted from downtown to other areas of the City, including more dangerous areas, such as freeways and the San Diego riverbed. However, both providers said that more recently, people seemed to have returned to downtown. Additionally, an outreach provider and ESD stated that unsheltered populations typically move to different locations due to the City's enforcement and abatement procedures. They also stated that people often return to previous locations after encampment abatements. ESD also noted that it is uncommon to receive a report of an encampment in an unfamiliar location.

Furthermore, RTFH stated that after the implementation of the Ordinance, there appeared to be small movements of people out of downtown to more remote areas and to California Department of Transportation (Caltrans) property. Councilmember offices also reported seeing shifts to Caltrans property. RTFH also noted that typically when a city enacts a camping ban, people do not leave the jurisdiction but rather move to less safe areas.

Due to reports that abatements moved to Caltrans property after the implementation of the Ordinance, the City signed an agreement with Caltrans to allow the City to respond to abatements on Caltrans property.

After the implementation of the Ordinance, media reported encampments moving to Caltrans property, where the City could not enforce, abate, or provide outreach. ESD also stated that in the later part of FY2024 and the start of FY2025, Caltrans did not have a permanent contractor to conduct abatements on Caltrans property. Therefore, according to HSSD, SDPD, and ESD, the City established an agreement with Caltrans in FY2026 to allow its departments and contracted outreach providers to respond to encampments on a 5-mile stretch of Caltrans property alongside State freeways.

The annual Point-in-Time Counts do not show a large shift in movement to Caltrans properties. Compared to 2023, the 2024 Point-in-Time Count identified a decrease of 27 people on Caltrans property within the boundaries of the City. According to ESD, the 2024 Point-in-Time Count occurred just as Caltrans lost a permanent contractor for abatements. The 2025 Point-in-Time Count also found a decrease of

104 people on Caltrans property within the boundaries of the City. ESD stated that Caltrans acquired a new permanent contractor in fall of 2024, before the 2025 Point-in-Time Count occurred.

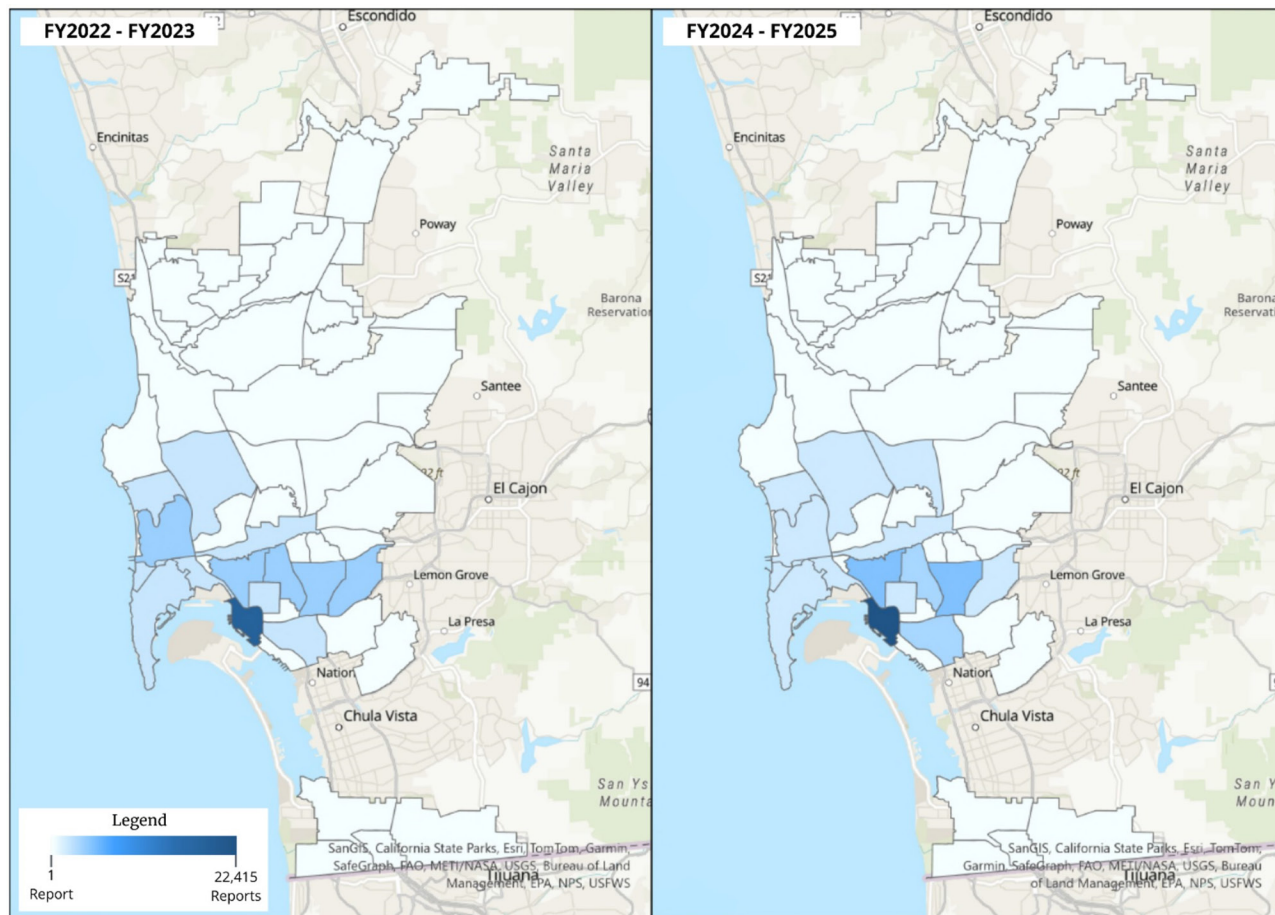
Reported encampment locations did not significantly change after the implementation of the Ordinance.

Locations of Get It Done encampment reports did not significantly change after the implementation of the Ordinance. It is important to note that an increase in the number of Get It Done encampment reports does not necessarily mean that the number of encampments increased. An increase could suggest that the public and City staff submitted Get It Done encampment reports more often, such as each time an encampment moved to a new location, due to the City's expanded focus on responding to encampments after the implementation of the Ordinance.

When comparing the two years before the implementation of the Ordinance, FY2022 and FY2023, to the two years after, FY2024 and FY2025, downtown received 6,938 more Get It Done encampment reports, a 45 percent increase. The increase in downtown was the largest across the City's 55 total community planning districts, as shown in **Exhibit 7**.

Exhibit 7

Encampment Reports Were Primarily Concentrated in the Same Community Planning Districts During the Two Fiscal Years Before the Ordinance (Left) and During the Two Fiscal Years After (Right)



Note: Maps exclude data on duplicate reports made for the same encampment. See **Appendix D** for the total number of Get It Done encampment reports by community planning district included in each map.

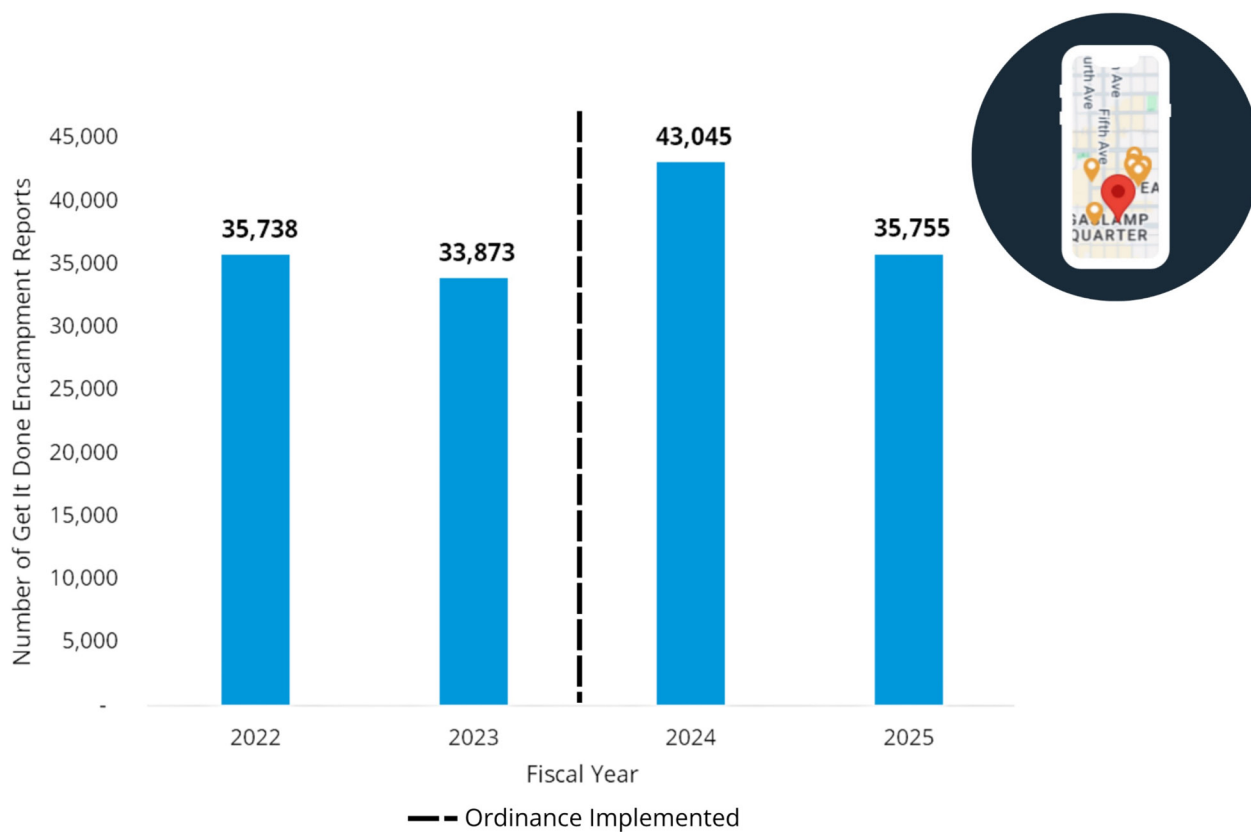
Source: OCA generated using Get It Done encampment report data and community planning district data from the City's Open Data Portal.

The three community planning districts that had the largest increases in the number of submitted Get It Done encampment reports were Downtown (6,938 more reports), Uptown (752 more reports), and Southeastern San Diego (576 more reports). Alternatively, the three community planning districts that had the largest decreases in the number of submitted Get It Done encampment reports were Mid-City Eastern Area (1,291 fewer reports), Mission Bay Park, (994 fewer reports), and Balboa Park (839 fewer reports).

Even though the City saw an increase in Get It Done encampment reports in the two years after the Ordinance was implemented, the total number of reports submitted Citywide peaked in FY2024 at 43,045. The total number then decreased to 35,755 reports in FY2025, which is about the same number of reports submitted prior to the Ordinance in FY2022 at 35,738, as shown in **Exhibit 8**.

Exhibit 8

Citywide Encampment Reports Peaked in FY2024 and Decreased to Pre-Ordinance Levels in FY2025



Note: Totals include only reports that had Community Planning District names listed. We excluded reports with blank values, 'Reserve,' and 'RESERVE AREA' listed in the Community Planning District name field.

Source: OCA generated using Get It Done encampment report data from the City's Open Data Portal.

The number of encampment reports did not appear to substantially change around schools, parks, open spaces, and shelters with Ordinance signs.

Based on the available data and our analyses, the number of Get It Done encampment reports did not systematically decrease or increase when the City posted Ordinance signs near schools or shelters, or within parks or open spaces. As explained in the **Background**, camping and encampments are prohibited at locations with Ordinance signs, regardless of shelter availability. For instance, 36 schools received Ordinance signage. Of those 36 schools, the number of Get It Done encampment reports decreased near 19 schools (53 percent) in the 6 months after receiving signs, compared to the 6 months before the City posted signs.¹⁰ Meanwhile, the other 17 schools (47 percent) saw increases in reported encampments after receiving Ordinance signs.

