



Memorandum

TO: HONORABLE MAYOR
AND CITY COUNCIL

FROM: Jon Cicirelli
Jacky Morales-Ferrand

**SUBJECT: CITY ROADMAP - ENCAMPMENT
MANAGEMENT AND SAFE
RELOCATION POLICY**

DATE: April 29, 2022

Approved

Date

04/29/22

REPLACEMENT

REASON FOR REPLACEMENT

This memorandum corrects the timeframe when the Stormwater Permit will come to the Transportation and Environment Committee on page 9 and a mathematical error in Table 9 on page 18.

RECOMMENDATION

- (a) Accept the staff report on the status of the City Roadmap - Encampment Management and Safe Relocation Policy and direct the City Manager to:
 - (1) Maintain the Encampment Management strategy to provide sanitation and human services including the recommended setback guidelines and services, outreach, assistance, resources program criteria;
 - (2) Approve implementation of a Coyote Creek bi-weekly trash pickup program for Fiscal Year 2022-2023 to align with the Direct Discharge focus areas; and
 - (3) Explore the need to scale services to remove discharge/human waste from recreational vehicles and other lived-in vehicles.
- (b) Accept the update on the Guadalupe Gardens encampment abatement and rapid rehousing efforts and approve the extension of the Guadalupe Gardens cleanup to no later than September 30, 2022 to align with opening of relocation opportunities.
- (c) Accept the update on the Guadalupe River Trail Vehicle Prevention Project and work associated with development of the Prototype Park.

OUTCOME

City Council will be provided an update on the Encampment Management Strategy, implementation of a Coyote Creek bi-weekly trash pick-up program, and the need to scale services for lived-in vehicles. In addition, an update on staff's ability to rapidly rehouse individuals for full abatement of the Guadalupe Gardens encampment will be provided and, if approved, the no later than September 30, 2022 date for the full abatement of Guadalupe Gardens will be communicated to the Federal Aviation Administration. Also, City Council will understand the timeline, workplan and budget needs for the Vehicle Prevention Project and Prototype Park.

EXECUTIVE SUMMARY

During the COVID-19 pandemic emergency response, the City of San José (City) began implementing an encampment management strategy seeking to maintain encampment locations that were clean and offered sanitation, hygiene, and social services. New services such as the Encampment Trash Program and Services, Outreach, Assistance, Resources (SOAR) Program started at this time. In July 2021, the responsibility for encampment abatement shifted from the Housing Department to the Parks, Recreation and Neighborhood Services (PRNS) Department's BeautifySJ Program, including the new Encampment Trash Program and the encampment management process.

The principles of an equitable, effective, and efficient Encampment Management Strategy presented to City Council in December 2020¹ still apply today. Abatements are minimized to limit impacting the most vulnerable people in our society – those who are living a harsh existence outside at risk of sickness and death. Cleanliness through cooperation and timely trash service is emphasized for the health of the unhoused and to maintain a quality of life for all residents. This program is designed to support the unhoused where they are and keep the City clean while complementary policies and practices to house them are put into place.

There is an urgency for solutions. One of the solutions is accepting that there are some locations and conditions that our diverse unhoused community will live in, that housed residents may not understand or want to accept, yet it is our obligation to find common ground to serve everyone in San José.

BeautifySJ staff has continued the process of developing and refining the Encampment Management Strategy including analyzing existing and additional setbacks, increasing trash pickup at encampment sites, and implementing best practices to manage blight at encampment locations. The Housing Department has focused efforts on expanding street-based services and

¹ [December 2020 City Council Memorandum: BeautifySJ – Programs and Strategies to address Trash, Debris and Blight Across the City](#)

emergency programs, including the expansion of the SOAR Program and establishing two safe parking² sites.