All schools that we interviewed stated they still face ongoing challenges of activities associated with unsheltered individuals, even after receiving Ordinance signs.

An increase or decrease in the number of Get It Done encampment reports does not necessarily mean the number of encampments increased or decreased. For instance, the visibility of the Ordinance signs may have influenced people to submit more Get It Done encampment reports. Alternatively, in places where encampments persisted, even with signs and enforcement, people may have stopped submitting as many reports because these actions provide a temporary, rather than permanent, solution. However, all schools that we interviewed stated they still face ongoing challenges of activities associated with unsheltered individuals, even after receiving Ordinance signs. Schools mentioned challenges such as people smoking, using drugs, or consuming alcohol nearby; people defecating on school property; and families feeling it is unsafe to let their children walk to school alone.

Of all types of locations we reviewed, only shelters had a significant decrease in encampment reports. Of the 15 shelters that we reviewed that received Ordinance signs, the number of Get It Done encampment reports decreased near 12 shelters (80 percent) in the 6 months after receiving signs compared to the 6 months before receiving signs. The other 3 shelters (20 percent) saw increases in encampment reports.

¹⁰ We worked with the Department of Performance and Analytics to determine the number of Get It Done encampment reports over time in specific locations using Geographic Information System (GIS). For schools and shelters, these locations included a distance of 0.2 miles from the location of the school or shelter to best correspond with the Ordinance's prohibition of encampments within two blocks from schools and shelters.

Of the 43 parks that we reviewed that received Ordinance signs, the number of Get It Done encampment reports decreased in 24 parks (56 percent) in the 6 months after receiving Ordinance signs compared to the 6 months before receiving signs. While 16 parks (37 percent) saw increases in encampment reports. Meanwhile 3 parks (7 percent) had no change in the number of reported encampments.

Finally, of the 9 open spaces that received Ordinance signage, Get It Done encampment reports decreased in 5 open spaces (56 percent) in the 6 months after receiving Ordinance signs compared to the 6 months before receiving signs. Whereas Get It Done encampment reports increased in 4 open spaces (44 percent).

It is also important to note that the Ordinance signs support the City's enforcement of the Ordinance. SDPD stated that photos of encampments with the signs provide stronger supporting evidence. Also, the Central Library mentioned people at encampments near the library were more willing to move when requested, when the staff pointed to the Ordinance signs. Therefore, while the signs do not appear to have decreased the number of encampments, they are still a beneficial tool for the City.

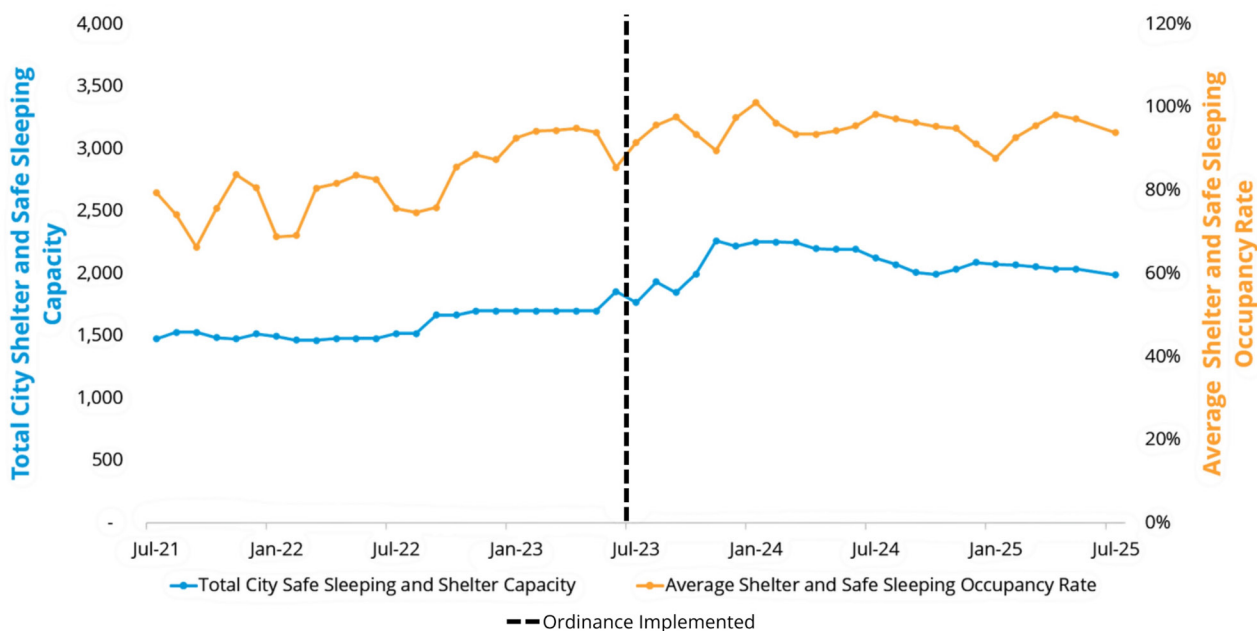
Available City shelter space, including safe sleeping, remained limited after the implementation of the Ordinance.

The Ordinance and department procedures require offering shelter and services during abatements and enforcement contacts.

With the opening of the safe sleeping sites in June and October 2023, the City's total shelter and safe sleeping capacity increased to over 2,200 spaces in November 2023. The Ordinance and City department procedures also require offering shelter and services during abatements and enforcement contacts. However, in FY2025, one of the City's larger shelters, Golden Hall, closed and the Paul Mirabile Center transitioned to dedicated sober living. In anticipation of the loss of these shelter spaces, the City established new shelter opportunities. However, the City's overall capacity for shelter referrals decreased and remained below 2,100 spaces, as shown in **Exhibit 9**. Meanwhile, the average occupancy rates at the City's shelters and safe sleeping sites increased from 77 percent in FY2022 and 87 percent in FY2023 to 95 percent in FY2024 and FY2025, as shown in **Exhibit 9**. Therefore, the passage of the Ordinance and the opening of the safe sleeping sites likely led to the increased use of City shelter and safe sleeping spaces.

Exhibit 9

Occupancy at the City’s Shelters and Safe Sleeping Sites Neared Capacity After the Implementation of the Ordinance, When the Safe Sleeping Sites Opened and After Some Larger Shelters Closed



Note: Occupancy for the safe sleeping sites was calculated as one person per tent, however tents can accommodate two individuals.

Source: OCA generated based off data provided by the San Diego Housing Commission and data provided by the two organizations that manage the City’s safe sleeping sites: Dreams for Change and Downtown San Diego Partnership.

ESD, HSSD, and SDPD shared that the City’s safe sleeping sites significantly impacted the City’s ability to provide designated locations for greater stability. According to HSSD, nearly 80 percent of people who stayed at the safe sleeping sites never previously accessed the shelter system. SDPD shared that although the City’s safe sleeping sites are not permanent shelters or housing, they provide an important low barrier step for the unsheltered population to accept temporary supportive shelter and connect to resources.

After the implementation of the Ordinance, most shelter referrals did not result in shelter placement despite an increase in referrals.

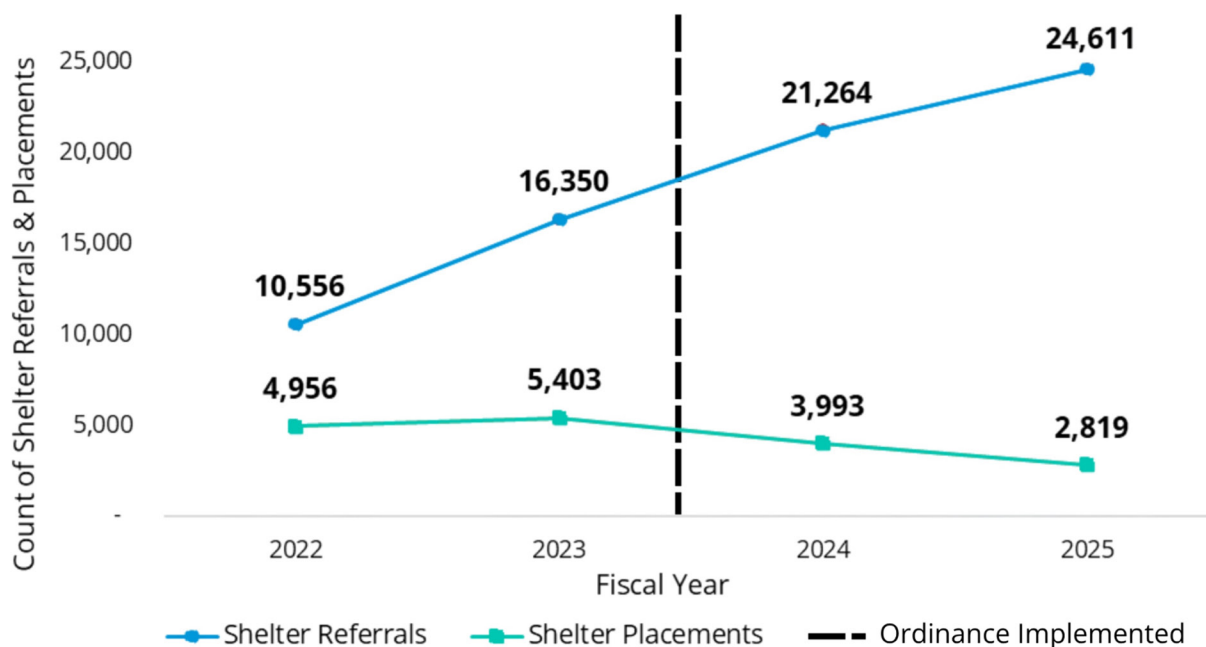
Since FY2022, the annual number of shelter referrals has increased, however the number of shelter placements has decreased, as shown in **Exhibit 10**.¹¹ SDHC emails the daily shelter availability to SDPD

11 These numbers reflect the number of requests for shelter, not the unique number of individuals who have requested shelter. Therefore, shelter referral totals include duplicate requests from the same individuals.

and other shelter referral partners each morning seven days a week. When people request shelter, SDPD and these partner agencies submit referrals through SDHC’s Coordinated Shelter Intake Program. When shelter is available, SDHC tries to match the person to a shelter that best meets their needs. Ultimately, due to the limited number of shelter space available, the vast majority of people’s requests for shelter cannot be met.

Exhibit 10

While Shelter Referrals Increased After the Implementation of the Ordinance, the Number of Shelter Placements Decreased Due to High Occupancy Rates



Note: These numbers reflect the number of requests for shelter, not the unique number of individuals who have requested shelter. According to HSSD, in the past two years, SDHC changed its process and now records requests more efficiently; this may have also caused the increase in requests after the implementation of the Ordinance.

Source: OCA generated based on SDHC’s October 2025 presentation to the SDHC Board of Commissioners on the Homelessness System Coordination & Navigation.

Question 3:

Did the number of citations, arrests, and prosecutions for encampments increase after the Unsafe Camping Ordinance?

Based on best-available data and our analyses, after the implementation of the Unsafe Camping Ordinance (Ordinance), the San Diego Police Department (SDPD) had more contacts with the unsheltered population for encampments, specifically in Fiscal Year (FY) 2025. While the proportion of contacts resulting in citation or arrest did not significantly increase, the number of contacts that resulted in arrests in FY2025 nearly doubled compared to FY2023, before the implementation of the Ordinance.

In the two years after the implementation of the Ordinance, SDPD increasingly enforced Ordinance violations; however, it still primarily enforced encroachment violations.

SDPD typically enforces three laws related to encampments: the Unsafe Camping Ordinance, encroachment, and illegal lodging.