This memorandum provides an update on the City Council Roadmap Priority: Encampment Management and Safe Relocation Policy and seeks Council feedback and direction on the following issues divided into two sections – Encampment Management Strategy and Guadalupe Gardens Project Update:

- Encampment Management Strategy
 - Setback guidelines
 - Encampment assessment decision process
 - Waterways approach in support of the Direct Discharge Trash Control Program
 - Interagency efforts with existing and new partners
 - Approach to services such as encampment trash performance, lived-in vehicles, SOAR expansion criteria
- Guadalupe Gardens Project Update

BACKGROUND

In Fiscal Year 2021-2022 there were several actions to consolidate and expand various BeautifySJ-related programs into one department to improve the delivery of services. This included budget actions in the amount of \$14 million from the American Rescue Plan and over \$2.8 million in the General Fund.

On October 26, 2021³, staff presented a status report on City Council Roadmap Priority: Encampment Management and Safe Relocation Policy that included the 3S protocol system used to manage encampments throughout the City. This protocol outlines where encampments cannot be located (setbacks), what areas remain where encampments can be managed (sites), and the necessary services and service levels (services) available. Staff also presented on the status of current setbacks, future setbacks that staff would analyze, and information on the expansion of the SOAR Program.

On February 8, 2022⁴, staff presented a status report on the Guadalupe Gardens Fencing and Activation Alternatives which provided an update on the encampment abatement and alternatives to fencing the Guadalupe Gardens property. The presentation also provided information on the Guadalupe Gardens Prototype Park concept, and a Vehicle Prevention Project to address impacts of vehicles located on a segment of the trail. Council directed staff to provide additional

² “Safe parking,” funded by the City, is a parking program, operated on property located outside of the public right-of-way and typically managed by a social service provider that provides individuals and families with vehicles a temporary place to park overnight while working towards a transition to permanent housing. Other services may include restrooms, shower facilities, security and controlled access for entry and exit.

³ October 26, 2021: Council Memorandum, Status Report on Encampment Management and Safe Relocation Policy

⁴ [February 8, 2022: Council Memorandum, Guadalupe Gardens Fencing and Activation Alternatives](#)

information on the ability to rapidly rehouse unhoused residents to meet the current June 30, 2022 deadline per the Federal Aviation Administration Corrective Action Plan.

ANALYSIS

Beginning July 2021, the BeautifySJ Program began an expansion, consolidation, and alignment of programs and services aimed to engage residents in clean neighborhoods, streets, and creeks. The consolidation included transitioning the Encampment Abatement Program from the Housing Department and the Illegal Dumping Program from the Environmental Services Department to the PRNS Department. The expansion also included the creation of the new Community Services Division in the PRNS Department; adding 39 new positions as part of 2021-2022 budget actions; shifting nine staff members from other departments to PRNS; launching the encampment management strategy; and consolidating and aligning long-standing PRNS BeautifySJ programs unrelated to encampments, such as Anti-Graffiti, Anti-Litter, Neighborhood Dumpster Days. These consolidation and expansion efforts grew the BeautifySJ Program from 16.5 positions to 64.5 positions in 2021-2022.

Currently, the PRNS Department is in the implementation phase of the BeautifySJ consolidation plan which includes hiring and training new staff. While the shifting of the Illegal Dumping Program from the Environmental Services Department to PRNS was straight forward, the transition of encampment management from the Housing Department has been more complex. Much of the complexity is due to BeautifySJ and the Housing Department using two different data systems to manage services at encampments and the bifurcation of services that are housed in two different departments but must work together. For example, BeautifySJ collects data that tracks the amount of trash and waste at encampment locations, while the Housing Department collects data from the Outreach program that works with unhoused residents to provide access to social services and housing and sheltering options. BeautifySJ has coordinated initial meetings with the Information Technology Department to discuss using technology to improve processes, including data integration, refining the intake process, and developing a comprehensive workflow system, and as part of the 2022-2023 Proposed Operating Budget, the Administration will be recommending new funding for this purpose.

The PRNS and Housing Departments are using a new Encampment Management Collaborative and working with several critical partners – such as the County of Santa Clara to address policy, system and priority issues and day-to-day operations with clear communication, coordination, and decision-making channels.