SDPD typically enforces three laws related to encampments: the Unsafe Camping Ordinance, encroachment, and illegal lodging.¹² The City of San Diego (City) defines an Unsafe Camping Ordinance violation as a temporary structure, including tents used as shelter for one or more people or their belongings, without authorization on public property. The City defines encroachment as someone placing, constructing, or maintaining objects on any public street, sidewalk, alley, or public property or right-of-way. The California Penal Code defines illegal lodging as someone lodging in a building, vehicle, or place, whether public or private, without the permission of the owner.

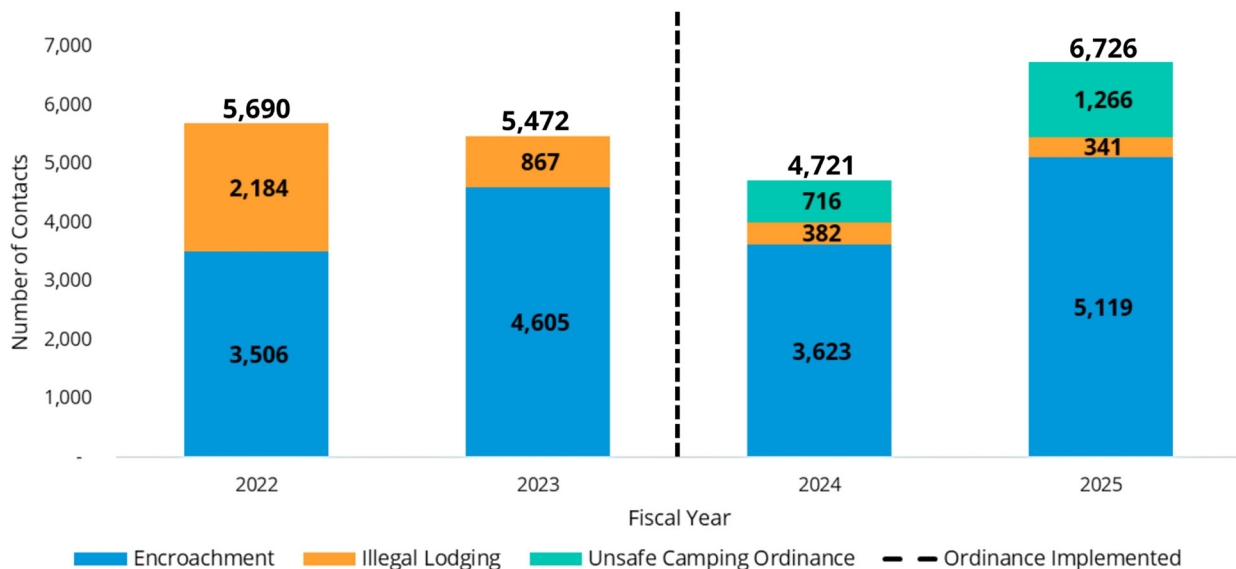
Collectively, in the two years after the implementation of the Ordinance, FY2024 and FY2025, SDPD made more enforcement contacts for encampments compared to the two years before, FY2022 and FY2023. SDPD increasingly used Ordinance violations as an enforcement mechanism for encampments after the implementation of the Ordinance in FY2024. However, SDPD continued to primarily enforce encroachment violations, as shown in **Exhibit 11**.

¹² SDPD enforces these three laws when people illegally reside in public spaces, which can vary in appearance but are often known as encampments. Therefore, throughout this section, we use the term “encampment” to represent when unhoused people reside in public spaces.

Neighborhood Policing Division (NPD) sergeants stated that SDPD enforces encroachment more often than Ordinance violations because it is harder to prove a violation of the Ordinance. SDPD stated that “camping” is more difficult to prove than encroachment, which is when someone blocks or intrudes on public property. For instance, a tent on the sidewalk is a clear violation of the Ordinance. However, a tarp hanging from a signpost over the sidewalk with a few belongings underneath is not a clear indication of camping, but clearly the items block the pathway of the sidewalk, which is encroachment.

Exhibit 11

Both Before and After the Implementation of the Ordinance, SDPD Primarily Enforced Encroachment, Compared to Violations of the Ordinance or Illegal Lodging



Note: This graph includes contacts that resulted in field interviews, citations, or arrests. Some contacts resulted in field interviews or citations for more than one violation. For instance, some contacts resulted in field interviews for both a violation of the Ordinance and encroachment.

Source: OCA generated based on data SDPD provided from the Automated Regional Justice Information System (ARJIS).

NPD also stated that while the Ordinance was effective July 2023, SDPD could not fully enforce the Ordinance until October 2023 because SDPD and the City Attorney’s Office (City Attorney) needed time to finalize and train staff on internal procedures for enforcing the Ordinance.

Before and after the Ordinance was implemented, most SDPD contacts for encampments resulted in field interviews, which aligns with SDPD's progressive enforcement model.

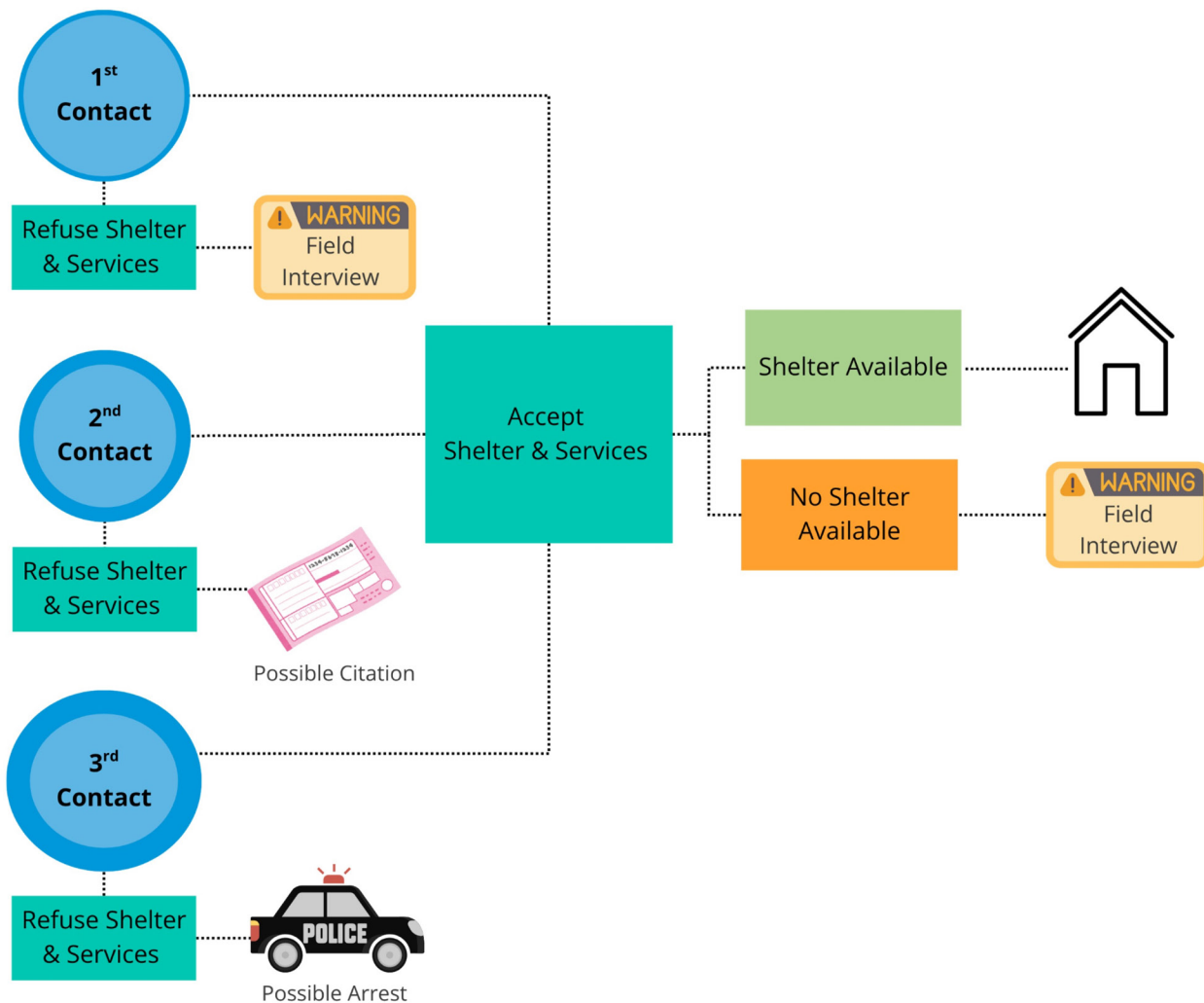
SDPD procedures direct officers to use a progressive enforcement model when enforcing violations of the Ordinance, encroachment, and illegal lodging, in order to provide a compassionate yet firm approach with the unsheltered population. At each contact, SDPD directs officers to offer shelter and services.

The first contact for all three violations results in a verbal warning, which officers document as a field interview. For Ordinance violations, if someone previously received a field interview and on the second SDPD contact refuses shelter but shelter space is available, the person can receive a citation, as shown in **Exhibit 12**. On the third SDPD contact for violating the Ordinance, if the person refuses shelter again, that person could be arrested. According to SDPD, if someone accepts shelter at the second or third contact but no shelter space is available, then typically the person receives a field interview rather than a citation or arrest.

During our observations of SDPD's enforcement of the Ordinance, NPD officers and sergeants followed the progressive enforcement model and regularly offered shelter and services.

Exhibit 12

When People Violate the Ordinance, SDPD Uses a Progressive Enforcement Model to Encourage Acceptance of Shelter and Services

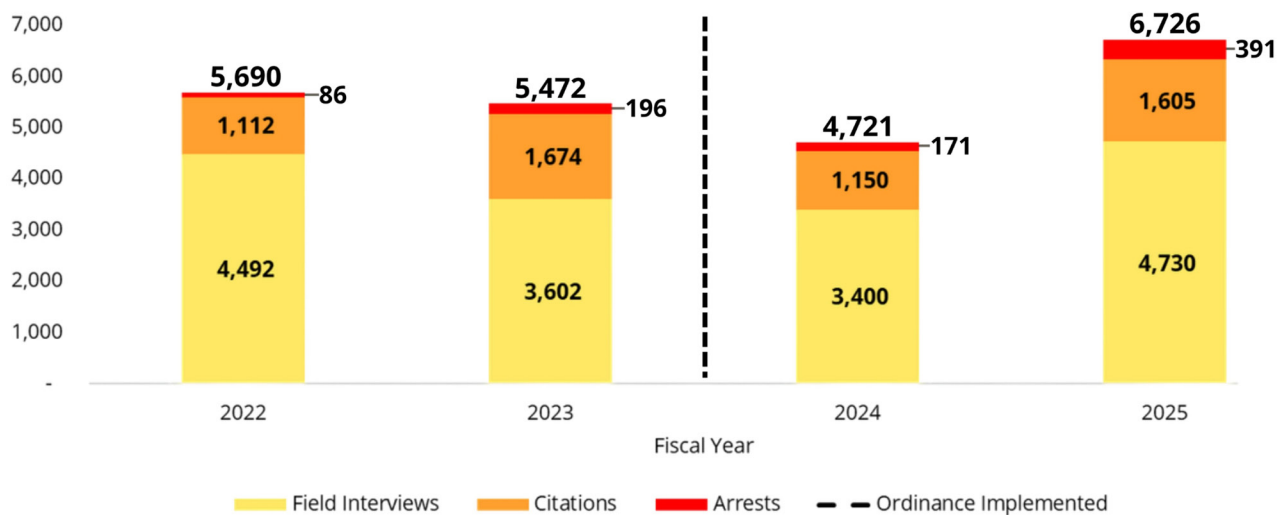


Source: OCA generated based on SDPD procedures and SDPD's public information on progressive enforcement.