The Encampment Management Collaborative will provide multiple forums to discuss, and problem solve various system and service gaps, leverage resources and expertise, plan and implement equitable policies, and effective and efficient services across agencies and among numerous stakeholders.

SECTION 1: ENCAMPMENT MANAGEMENT STRATEGY

Table 1 outlines and describes the four Encampment Management Strategy objectives for this fiscal year which reflect the third pillar of the Community Plan to End Homelessness adopted by the City to improve the quality of life for unsheltered individuals and create healthy neighborhoods for all. Key results for each objective are developed on a quarterly basis and include work plan items outlined in Attachment A (Timeline for Encampment Management Strategy Work).

Table 1: Strategy Objectives

Encampment Management – City Roadmap Objectives	
Clean the City’s Public Spaces	Optimize encampment trash removal services and disposal systems through increased service frequency to ensure reliable removal of trash, biowaste, metals, vehicles, and hazardous materials.
Create Setbacks for Priority Locations	Enforce restricted areas along priority locations to reduce risks and address the safety and quality of life for all residents.
Identify Sites that Promote Safety and Belonging	Recognize areas deemed manageable where encampments may remain with protocols that enable people who are unhoused to live in clean, healthy places and are empowered to organize and self-manage.
Connect People to Social Services and Meet their Basic Needs	Provide access to human services and systems that create stability through outreach and assistance, including access to employment training or opportunities mental health services, substance abuse treatment as well as basic needs such as food, water, and equipment.

Setbacks – Areas Where Encampments are Not Allowed

Setbacks are enforced areas or locations where living structures and personal belongings are not allowed, and where people cannot live outside. These setbacks prohibit built structures or tents for the purposes of living within the public right-of-way (sidewalks, streets, medians, paved trails, City facilities) and within 150 feet of a school property. Table 2 below outlines the significant risk factors that guide the setbacks for encampment locations developed in coordination with internal departments. An encampment may be subject to abatement because the location presents risk factors or due to certain conditions that create risk factors regardless of the location.

Table 2: Setback Guidelines

Locations & Conditions	Definition
School Buffer Zone	Tents, built structures, or other belongings that are erected or stored within 150' of an elementary, middle, or high school property.
Blocking Public Right-of-Way	<ul style="list-style-type: none"> ▪ Sidewalks ▪ Streets ▪ Trails ▪ Medians ▪ Permitted events at City facilities ▪ City facility (park restroom, playground, community center, library, fire station, etc.)
Health and Safety Conditions	<ul style="list-style-type: none"> ▪ Fire danger ▪ Vehicle or Pedestrian Danger ▪ Unauthorized access to electrical ▪ Potential for drowning if flooding occurs ▪ Significant reoccurring or unresolved unsanitary conditions ▪ Severe vector control issue occurs
Obstruction to Critical Infrastructure	<ul style="list-style-type: none"> ▪ Infrastructure Degradation ▪ Public Operations and Maintenance ▪ Construction project (on land or waterways) ▪ Hospital and Trauma Centers

Based on these setback guidelines, 72 abatements were conducted between October 2021 and January 2022. Primarily these abatements were based on the 150-foot school zone buffer setback and right of ways. (See Figure 1 on page 12).

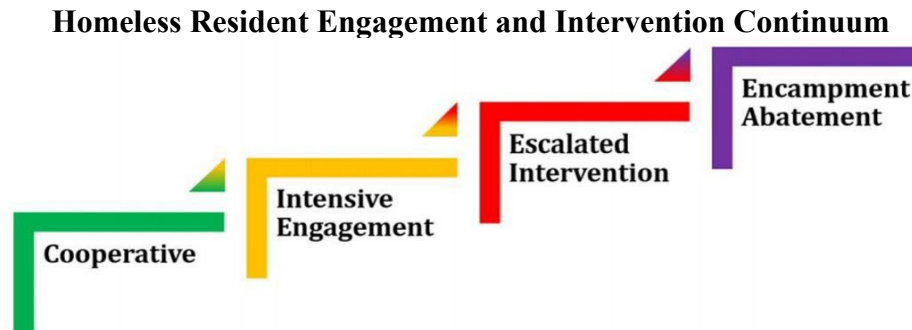
Encampment Assessment Process

Prior to the COVID-19 pandemic, the City's approach to encampment management was a complaint-driven, abatement-focused strategy. While this approach addressed the immediate location of an encampment, it rarely led to an outcome of fewer encampments, and often the encampment moved to a new location. The new Encampment Management Strategy seeks to manage encampments by using a variety of tools and approaches to better manage sites and reduce the need for abatements overall.

Currently, the Encampment Management team educates encampment residents on the "Good Neighbor" guidelines which include, bagging their trash; confining the space to a 12x12 area; storing personal items within their tent/structure/vehicle; and ensuring that the right-of-way is accessible. Encampments that do not adhere to the Good Neighbor guidelines are subject to additional escalated cleanup actions which may include abatement.

The chart below outlines the process used to manage engagements with residents at encampment locations. Providing trash service to our unsheltered population who reside in encampments does not follow the same linear process that residents in homes experience. The Encampment Management team uses the intervention continuum as a method to first work cooperatively with

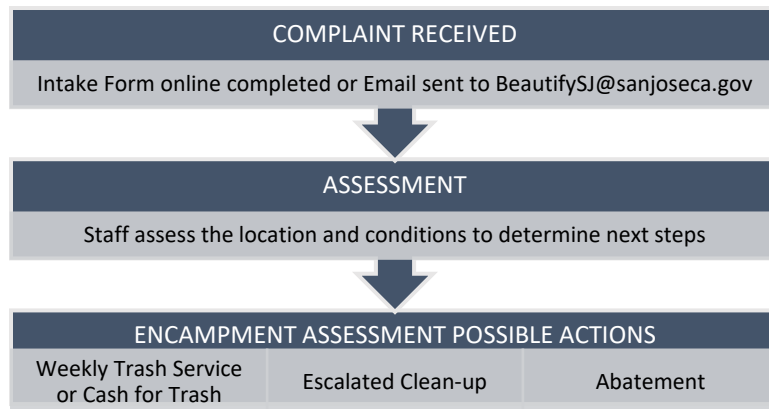
encampment residents to maintain their encampment area. An ongoing or chronic lack of cooperation may lead to escalating actions including removal of agreed upon trash, dismantling of an oversized encampment and up to the full removal of people from a location known as an abatement.



The chart below outlines the Encampment Assessment Process.

1. Intake of new or non-compliant encampment received.
2. Assess the site to determine the location and conditions that guide the next steps.
3. Once the assessment is complete, the following may happen:

- a. Determination that no abatement or escalated cleanup is needed, and the encampment is to be managed and receive weekly trash service.
- b. Determination that site is not orderly and in need of an extensive removal of trash and debris, but the people are allowed to stay and reconfigure the encampment size. The encampment may need to shrink its footprint which may mean that some structures are dismantled.
- c. If the need for an abatement (removal of encampment from a location) is determined, the City's abatement protocol will be followed, which includes, but is not limited to: posting for cleanup and removal; providing a minimum of 72 hours-notice prior to abatement; and requesting that outreach visit the site to offer shelter options.



Waterways

The sheer scale and complexity of issues in the waterways calls for a comprehensive approach to address the potential relocation needs of the people living in the waterways, the trash and vehicle removal, and the assessment of re-encampment prevention tools and resources. The principles of equity, effectiveness, and efficiency are needed to drive a plan of this magnitude and will require a comprehensive intra-departmental and intra-jurisdictional strategy.