We found that outcomes of SDPD's contacts, both before and after the implementation of the Ordinance, aligned with SDPD's progressive enforcement model. We found that the vast majority of contacts for violating the Ordinance, encroachment, and illegal lodging resulted in field interviews, compared to citations or arrests, as shown in **Exhibit 13**. SDPD also noted that the availability of safe sleeping sites allowed SDPD to provide more placements rather than citations and arrests.

Exhibit 13

Most Violations of the Ordinance, Encroachment, and Illegal Lodging Resulted in Field Interviews Rather Than Citations or Arrests, Before and After the Implementation of the Ordinance



Note: This graph includes some contacts that resulted in multiple field interviews and citations for more than one violation. For instance, some contacts resulted in field interviews for both a violation of the Ordinance and encroachment.

Source: OCA generated based on data SDPD provided from the Automated Regional Justice Information System (ARJIS).

After the implementation of the Ordinance, the proportion of SDPD contacts for encampments that resulted in arrests slightly increased while the proportion that resulted in citations decreased.

For all three enforcement mechanisms, 4 percent of SDPD contacts resulted in arrests in FY2023. In FY2024, after the implementation of the Ordinance, again 4 percent of contacts resulted in arrests. In FY2025, however, the proportion of contacts that resulted in arrests slightly increased to 6 percent and the number of contacts that resulted in arrests in FY2025 nearly doubled compared to FY2023. Comparatively, in FY2023, 31 percent of these SDPD contacts resulted in citations. In FY2024, however, after the implementation of the Ordinance, the proportion of contacts that resulted in citations decreased to 24 percent. In FY2025, again 24 percent of contacts resulted in citations.

SDPD provides a monthly report on the demographics of those contacted, cited, or arrested for violating the Ordinance.

As required by the Ordinance when passed by the City Council, SDPD has shared monthly reports to City Management on the demographics of those contacted by SDPD for violations of the Ordinance. These monthly reports include the monthly number of people contacted in field interviews, cited, or arrested for violations of the Ordinance, separated by ethnicity and gender.

There have been minimal prosecutions for violations of the Ordinance.

According to the City Attorney, it will only prosecute Unsafe Camping Ordinance cases if it can prove beyond a reasonable doubt that someone violated the Ordinance and if it has evidence that officers offered shelter. The City Attorney stated that Ordinance violations are generally more difficult to prove compared to other crimes because there may not be witnesses or camera footage of an offer by SDPD or refusal of shelter by the individual.

For calendar years 2024 and 2025, SDPD referred 1,137 Ordinance and encroachment cases to the City Attorney, of which a total of 4 percent were arraigned. As shown in **Exhibit 14**, only 4 Ordinance cases resulted in arraignments while 44 encroachment cases were arraigned.

Exhibit 14

Few Cases for Violations of the Ordinance and Encroachment Are Heard in Court

Case Outcome	Ordinance Violations (2024-2025)	Encroachment Violations (2024-2025)	Total (2024-2025)
Cases Referred to the City Attorney	338	799	1,137
Cases Issued by the City Attorney	18	149	167
Cases Arraigned	4	44	48

Source: OCA generated based on quality-of-life criminal case outcomes, provided by the City Attorney.

Ordinance and encroachment cases are also difficult to prosecute because, according to the City Attorney, defendants in these cases are not held in custody and typically do not appear for their scheduled court dates. For instance, of the 149 encroachment cases issued by the City Attorney in 2024 and 2025, the defendant did not appear in court for 105 cases, or 71 percent. The City Attorney stated that when the defendant does not appear, the court may issue a warrant for the defendant's arrest. However, the individual may be difficult to locate because their location is always changing.

Question 4:

Did City departments work and coordinate in their response to encampments after the implementation of the Ordinance, in accordance with the goals in the preamble of the Ordinance?

We found that City departments adhered to the intentions of the preamble of the Ordinance of protecting public health, safety, and the City's natural resources. City departments coordinated their efforts, prioritized encampment responses based on risk, and decreased response times to encampments after the implementation of the Ordinance.

Since the implementation of the Ordinance, City departments regularly communicated and collaborated to effectively respond to encampments.

The Environmental Services Department (ESD) and the San Diego Police Department (SDPD) independently monitor the Get It Done encampment reports assigned to their departments. However, they also coordinate their responses to Get It Done encampment reports to minimize duplicative efforts. Both ESD and SDPD staff are onsite when posting abatement notices as well as when completing abatements. According to ESD and SDPD, they align staff schedules to abate areas with several Get It Done encampment reports in the same area. During our observations of encampment abatements, ESD and SDPD worked together to plan which Get It Done encampment reports to respond to that day.

Additionally, both ESD and SDPD stated they regularly communicate with the Homelessness Strategies and Solutions Department (HSSD) to ensure that abatements and enforcement do not overlap with planned homeless outreach. Of note, the City's contracted outreach providers stated that earlier notification of planned abatements would help their staff provide outreach prior to the abatements. However, we found it would be a challenge for ESD to schedule abatements earlier in advance because scheduling depends on availability of ESD and SDPD staff and resources—as well as the number and locations of reported encampments. Therefore, we found that the outreach providers could use the public map of Get It Done encampment reports to identify where encampments have been reported and try to provide outreach services before the City abates these locations.¹³

¹³ The City of San Diego has a public online map of all Get It Done reports, available here: <https://getitdone.sandiego.gov/>

Furthermore, according to ESD, after the Ordinance's adoption, it attended bi-weekly meetings with the Mayor's Office and other departments to address homelessness. These meetings are now held quarterly.

The City responded more quickly to Get It Done encampment reports after implementation of the Ordinance, despite receiving more reports per month on average.

We found that the City received an average of 13 percent more Get It Done encampment reports in the 2 years after the implementation of the Ordinance, FY2024 and FY2025, compared to the 2 years before the Ordinance, FY2022 and FY2023.

ESD responded to encampment reports more efficiently after the implementation of the Ordinance.

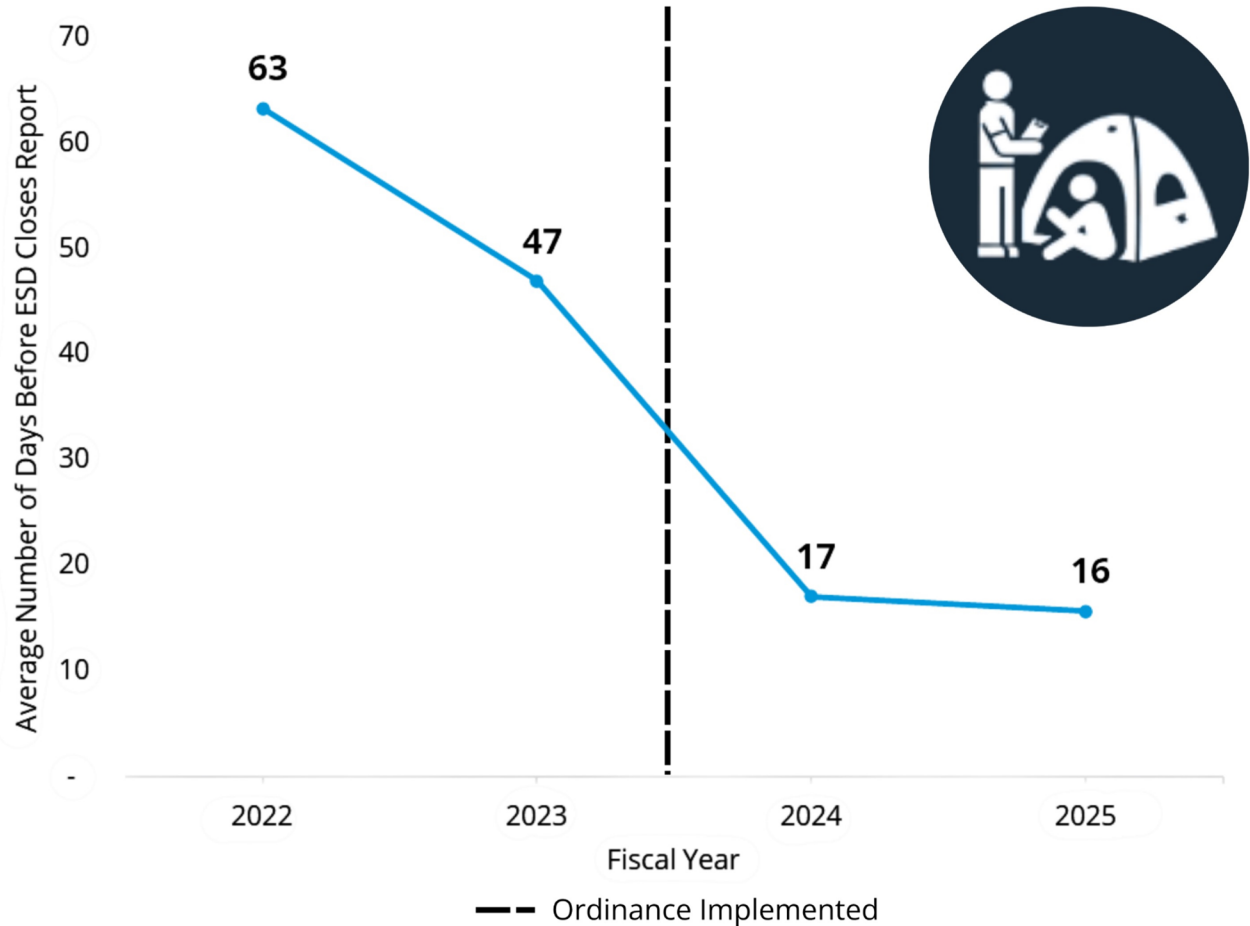
ESD decreased its average response time to encampment reports on public property after the implementation of the Ordinance.¹⁴ In FY2022, ESD averaged 63 days to respond to Get It Done encampment reports, which decreased to 47 days in FY2023, 17 days in FY2024, and 16 days in FY2025, as shown in **Exhibit 15**. According to ESD, the improvement in its response times can be attributed to organizational changes that removed competing priorities for certain staff and dedicated them to abatement work, filling vacancies, aligning resources with SDPD, enhancing Get It Done to allow staff more time in the field, and moving from a 3-hour abatement notice period to a 24-hour abatement notice period with the Ordinance.

[TSWViewReportByMap](#). These reports can be filtered specifically for encampment reports that are new, in process, or closed.

¹⁴ ESD has separate procedures to respond to encampments reported on public versus private property. This analysis only includes encampments reported on public property.