San José has 26 distinct rivers and creeks and approximately 136 miles of waterways. In 2016, the California State Water Resources Control Board approved the City's Direct Discharge Trash Control Program (Direct Discharge) which focused on approximately 27 miles of waterways (Coyote Creek - 10.7 miles, Guadalupe River – 11.6 miles and Los Gatos Creek – 4.4 miles). Under the program, staff provides services such as encampment trash program, Cash for Trash, portable bathrooms and creek cleanups with non-profit partners and volunteers within the three established Direct Discharge Focus Zones⁵.

For a snapshot of current situation in these zones, the data below in Table 3 was reported in December 2021 by PATH (People Assisting the Homeless) within the Coyote Creek current Direct Discharge program zones:

Table 3: Outreach Data – December 2021 Snapshot

Zones	People	Structures/ Tents	Vehicles
Hwy 280 to Story Road: Coyote Meadows to S. 12 th Street	22	33	1
Tully Road to Capitol Expressway	74	75	23
Hwy 880 to Hazlett: 'Corie Court'	34	50	28
Total	130	157	52

The Environmental Services Department secured a grant for \$1.54 million from the Environmental Protection Agency which will be distributed over the next four years (2021-2025) to support non-profit partners and fund additional creek cleanups, including \$37,500 annually or \$150,000 over a four-year period to install structural barriers to minimize impacts to waterways. Santa Clara Valley Water has also provided grant funding to support creek cleanups in Council District 7 (\$200,000), funding to expand the Cash for Trash Program to waterways (\$180,000) grant over a three-year period) and supported fifty percent of the cost for Coyote Creek Trail Patrol Pilot Program (\$400,000).

Currently, BeautifySJ coordinates efforts with creek cleanup partner organizations (South Bay Clean Creeks Coalition, Keep Coyote Creek Beautiful) to remove trash and debris from Coyote Creek and the Guadalupe River. This fiscal year our partners and creek volunteers have filled over 7,700 litter bags with litter and trash which is equivalent to 135 tons of debris (270,000

⁵ 2106 Direct Discharge zones: (1) Interstate Hwy 280 to Story Road; 2) Tully Road to Capital Expressway; and 3). Interstate Hwy 880 to Hazlett Way)

pounds) from waterways. In 2021-2022 these partners each received \$50,000 in funding to conduct these cleanup efforts. The City Council approved Mayor's March Budget Message for Fiscal Year 2022-2023 directed the continuation of funding for volunteer driven waterways cleanup efforts.

Effective July 1, 2022, the California State Water Resources Control Board will be issuing a new municipal regional permit. The most recent draft permit requires the City to submit an updated Direct Discharge Trash Control Plan by September 1, 2022, and an updated Long-Term Trash Load Reduction Plan by September 30, 2023 that will address 100% trash removal by June 30, 2025. The Environmental Services Department will report to the Transportation and Environment Committee in the fall with more information on the Municipal Regional Stormwater Permit and associated costs.

The Coyote Creek weekly encampment trash service will be based on current resources for fiscal year 2022-2023 with the option of adjusting based on incoming data, such as the February 2022 Point-in-Time (PIT) count of unhoused residents scheduled to be available in the summer of 2022. Several City departments collect encampment data in addition to the PIT count, and these quarterly assessments from outreach partners, Environmental Service Department reports, and the BeautifySJ team should be the basis to inform decision-making relating to the City's priorities in the waterways and assist in the preparation of an updated Direct Discharge plan.

At the November 30, 2021⁶ City Council meeting, BeautifySJ was allocated funding from the American Rescue Plan Act to support trash pickup efforts near waterways. For 2022-2023 BeautifySJ will prioritize a waterways specific encampment trash program route. The new route will be in the three Direct Discharge focus zones along the Coyote Creek and would receive trash services every other week. With the current funding, BeautifySJ is able to conduct limited quarterly escalated clean ups with interagency partners near waterways and in the creek channel but will be extremely challenged to keep creeks free of vehicles or abandoned and vacant encampment structures. Staff will continue to evaluate this new program to determine the effectiveness and will re-examine the funding for this program should there be more than expected escalated clean ups or if the clean ups are more costly and complicated than anticipated.

Interagency Efforts

The BeautifySJ Interagency Team is the lead team for coordinating contracts and services to maintain clean waterways, highways and neighborhoods with four interagency partners. This Interagency Team was added as part of the November 30, 2021⁵ *Pandemic Response and Community and Economic Recovery Budget Adjustments*. The team is expected to be fully operational in late April 2022 and below is a summary of activities and the status of current agreements.

⁶ [November 30, 2022: Council Memorandum, COVID-19 Pandemic Response and Community and Economic Recovery Budget Adjustments.](#)

Caltrans, California Department of Transportation – Caltrans staff meets with BeautifySJ management twice per month to prioritize, coordinate and leverage resources to address areas with ongoing, reoccurring trash from encampments. This has led to better coordination to address areas most impacted by blight, including the McKee Road and Alum Rock Avenue off-ramps, the Meridian Way roundabout, and areas along Highway 101.

In February 2022, Caltrans announced Clean California Beautification Project funding for three City projects listed in Table 4 and agreed to partner with the City on Neighborhood Dumpster Day events. Unfortunately, the City was not awarded the competitive grant that was specific to implementing an education campaign to reduce trash related blight; park improvements to increase use in equity priority neighborhoods; projects to reduce the heat island effect; and a creek cleanup/community engagement project.

Table 4: Caltrans – Clean California Beautification Projects

Project location	Description
San José Almaden Beautification (D3)	Install improved and new sidewalks, fencing, buffer planting areas between the sidewalk and street including street trees, and infrastructure features to facilitate creation of community gardens and storage for unsheltered individuals.
San José Havana-Midfield Park (D7)	The City will develop this unused Caltrans space into a pocket park for the community and Caltrans has implemented an airspace lease for this parcel with the City.
San José Art	Clean up, modification or beautification of existing structures, lighting, enhanced paving, fencing, walls, inert material, green street elements, planters, planting/irrigation, signage or displays, public art installations such as murals or sculptures, improvement of public spaces in underserved communities, safety measures or alternative mode uses (ZEV Charging, transit stops, bike parking).

Union Pacific Railroad (UPRR) – The City established a ten-year Memorandum of Understanding (MOU) through 2030 and continues to work proactively with UPRR by leveraging resources to address areas with ongoing blight. The MOU states that a minimum of eight coordinated cleanups per year will be conducted; however, UPRR has continued to provide additional cleanups to support the City’s efforts to reduce blight.

County of Santa Clara, Roads and Airports Department – While the Emergency Operation Center (EOC) was mobilized and operating to address the pandemic emergency, the County contacted the City to coordinate trash and debris removal at encampment sites that are on County jurisdiction such as Mervyn’s Way in District 5. These coordinated efforts have resulted in negotiating a process to formalize this partnership to ensure continued trash removal at encampment sites near county expressways and unincorporated areas within the city.

Santa Clara Valley Water – The City and Santa Clara Valley Water have a long-standing Memorandum of Agreement (MOA) to coordinate the cleanup of trash, debris, and removal of encampments along waterways through June 2024. The City transferred responsibility of the

agreement from the Housing Department to the PRNS Department after the EOC was demobilized and based on the new BeautifySJ consolidated model. Amendments to the current MOA are not being sought at this time given the extensive operational workload with a focus on standing up new and expanded service delivery models. Coordination and communication efforts are the focus of the relationship with Santa Clara Valley Water and include quarterly joint projects planned and executed for mutual benefit. PRNS will be monitoring expenses to ensure fair, equitable resource distribution to joint projects.