Exhibit 15

ESD Significantly Reduced Its Response Time to Reported Encampments

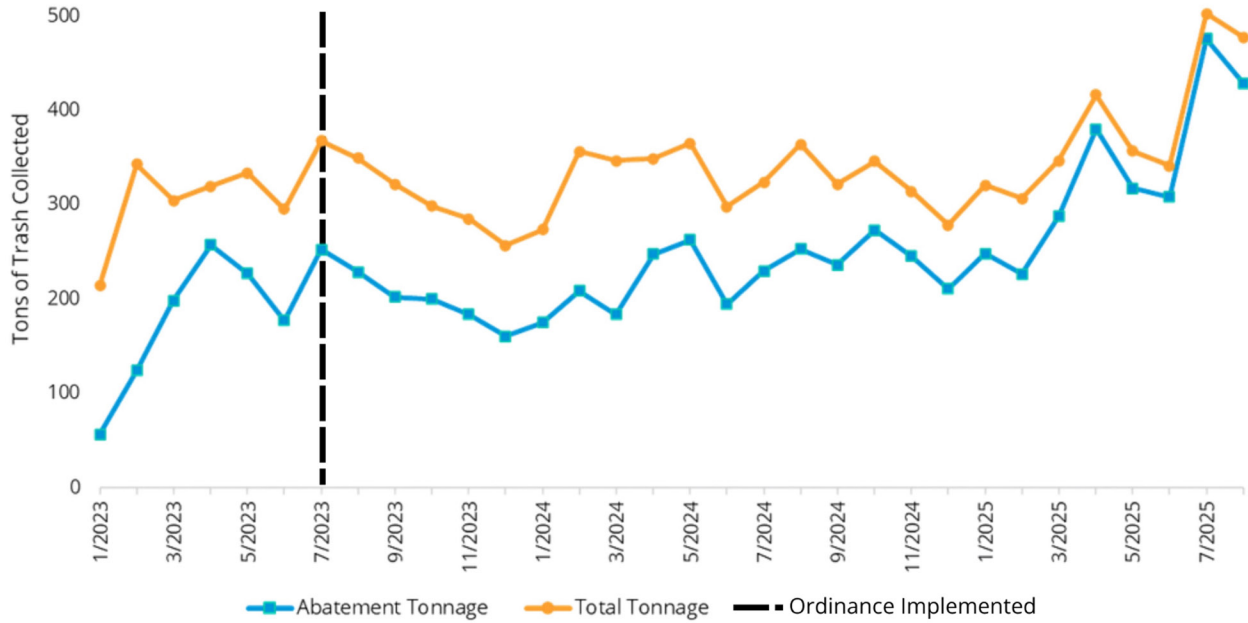


Source: OCA generated using Get It Done report data from the City's Open Data Portal.

While ESD responded to Get It Done encampment reports more efficiently, over time, it removed more tons of trash near encampments, as shown in **Exhibit 16**. Due to the frequency of ESD's abatements and trash collection near encampments, it has collected an increasing amount of trash at and near encampments since the implementation of the Ordinance in July 2023, creating cleaner streets, sidewalks, parks, and open spaces.

Exhibit 16

Over Time, ESD Collected More Tons of Trash at and Near Encampments



Note: Total tonnage includes trash collected through ESD’s abatements and its Hot Spot program.

Source: OCA generated using Clean SD Monthly Summaries provided by the Environmental Services Department.

SDPD also responded to encampment reports more efficiently after the implementation of the Ordinance.

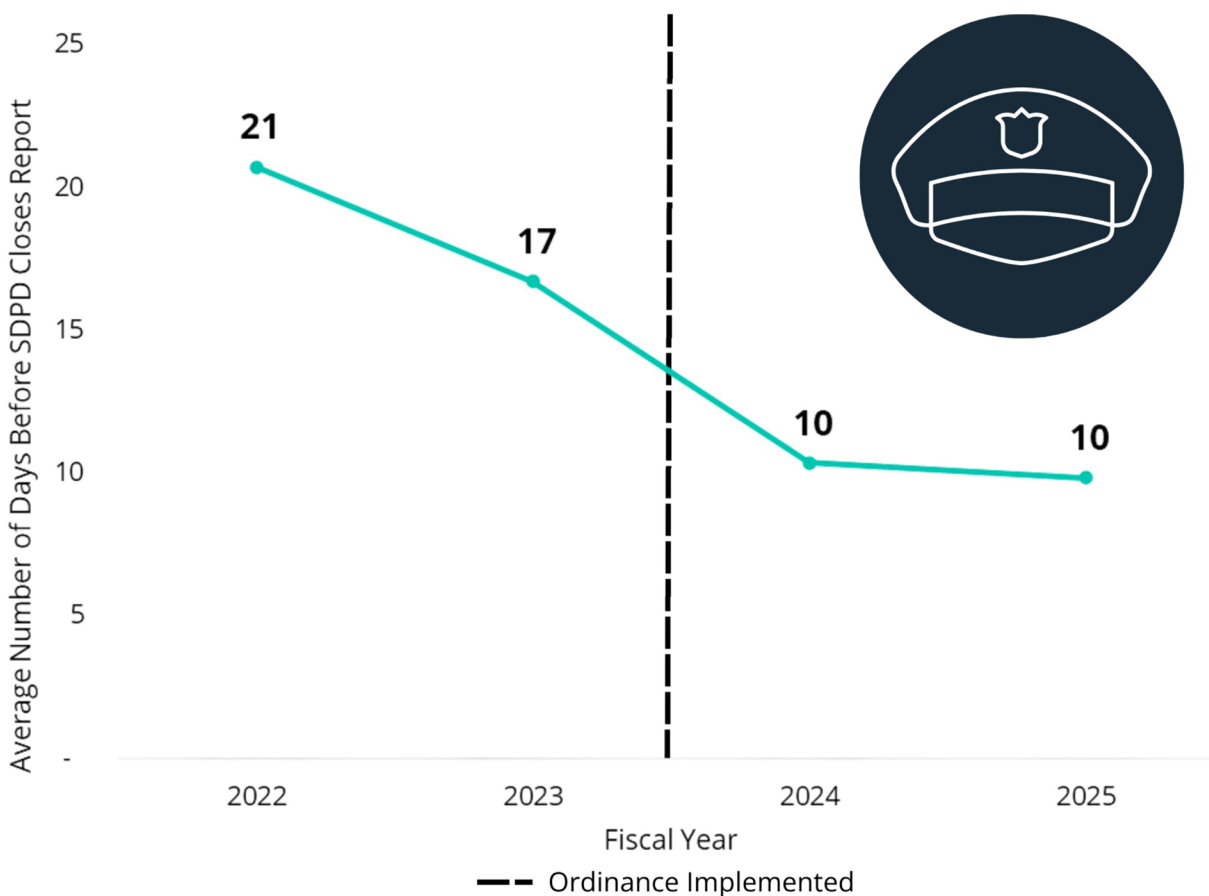
SDPD decreased its average response time to Get It Done encampment reports after the implementation of the Ordinance. In FY2022, SDPD averaged 21 days to respond to Get It Done encampment reports, which decreased to 17 days in FY2023, 10 days in FY2024, and 10 days in FY2025, as shown in **Exhibit 17**.¹⁵ According to SDPD, the improvement in its response times can be attributed to: 1) adjusting its overtime model—instead of officers on overtime monitoring a storage facility, these officers were repurposed to locations and events in public shared spaces during peak hours, which promoted public safety and reduced encampments; 2) since fall 2024, officers that completed phase training start with the NPD temporarily—which has helped

¹⁵ Our analysis considers the time from when a Get It Done encampment report opened to when SDPD closed the report or referred the report to another department. Sometimes a Get It Done encampment report starts with a different City department that transfers the report to SDPD. SDPD has previously reported faster response times to encampment reports because SDPD’s methodology is more precise than our analysis as it considers only the period of time that SDPD spent reviewing and resolving the reports. For instance, with the help of the Performance and Analytics Department, SDPD found it averaged 10 days to respond to Get It Done encampment reports in FY2024, it averaged 10 days in FY2025, and it currently averages 8 days in FY2026.

staffing; and 3) now SDPD’s senior volunteer patrols, instead of officers, drive by the locations of many Get It Done encampment reports in more remote areas to determine whether the encampments are still active and need further police response or if the location just needs waste to be abated.

Exhibit 17

SDPD Reduced Its Response Time to Reported Encampments



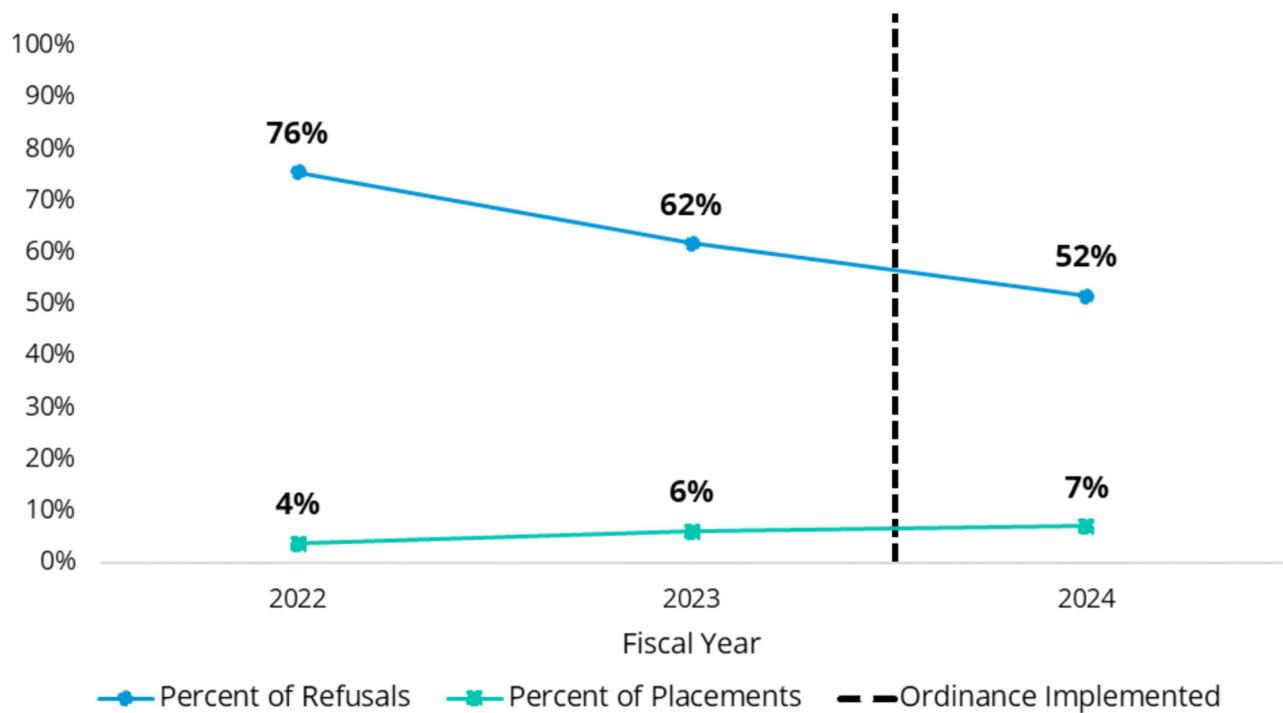
Source: OCA generated using Get It Done report data from the City’s Open Data Portal.

Because SDPD responded to Get It Done encampment reports more quickly after the Ordinance, officers interacted more frequently with people at encampments. Officers also offer services and shelter at each contact, including when accompanying ESD during abatement notice postings. These more frequent contacts may have contributed to the decrease in people’s refusal of services, as shown in **Exhibit 18**. Since 2021, SDPD has informally tracked the results of offers for services. Since the implementation of the Ordinance, the refusal rate of services offered by SDPD continued to decrease. In FY2024, only

52 percent of people refused SDPD’s offers of shelter or services compared to 62 percent in FY2023 and 76 percent in FY2022. Additionally, SDPD placed 7 percent of people in more stable locations when offering services in FY2024, compared to 6 percent in FY2023 and 4 percent in FY2022.

Exhibit 18

Since the Implementation of the Ordinance, the Rate of Refusals of Services Offered by SDPD Decreased



Source: OCA generated based on information provided by SDPD’s Neighborhood Policing Division.

While the FY2025 data is incomplete, for the second half of FY2025 and the start of FY2026, the refusal rate of services or shelter decreased again to 42 percent of SDPD’s offers.

Our 2020 Performance Audit of the City’s Efforts to Address Homelessness found that tracking the results of contacts with the unsheltered population can help the City evaluate the effectiveness of those contacts. The performance audit recommended that the City track the number of contacts, offers for services, and frequency services were provided at abatements.¹⁶ At the time of the report, the City agreed to partially implement the recommendation.

16 The Performance Audit of the City’s Efforts to Address Homelessness, issued in 2020, can be found here: https://www.sandiego.gov/sites/default/files/20-009_homelessness_0.pdf

However, the City ultimately determined it would not implement the recommendation because the outreach workers that record the results of contacts are not on-site during abatements.

Various homeless service providers have unique reporting procedures.

We found that a systematic process to track the results of all contacts and offers for services across the City would be a challenge to implement as each entity has unique reporting procedures. SDPD internally tracks the results of offers for shelter and services. The City tracks outreach engagement with the unsheltered population through the mandated reporting system used by homeless outreach providers across the County, the Homeless Management Information System. The local resource referral nonprofit organization, 211 San Diego, separately tracks the requests and referrals it makes for housing and services. Meanwhile, ESD stated California has specific reporting requirements for the contacts that occur during abatements on Caltrans property. Each entity uses a unique reporting system and records slightly different types of records. Therefore, we did not make a recommendation that the City develop an additional process to track the results of contacts and offers for services.

Both ESD and SDPD found mechanisms to make the Get It Done platform more efficient.

In efforts to respond to encampments more quickly, both SDPD and ESD found mechanisms within the Get It Done platform to work more efficiently. For instance, SDPD stated its Get It Done coordinator proactively reviews for duplicate Get It Done encampment reports when multiple reports come in for the same encampment, and bundles them under a “parent” report. This allows officers to close all duplicate reports at once, without having to close each individually. ESD code compliance officers can now use a map tool on their devices to select all reports they addressed at one location, allowing them to close out all the reports at once—which minimizes administrative tasks.

After the implementation of the Ordinance, typically there were longer delays before encampments returned to the same location.

One goal of encampment response is to discourage future encampments after the City enforces or abates a location. Notably, after the implementation of the Ordinance, all Council Districts saw an increase in the median number of days between when the City closed a Get It Done encampment report and when another report was submitted for the same location.

ESD and SDPD’s prioritization of encampment response aligns with the Ordinance and best practice.

Encampment responses should be prioritized based on imminent health and safety risks.

Both the Ordinance and best practice list public health and safety as the main priorities when responding to encampments. The preamble of the Ordinance states the intention of the Ordinance is to protect the health and safety of: 1) the people who stay overnight in public spaces; 2) the general public who use public spaces; and 3) the City’s natural resources. The Ordinance also states the intent of the Ordinance is to prohibit encampments while also encourage the unsheltered population to use available shelter spaces and services. Similarly, the U.S. Interagency Council on Homelessness states jurisdictions should prioritize encampment response based on factors that pose imminent health and safety risks.

ESD’s procedures focus on prioritizing encampment abatements with the greatest risks to public health and safety. ESD’s procedures direct staff to prioritize encampments with fire risk first. ESD also stated it uses data from Fire-Rescue to determine which areas might be high-fire risks. ESD stated it then prioritizes encampments based on environmental or seasonal conditions, such as being near the river during when there is a potential flood risk; as well as based on scheduling with SDPD, Caltrans, and other City departments; requests from the Mayor or City Council; and ESD staff knowledge of common encampment locations that require more frequent abatement to ensure encampments do not become too large and overwhelming to abate.

Similar to ESD, SDPD stated it prioritizes responding to encampments with fire risk first. SDPD stated it then prioritizes encampments based on impacts to residents, businesses, or community events.

City departments collaborated and placed more people into shelter under programming funded by the State’s Encampment Resolution Funding grants.

Notably, HSSD and the San Diego River Park Foundation stated that the City’s response to encampments through the State Encampment Resolution Funding (ERF) grants has been successful—largely because the grants come with funding resources to temporarily help pay for clients’ rent. Once an area has been selected, efforts focus on outreach for shelter and services while the City pauses abatements and enforcement. After the completion of outreach, SDPD enforces

violations of the Ordinance, illegal lodging, and encroachment. Finally, ESD abates the area and the City works to return the area to its intended purpose. Since FY2022, the City has been awarded two ERF grants, one for part of East Village and one at the Interstate 15 corridor. The City also submitted and received a joint ERF grant with the County of San Diego and Santee for the San Diego Riverbed.

Question 5:

Does the City equitably store personal items from abatements?

The City's item storage procedures generally align with best practices. While the City does dispose of some items that best practices recommend storing, it has a reasonable process for determining which items it will not store. While we did not find a pattern of concerns related to item storage, we found that the process should be as accessible as possible to ensure those impacted by abatements may retrieve their personal property. Additionally, the City of San Diego's (City's) extension of its notice period prior to abatements provided people more time to remove their belongings from encampments.

Extending the notice period prior to abatements allowed people more time to remove their belongings from encampments.

The extended notification period allows people more time to retrieve their belongings from encampments prior to abatement.

Prior to the adoption of the Unsafe Camping Ordinance (Ordinance), City procedures typically required three hours of notice prior to abatements for people to remove their belongings. Following the adoption of the Ordinance, this typical notice period extended to a minimum of 24 hours, which reduced the number of items requiring storage and the risk of disposing valued items. According to the City's Environmental Services Department (ESD) and the Regional Task Force on Homelessness (RTFH), this extended notification period allows people more time to retrieve their belongings from encampments prior to abatement. ESD stated that while it stored more items prior to the Ordinance, it often did not receive requests for the items to be returned.

Additionally, RTFH stated that prior to the Ordinance, unsheltered populations had less trust in the City's abatement process because they did not have enough time to retrieve their belongings. Now that the notice period is 24 hours, they know what to expect and fewer items are lost or disposed of during abatements.

The City disposes of some items that best practices recommend storing; however, it has a reasonable process for determining which items it will not store.

To ensure the City’s abatement item storage policies align with best practices, we compared the policies with those of eight comparable California cities. We found that San Diego has similar item storage policies to most of the eight benchmark cities.

All of the eight cities we reviewed have policies that state they store personal belongings, as shown in **Exhibit 19**. The City of San Diego’s Ordinance and ESD’s procedures align with this practice by stating that an item is eligible for storage if circumstances indicate that it belongs to a person, has apparent utility, and can be safely retrieved from the site.

Exhibit 19

Like Several Benchmark Cities, San Diego Lists Examples of Items It May Store from Abatements in Its Policies

City	Stores Personal Property	Lists Items It May Store in Its Policies
San Diego	✓	✓
Anaheim	✓	✓
Bakersfield	✓	✓
Fresno	✓	✓
Long Beach	✓	✗
Oakland	✓	✗
Sacramento*	✓	✗
San Francisco	✓	✓
San Jose	✓	✓

* The City of Sacramento may store items in the case of an arrest or an abandoned encampment. In these situations, Sacramento Police Department officers determine what items to store.

Source: OCA generated using policies and procedures from comparable cities and the City of San Diego.

Of the eight cities that store personal belongings, five provide examples of items they may store in their policies. San Diego's Ordinance and ESD's procedures, which are publicly available online, also include several examples of items that are eligible for storage. This helps ensure public transparency and consistent practices across City staff. San Diego, like these five benchmark cities, may store operational bicycles, personal papers (which can include IDs and photos), and medications with identifying information.

The California Interagency Council on Homelessness (Interagency Council) suggests that cities store bicycles that are in or near working condition and personal papers, and this practice is reflected in the City's policies. During our site visit to one of ESD's storage locations, we observed bicycles and personal papers in storage. The Interagency Council also recommends that non-hazardous personal belongings collected at encampments be stored for no fewer than 60 days. ESD exceeds this suggestion by storing items for at least 90 days.

Tents and backpacks or luggage may be stored by all of the five benchmark jurisdictions and recommended for storage by the Interagency Council. These items are not included as examples of items eligible for storage in the City's Ordinance or ESD's policies. However, they are included on ESD's list of items that it does not store because they are commonly abandoned at encampments. ESD stated it does not store backpacks or luggage because it requires staff to empty the contents and search for personal belongings prior to disposal, which we confirmed during our field observations of ESD's abatements.

According to ESD, it created its list of commonly abandoned items by reviewing previous impound logs to determine which items people typically left behind at encampments.

According to ESD, it created its list of commonly abandoned items by reviewing previous impound logs to determine which items people typically left behind at encampments. ESD noted this includes items that were left behind when people were present at their encampments and given time by staff to retrieve their belongings, per ESD policy. In addition to frequently abandoned items, the list also contains items that constitute fire hazards, such as propane tanks.

ESD stated that it has edited its list of commonly abandoned items over time. However, ESD should ensure that this review process continues and is consistently applied by developing a formal policy. The policy should require that ESD consider other cities' item storage policies, which it has done previously. ESD stated that it reviewed San Francisco's policies in 2024 and San Jose's policies in 2023. The policy should also include that ESD review previous impound logs and track items people have called to retrieve, even if the items were not stored. Despite excluding tents and luggage from storage eligibility,

ESD's process for determining this deviation from best practices is reasonable, provided it continues to document and consistently review item eligibility in accordance with this recommendation.

Stakeholders did not report a pattern of concerns related to ESD's item storage practices.

During our observations of ESD's abatements and visit to one of ESD's item storage locations, ESD staff followed abatement and storage procedures. Additionally, of the five City Council district offices that provided input, four reported that they have not heard concerns related to item storage after abatements. The City's contracted homelessness outreach providers had mixed reports on concerns related to item storage. One provider stated it has not heard concerns related to item storage and has worked to educate clients on managing their belongings. The other stated that it has heard a couple reports from clients of difficulty getting stored items returned, which it shared with the City's Homelessness Strategies and Solutions Department (HSSD).

The City could further ensure accessibility by providing impound notices in multiple languages.

While we did not find a pattern of concerns related to item storage, the process should be as accessible as possible to ensure those impacted by abatements may retrieve their personal property.

When City staff find an item for storage during an abatement, they post an impound notice in the area where they found the item. The impound notice, shown in **Exhibit 20**, states that ESD collected and stored property from an abatement and provides a phone number to contact to have the item returned.

Exhibit 20

ESD Staff Post Impound Notices During Abatements if They Collect Items for Storage

<p>The City of SAN DIEGO</p> <p>Date Posted: _____ Posted by: _____</p>
<p>Notice of Impounded Property</p>
<p>On _____ the City performed an abatement in accordance with San Diego Municipal Code section 63.0406 in the area of _____.</p> <p>During the abatement, items eligible for storage as defined in San Diego Municipal Code section 63.0406(d) were collected and put in storage.</p> <p>If you think your property was collected and stored, you can claim it by calling the Environmental Services Department at (858) 694-7000, Monday through Friday from 6:30 a.m. to 5:00 p.m. There is no charge to retrieve your property.</p> <p>The property will be stored for 90 days from the above date and then may be disposed of, recycled, or reused following the process in San Diego Municipal Code section 54.0212.</p>

Source: Provided by the Environmental Services Department.

ESD could improve the accessibility of the item retrieval process by providing information on its impound notices in multiple languages. Currently, the impound notices are provided only in English. However, according to the U.S. Census Bureau, as of 2024, 14 percent of the City’s population speaks English “less than very well,” the largest group of which is Spanish-speakers, who comprise 7 percent of the City’s total population. Additionally, both of the City’s contracted homelessness outreach providers stated that their staff speak languages other than English with clients and may use translation tools to communicate, if necessary. Providing notices in multiple languages would ensure those who are impacted by abatements have more equal access to and understanding of the item retrieval process. Providing information in additional languages aligns with the City’s strategic plan, which commits to achieving equity in access to City services and resources by eliminating structural disparities in its systems. Since originally discussing this recommendation with ESD, the department has already begun the process of updating its abatement and impound notices to provide access in multiple languages, including Spanish.

ESD and HSSD collaborate on returning items to their owners.

After posting impound notices, staff tag and log eligible items, and take them to one of ESD's two storage locations. Photos of one of ESD's storage facilities and item tags are shown in Exhibit 21. ESD stores items for a minimum of 90 days. To claim an item, someone must call the phone number provided on the impound notice and describe the item specifically enough to demonstrate ownership. ESD then delivers the item to the individual within a "reasonable distance," which includes areas outside the City, such as Spring Valley, El Cajon, and Del Mar, making item retrieval accessible to those who may not have transportation.