Services Offered to those Living in Encampments

Encampment Trash Program Performance

In 2021, a total of 4,595 tons (9.2 million pounds) of trash and debris were collected (trash, dumping, bio-waste, household hazardous waste) and disposed of from encampments, streets, sidewalks and along waterways by the BeautifySJ team. The collection of the trash and debris comes from services such as encampment trash, Cash for Trash, illegal dumping program, and dumpster days. PRNS anticipates a significant increase in trash collection as expansion of these programs continue. The City's Mabury Yard, where there is a weight scale, has been greatly impacted by this influx of trash and debris. After sorting takes place at City yards, the Department of Transportation (DOT) coordinates the hauling of the trash from City yards to the dump. The Mayor's March Budget Message for Fiscal Year 2022-2023, as approved by the City Council, includes direction to engage current haulers to negotiate reduced dumping fees and explore ways to reduce costs, streamline cleanup operations and improve coordination with departments to optimize the use of transfer stations and maintenance yards. This system infrastructure and the costs for hauling and ensuring that procurement timelines are met are crucial to the overall effectiveness of services and the objectives of a cleaner city.

For example, the amount of trash deposited at Mabury Yard and other service yards has significantly increased in the span of a year, exhausting capacity in existing hauling purchase orders. In January 2022 the Mabury Yard was closed until a new purchase order was approved and issued.

The closure of the Maybury Yard in January contributed to some service issues. BeautifySJ operations regularly make 2-3 trips a day to Mabury Yard, but, during this period, BeautifySJ had to make daily trips to Newby Island in Fremont to empty trucks and compactors. The result was a 70% decline in meeting frequency targets for encampment trash removal during January 2022. With the increase in scale of BeautifySJ programs, comes the necessary companion support for trash disposal in the downstream parts of the system infrastructure.

In addition, two other service impacts during Q2 (October 2021 – December 2021) and in Q3 (January 2022 – March 2022) reduced the ability to fully implement the Encampment Management Strategy. First, nearly half of the BeautifySJ team was impacted by COVID-19 (Omicron) beginning in December 2021 through January 2022 which led to many staff absences. Second, due to the PIT count from February 8 to February 26 of this year, BeautifySJ halted

abatements and some escalated cleanup actions to ensure that encampment locations were not disrupted.

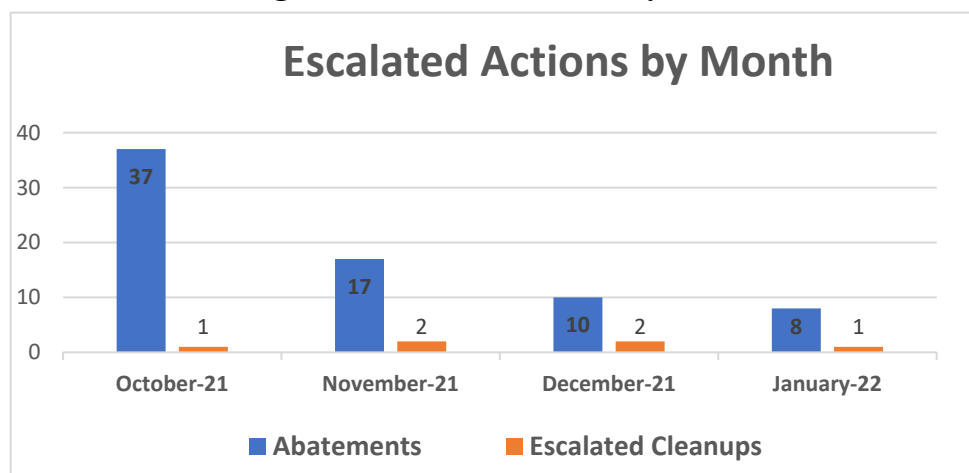
Please see Table 5 below for program performance highlights on a quarterly basis from January through December 2021.