Exhibit 21

ESD Stores, Tags, and Logs the Eligible Items It Collects at Abatements



Note: Identifying information is redacted.

Source: Photographed by OCA.

Additionally, ESD and HSSD have worked together to provide homelessness outreach providers with information on the item retrieval process. According to HSSD, its staff have toured ESD's storage facilities to observe the storage process. It has also incorporated ESD's item retrieval phone number into its outreach strategy, in case clients do not feel comfortable calling the phone number on impound notices themselves. Outreach providers may also receive items on behalf of their clients.

ESD and HSSD also work together if the items found at abatements have personally identifiable information on them, such as IDs. According to ESD, its staff contact HSSD to try to locate the owner if they are currently in the City’s shelter system. Both HSSD and ESD stated that this strategy has resulted in successfully returning items to their owners.

Recommendations

To ensure the City’s abatement storage policies are continuously updated to store valued items and ensure equity in access to the City’s item retrieval process, we recommend:

Recommendation 5.1

(Priority 3)

To ensure the City’s abatement storage policies are continuously updated to store valued items, the Environmental Services Department (ESD) should formally document in a new or existing internal policy the requirement that it periodically review its list of items the City does not store. The policy should require that ESD consider other cities’ item storage policies and items that people frequently inquire about, even if they were not stored.

Management Response: Agree [See full response beginning on page 61.]

Target Implementation Date: May 29, 2026

Recommendation 5.2

(Priority 3)

To ensure equity in access to the City’s item retrieval services, the Environmental Services Department (ESD) should provide access to its impound notices in Spanish and consider other commonly spoken languages across the City. ESD should evaluate what the most effective method is to provide the impound notice in other languages.

Management Response: Agree [See full response beginning on page 62.]

Target Implementation Date: May 29, 2026

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 (OCA's) approved Fiscal Year (FY) 2025 Audit Work Plan, we conducted a performance audit of the City of San Diego's (City's) response to encampments since the adoption of the Unsafe Camping Ordinance (Ordinance). The objectives of this audit were to:

1. Determine if the City efficiently and effectively uses resources to respond to homeless encampments since the adoption of the Unsafe Camping Ordinance; and
2. Determine if the City's personal property storage and disposal processes in relation to the Unsafe Camping Ordinance are practiced equitably.

Scope

Our analysis focused on the City's response to encampments two years prior to the adoption of the Unsafe Camping Ordinance (FY2022 and FY2023) and two years after the adoption of the Ordinance (FY2024 and FY2025). The majority of our analysis did not include individuals sleeping in vehicles or in the City's safe parking sites because vehicle habitation is distinct from encampments in the San Diego Municipal Code. However, to determine the annual changes of the unsheltered homeless population in public areas, we included the counts of people staying at safe parking sites in our analysis.

Methodology

To determine if the City efficiently and effectively uses resources to respond to homeless encampments since the adoption of the Unsafe Camping Ordinance, we:

- Reviewed the City's Unsafe Camping Ordinance (O-21674).
- Reviewed the archived CityTV recordings of the June 13, 2023 and June 27, 2023 City Council votes, discussions, and comments on the Ordinance.
- Reviewed previous City of San Diego Office of the City Auditor and Independent Budget Analyst reports on homelessness.
- Reviewed encampment and homelessness audits and reviews conducted by:
 - Berkeley, CA
 - City of Los Angeles, CA

- Portland, OR
- Sacramento, CA
- San Francisco, CA
- Seattle, WA
- Reviewed the Environmental Services Department's (ESD's) abatement policies and procedures.
- Reviewed the San Diego Police Department's (SDPD's) policies and procedures applicable to abatement operations and enforcement of the Ordinance, Illegal Lodging, and Encroachment.
- Analyzed the annual Point-in-Time Count results for the City, the County of San Diego, and the State of California.
- Analyzed the City's Get It Done service data for encampment reports by response time, community planning district, and City Council district.
- Mapped Get It Done encampment reports by community planning district using Geographic Information Systems (GIS).
- Mapped the 2025 Point-in-Time Count reported by the Regional Task Force on Homelessness (RTFH) by Census tract in GIS.
- Worked with City GIS analysts to map Get It Done encampment reports geographically.
- Worked with City GIS analysts to analyze Get It Done encampment report changes in areas with posted Ordinance signage.
- Reviewed unsheltered census count data from Downtown San Diego Partnership and the San Diego River Park Foundation.
- Interviewed key City staff from:
 - ESD
 - The Homeless Strategies and Solutions Department (HSSD)
 - SDPD
 - The Mayor's Office
 - Four City Council District Offices
 - The Office of the City Attorney
 - The Library Department
 - The Performance and Analytics Department
- Conducted observations ESD abatement notice postings and abatements.
- Conducted ride-alongs with SDPD's Neighborhood Policing Division to observe Ordinance enforcement and the Homeless Outreach Team.
- Interviewed representatives from:
 - The Downtown San Diego Partnership
 - RTFH
 - The San Diego River Park Foundation

- The San Diego Housing Commission (SDHC)
- People Assisting The Homeless (PATH) San Diego
- Reached out to organizations to interview individuals who have experienced homelessness, but interviews were infeasible.
- Determined if 17 cities in San Diego County and 9 major California cities, aside from the City of San Diego, have adopted camping and encampment regulations.
- Interviewed representatives from schools with the largest increases or decreases in encampment reports after the posting of Ordinance signs, including:
 - e3 Civic High
 - Correia Middle School
 - Perkins K-8 School
 - Sherman Elementary School
 - Urban Discovery Academy (both the elementary school campus and the middle/high school campus)
- Analyzed the following data:
 - Coordinated Shelter Intake Program data provided by the San Diego Housing Commission (SDHC)
 - Shelter referral and placement data provided by SDHC
 - Safe Sleeping program data provided by Dreams for Change and the Downtown San Diego Partnership
 - Unsheltered census count data provided by the San Diego River Park Foundation and the Downtown San Diego Partnership
 - Automated Regional Justice Information System data for violations of the Ordinance, Illegal Lodging, and Encroachment provided by SDPD
 - Quality-of-life case outcome data provided by the Office of the City Attorney
 - Monthly Clean SD data provided by ESD
 - Refusal and placement data provided by SDPD
 - Locations of posted Ordinance signage provided by the Mayor's Office
- Reviewed encampment abatement and enforcement best practice from the U.S. Interagency Council on Homelessness.

To determine if the City's personal property storage and disposal processes in relation to the Unsafe Camping Ordinance are practiced equitably, we:

- Reviewed ESD's abatement and personal item storage policies and procedures.
- Interviewed key City staff from:
 - ESD
 - Four City Council District Offices

- Reviewed previous litigation relevant to the City's abatement and personal item storage procedures.
- Conducted observations ESD abatement notice postings and abatements.
- Conducted a site visit of one of the City's personal storage item containers.
- Reviewed abatement and personal item storage best practices from the California Interagency Council on Homelessness's Model Ordinance.
- Benchmarked San Diego's personal item storage procedures with the following:
 - Anaheim, CA
 - Bakersfield, CA
 - Fresno, CA
 - Long Beach, CA
 - Oakland, CA
 - San Francisco, CA
 - San Jose, CA
- Interviewed the City's two contracted homeless outreach providers, PATH San Diego and Downtown San Diego Partnership.
- Interviewed the Regional Task Force on Homelessness.
- Reviewed the 2024 American Community Survey 5-Year Estimates for languages spoken in the City by those who speak English "less than well."

Data Reliability

During this audit, we collected and referenced data from the following sources:

- Publicly available Get It Done service data from the City's Open Data Portal
- Automated Regional Justice Information System data for violations of the Ordinance, Illegal Lodging, and Encroachment provided by SDPD
- Publicly available annual Point-in-Time Count data
- Coordinated Shelter Intake Program provided by SDHC
- Shelter referral and placement data provided by SDHC
- Safe Sleeping program data provided by Dreams for Change and the Downtown San Diego Partnership
- Unsheltered census count data provided by the San Diego River Park Foundation and the Downtown San Diego Partnership
- Quality-of-life case outcome data provided by the Office of the City Attorney
- Monthly Clean SD data provided by ESD
- Refusal and placement data provided by SDPD

Get It Done Service Data

Based on our reviews of the description of the data on the City's open data portal, the OCA's 2022 Performance Audit on the City's Get It Done Application, and our interviews with ESD, SDPD, and the Performance & Analytics Department, we determined that there were no significant reliability issues with the City's Get It Done service data to sufficiently answer our audit objective of determining if the City efficiently and effectively uses resources to respond to homeless encampments since the adoption of the Unsafe Camping Ordinance.

Automated Regional Justice Information System Data

Based on our reviews of the OCA's 2020 Performance Audit of the SDPD's Data Analysis, the MOU Among SANDAG-ARJIS and Member Agencies for Use and Access to ARJIS Enterprise, SDPD's Crime Analysis Unit's emailed responses to our data usage questions, and our interviews with SDPD's Crime Analysis Unit, we determined that there were no significant reliability issues with California's Automated Regional Justice Information System (ARJIS) to sufficiently answer our audit objective of determining if the City efficiently and effectively uses resources to respond to homeless encampments since the adoption of the Unsafe Camping Ordinance.

For the remaining data we reviewed, verification sources did not exist to validate the accuracy or completeness of the data. However, we performed consistency tests for irregularities.

Internal Controls Statement

We limited our review of internal controls to specific controls relevant to our audit objectives, described above. We reviewed the Environmental Services Department's encampment policies and procedures as well as the San Diego Police Department's policies and procedures applicable to enforcement of the Ordinance, Illegal Lodging, and Encroachment.

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.

Appendix C

Public Resources

City of San Diego (City) departments and regional providers publicly share the outcomes of their response to encampments online. In addition to this performance audit, much of the information on the City's response to encampments is publicly available online.

1. The City's response rate to Get It Done encampment reports can be reviewed on the City's Open Data Portal, in the [Reports of non-emergency problems submitted by users of Get It Done](#) dataset.
2. A map version of historic and active Get It Done encampment reports can be seen on the City's online [Get It Done Reports](#) page.
3. [Downtown San Diego Partnership's unsheltered counts](#) are available online.
4. University of California San Diego's Homeless Hub has analyzed the unsheltered counts data and created a [Dashboard of Downtown San Diego Partnership's unsheltered census counts](#).
5. Downtown San Diego Partnership's [2024 Annual Report](#) includes outcomes of its Safe Sleeping Program and its [Quarterly Performance dashboard](#) includes recent downtown unhoused counts.
6. [San Diego River Park Foundation Homeless Census Reports](#) can be found online.
7. San Diego River Park Foundation also has an [interactive map](#), in which people can see the locations of inactive and active encampments in the riverbed.
8. Recent results of the [Regional Task Force on Homelessness Point in Time Count](#) can be found online.
9. Dreams for Change's [2023](#) and [2024](#) Annual Reports include outcomes of its Safe Sleeping Program.
10. The California Department of Housing and Community Development has an [online dashboard](#) of each Encampment Resolution Funds grantee's awarded and expended funding amounts.

Other City response information is tracked internally and shared across City departments or with the Mayor's Office and City Council offices upon request.

1. The San Diego Police Department's SDPD monthly reports on its response to encampments is shared with the Mayor's Office and interested Council offices.
2. The San Diego Housing Commission's daily shelter availability is shared with SDPD and other shelter and outreach referral partners each morning.
3. The Fire-Rescue Department's dashboard of fires that may be associated with homelessness is shared with SDPD, ESD, and Mayor's Office staff.

Appendix D

Total Get It Done Encampment Reports by Community Planning District from the Two Fiscal Years (FYs) Prior to the Passage of the Unsafe Camping Ordinance, FY2022 and FY2023, and the Two Years After Its Passage, FY2024 and FY2025

Community Planning District	Number of Get It Done Encampment Reports in Fiscal Years 2022 & 2023	Number of Get It Done Encampment Reports in Fiscal Years 2024 & 2025
Balboa Park	2,501	1,662
Barrio Logan	700	598
Black Mountain Ranch	12	12
Carmel Mountain Ranch	83	91
Carmel Valley	48	61
Clairemont Mesa	2,029	2,302
College Area	1,130	816
Del Mar Mesa	3	1
Downtown	15,477	22,415
East Elliott	4	2
Encanto Neighborhoods	833	838
Greater Golden Hill	720	1,043
Kearny Mesa	1,077	1,507
La Jolla	661	724
Linda Vista	1,130	1,309
Los Penasquitos Canyon	0	1
Mid-City: City Heights	4,305	4,858
Mid-City: Eastern Area	3,550	2,259
Mid-City: Kensington-Talmadge	890	1,191
Mid-City: Normal Heights	1,004	998
Midway-Pacific Highway	2,492	2,721
Military Facilities	11	13
Mira Mesa	1,243	1,319
Miramar Ranch North	32	42
Mission Bay Park	3,981	2,987
Mission Beach	402	219
Mission Valley	2,281	2,755
Navajo	1,206	1,393
Ncfua Subarea li	5	4

Community Planning District	Number of Get It Done Encampment Reports in Fiscal Years 2022 & 2023	Number of Get It Done Encampment Reports in Fiscal Years 2024 & 2025
North Park	3,052	3,141
Ocean Beach	2,080	2,547
Old Town San Diego	634	580
Otay Mesa	221	246
Otay Mesa-Nestor	1,216	1,227
Pacific Beach	2,469	2,529
Pacific Highlands Ranch	11	9
Peninsula	1,566	2,013
Rancho Bernardo	121	220
Rancho Encantada	5	7
Rancho Penasquitos	189	251
Sabre Springs	166	196
San Pasqual	2	2
San Ysidro	398	522
Scripps Miramar Ranch	70	125
Serra Mesa	302	400
Skyline-Paradise Hills	674	704
Southeastern San Diego	2,916	3,492
Tierrasanta	233	247
Tijuana River Valley	27	15
Torrey Highlands	16	9
Torrey Hills	13	12
Torrey Pines	69	48
University	873	892
Uptown	4,468	5,220
Via De La Valle	10	5
Citywide (Total Overall)	69,611	78,800




THE CITY OF SAN DIEGO

M E M O R A N D U M

DATE: April 28, 2026

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

FROM: Mayor Todd Gloria 

SUBJECT: Management Response to the Office of the City Auditor's Performance Audit of the Unsafe Camping Ordinance

This memorandum serves as the management response to the Performance Audit of the Unsafe Camping Ordinance (Performance Audit). The Performance Audit addressed five questions related to the City of San Diego's (City) response to encampments and included two recommendations.

When I brought the Unsafe Camping Ordinance (Ordinance) before the City Council in 2023, in partnership with Councilmember Stephen Whitburn, the intent was to strike a careful balance of maintaining compassion for our most vulnerable residents while upholding the safety and quality of life that all San Diegans deserve. That balance remains central to this work. The Ordinance addresses the needs of people experiencing homelessness while also responding to the community's expectation that public spaces remain clean, safe, and accessible.

The Ordinance is one component of a broader, coordinated strategy to reduce unsheltered homelessness—one that prioritizes outreach and service connections before enforcement.

Through targeted investments and work led by the Homelessness Strategies and Solutions Department (HSSD), the City is making measurable progress. The 2025 Point-in-Time Count reflected a 13.5 percent decrease in overall homelessness citywide. While this decrease shows progress, it does not reflect individuals staying at safe sleeping or at safe parking, due to definitions prescribed by the Department of Housing and Urban Development. Including these life-saving interventions would show an even larger decrease in true street homelessness.

The City currently funds approximately 2,600 shelter and Safe Parking options, including 1,474 traditional shelter beds, 767 Safe Sleeping tent spaces, 396 Safe Parking spaces, and 18 camper trailers for families. These programs are helping 875 individuals work to end their homelessness. Since 2021, City-funded sheltering programs have transitioned approximately 6,800 individuals into long-term housing.

The Ordinance's implementation coincided with the opening of two Safe Sleeping sites, expanding low-barrier options and connecting hundreds of individuals to services for the first

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time. As noted in the Audit, nearly 80 percent of individuals who stayed at these sites had not previously accessed the shelter system. These efforts, combined with expanded outreach and stronger coordination across City departments, reflect a continued commitment to ensuring viable alternatives are available before, and alongside, any enforcement activity.

I have been clear from the beginning that this approach starts with offering shelter and services. At every point of contact, the San Diego Police Department's (SDPD) progressive enforcement model prioritizes connecting individuals to available resources. The Neighborhood Policing Division (NPD), including the Homeless Outreach Team (HOT), plays a central role in building trust and connecting people to care.

In 2025, HOT provided assistance at least 5,731 times, resulting in 514 placements into shelter. That same year, individuals were diverted to substance use treatment more than 300 times as an alternative to incarceration. When individuals accept assistance, they are connected to shelter and supportive services. When they repeatedly decline available resources and continue violating the law, the model provides for measured escalation—from verbal warnings to citations and, when necessary, arrest. This ensures enforcement is not the starting point, but a response applied after opportunities for assistance have been offered and declined.

Before the Ordinance, the City had no municipal code provision specifically addressing encampments. Abatement processes relied on internal procedures that were not codified, only partially reflected in legal settlements, and not readily accessible to the public.

The Ordinance established a clear framework in the Municipal Code, making abatement practices transparent, consistent, and subject to public input. It provides direction on notice requirements, operational procedures, and the handling and storage of personal property.

Encampment abatements are distinct from enforcement. They are public health and safety operations conducted by the Environmental Services Department (ESD), with assistance from NPD, to clean areas and offer shelter and services before work begins—not to issue citations or make arrests. The Ordinance did not fundamentally alter ESD's underlying practices, which continue to follow legal requirements.

The Audit recognizes that the City's abatement item storage procedures generally align with best practices. Extending the notice period from three hours to a minimum of 24 hours has provided individuals more time to retrieve belongings, reduced storage needs, and increased trust in the process. ESD stores items for at least 90 days, exceeding the 60-day minimum recommended by the California Interagency Council on Homelessness. For items not stored, including tents and luggage, ESD follows documented procedures supported by historical data indicating these items are often abandoned.

Before the Ordinance took effect, several areas across the City were so heavily impacted by encampments that entire stretches of sidewalk became inaccessible to children and people with disabilities. In some locations, students walking to school were forced into the street because tents and related encampment debris blocked the sidewalks. One of the clearest benefits of the Ordinance is that it gave the City a more consistent and timelier framework to address those unsafe conditions and restore basic access to public spaces.

The Audit highlights meaningful progress since the Ordinance's adoption, and I am proud of the work our departments have done. ESD reduced its average response time to Get It Done

encampment reports from 63 days in FY2022 to 16 days in FY2025, while increasing the amount of waste collected. SDPD reduced response times from 21 days to 10 days. The City's services-first approach has also produced measurable results: the rate at which individuals refuse offers of shelter or services declined from 76 percent in FY2022 to 52 percent in FY2024, with preliminary FY2025 data indicating a further reduction to 42 percent. Point-in-Time Counts for 2024 and 2025 also show a decrease in the number of individuals living in public spaces following the opening of Safe Sleeping sites.

Recent data provides additional context. The Downtown San Diego Partnership's quarterly counts recorded more than 2,100 unsheltered individuals in May 2023 prior to the Ordinance's adoption, declining to 838 by May 2025. Along the San Diego River, counts from the San Diego Riverpark Foundation indicate an approximate 50 percent reduction in encampments in 2026 compared to 2025.

These outcomes reflect strong coordination among ESD, SDPD, and HSSD, and a balanced approach that both supports individuals experiencing homelessness and addresses impacts on neighborhoods, businesses, and public spaces.

At the same time, the Audit appropriately notes that unsheltered homelessness remains complex and that available data has limitations. The City's approach has never been to rely on enforcement alone, but to pair clear expectations with expanded outreach, safer alternatives, and stronger coordination.

The Audit also notes that available data does not support a definitive conclusion that these reductions resulted in displacement to other neighborhoods. Many individuals may have entered shelter, transitioned to housing, reunited with family, or otherwise exited unsheltered homelessness.

The Ordinance establishes when and where enforcement applies, creating a defined structure for addressing unlawful encampments while focusing on prohibited locations—not an individual's mere presence in public space. A person sitting or standing near a school or other public area without an encampment structure is not, by itself, conduct subject to the Ordinance.

While the Ordinance addresses encampments and related public health and safety concerns, it cannot by itself resolve key drivers of unsheltered homelessness, including serious mental health needs and substance use disorders. These challenges require a broader system of care involving healthcare, behavioral health, outreach, and County partners. The Ordinance is one part of a larger public response, but long-term progress will continue to depend on stronger systems of care beyond what City sanitation crews or police officers can provide on their own.

Management agrees with the recommendations within the Performance Audit.

RECOMMENDATION 5.1: To ensure the City's abatement storage policies are continuously updated to store valued items, ESD should formally document in a new or existing internal policy the requirement that it periodically review its list of items City does not store. The policy should require that ESD consider other cities' item storage policies and items that people frequently inquire about, even if they were not stored. (Priority 3)

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Management Response: Agree with the recommendation. ESD will establish a formal internal tracking and review process for the list of commonly abandoned items during abatements.

This process will be incorporated into ESD's Encampment Abatement Procedures and will require that, on an annual basis, ESD staff compile publicly available encampment abatement storage policies from other jurisdictions, review them, and, where helpful, contact those jurisdictions to better understand how and why certain items are stored. Based on that review, ESD will determine whether any updates to the City's list of Commonly Abandoned Items During Abatements are necessary. ESD will also coordinate with the Homelessness Strategies and Solutions Department so they can provide feedback as well. The overall storage process is already outlined in the Unsafe Camping Ordinance. The list of Commonly Abandoned Items During Abatements is the primary document subject to update through this regular review cycle.

Target Implementation Date: May 29, 2026

RECOMMENDATION 5.2: To ensure equity in access to the City's item retrieval services, ESD should provide access to its impound notices in Spanish and consider other commonly spoken languages across the City. ESD should evaluate what the most effective method is to provide the impound notice in other languages. (Priority 3)

Management Response: Agree with the recommendation. The abatement and impound notices have already been translated into Spanish, Tagalog, and Vietnamese. Because an abatement notice is placed on every tent and structure, providing four separate paper notices in different languages would be logistically infeasible and create unnecessary waste. ESD will continue to use the English notice as the primary notice posted in the field and will add a QR code that links directly to the notices in the electronically available languages of Spanish, Tagalog, and Vietnamese.

Under the QR code on the English version, the notice will state in English, Spanish, Tagalog, and Vietnamese that the code can be scanned to access the notice in the available languages. This approach will improve language access while keeping field operations practical and reducing excess paper use. ESD will also incorporate this multilingual access approach into its Encampment Abatement Procedures.

Target Implementation Date: May 29, 2026

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

cc: Honorable City Attorney Heather Ferbert
Paola Avila, Chief of Staff, Office of the Mayor
Charles Modica, Independent Budget Analyst
Rolando Charvel, Chief Financial Officer, Office of the Mayor
Scott Wahl, Chief, Police Department
Robert Logan, Chief, Fire-Rescue Department
Rania Amen, Chief Community Services Officer & City Engineer, Office of the Mayor
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