Table 5 – Program Performance Highlights

Program	Quarter 3 (January – March 2021)	Quarter 4 (April – June 2021)	Quarter 1 (July – September 2021)	Quarter 2 (October – December 2021)
Number of encampment locations	219	208	220	224
Tier 3 On Time Pick-up (goal is 75%)	72%	77%	82%	74%
Total Cash for Trash Participants	174	259	300	320
Illegal Dumping – Service requests	5,942	7,744	6,816	4,316
Illegal Dumping – Tons Collected	687	748	674	509
Total trash pickups at encampments	3,007	3,085	2,665	2,432

Figure 1 below compares escalated clean-ups to abatements where people are moved from locations. The decline in abatements may be attributed to greater awareness of the locations where encampments are not allowable, weather, and staffing capacity.

Figure 1- Escalated Actions by Month



Lived-In and Recreational Vehicles

BeautifySJ is continuing to coordinate with departments to develop a plan to address recreational and other lived-in vehicles that are parked in neighborhoods, business corridors, and parking lots.

DOT manages the Vehicle Abatement (VA) Program which addresses vehicles located within the public right-of-way that are inoperable, a safety hazard, or an extreme blight concern. DOT receives over 60,000 VA service requests each year (pre-pandemic). Since 2018, when investigating service requests, the VA Program has identified 200-300 vehicles annually as being occupied. Recreational vehicles (RVs) account for 40-60% of the VA Program identified occupied vehicles.

Currently, the City's VA Program is not authorized nor resourced to address vehicle habitation situations. Parking and Traffic Control Officers (PTCOs) respond to VA service requests, but it is important to note that PTCOs are not sworn officers, have narrow enforcement authorities, and have limited actions they can take when investigating vehicles. Additionally, PTCOs are not able to tow vehicles that are occupied. When encountering vehicle habitation, PTCOs refer the reported vehicles and associated issues to the Housing Department for follow up so services can be provided and BeautifySJ is engaged when trash and sanitation services are needed.

Although BeautifySJ distributes and collects litter bags from individuals living in vehicles, there are challenges to providing services related to 'black water' or biological waste disposal. Currently, there are no services available to properly address this type of waste which has led to complaints from neighborhoods and businesses. BeautifySJ currently provides limited, inconsistent services to address bio-waste for lived-in vehicles. BeautifySJ has one vendor that services encampments that can provide limited bio-waste disposal services for lived-in vehicles with a focus on addressing waste in buckets/containers or other soiled trash. In the past BeautifySJ has coordinated services on weekends with support from DOT to address waste disposal for lived-in vehicles. The lack of funding for a dedicated program to address black water and biological waste from lived-in vehicles has led many to simply dispose of this waste in the street.

SOAR Expansion Update

The Community Plan to End Homelessness prioritizes expanding street-based services for the unsheltered. In alignment, the Housing Department developed the SOAR program. The program provides proactive street outreach and case management, portable restrooms and trash services, and housing and shelter referrals for encampment residents. At the beginning of the COVID-19 pandemic, the Housing Department assessed homeless encampments throughout the City to identify SOAR sites for targeted services. The identifying criteria was size, as the primary objective was to reach the greatest number of people. Sixteen of the City's largest encampments were selected, and they are listed in Table 6 below.

Table 6: SOAR Sites Phase One

SOAR Sites	Council District	Status	Provider
Corie Court/Coyote Creek	3	Current site	PATH
Guadalupe/87/Woz/Park	3	Current site	PATH
Virginia/Guadalupe River Trail	3	Current site	PATH
Brokaw/Old Oakland/Coyote Creek	3	Current site	PATH
Spring/Hedding/Coleman	3	Current site	HomeFirst
Roosevelt Park/Coyote Creek	3	Current site	HomeFirst
Olinder/Williams/16 th /Coyote Creek	3	Abated	HomeFirst
St. James Park	3	Current site	PATH
Willow/Lelong/Guadalupe	6	Current site	HomeFirst
Felipe Avenue	7	Abated	HomeFirst
Roberts/Coyote Creek	7	Abated	HomeFirst
Tully/Capitol/Coyote Creek	7	Current site	PATH
Coyote Meadows/Remillard Court	7	Current site	PATH
Stone/Cimino	7	Current site	HomeFirst
Aborn/Thompson Creek	8	Current site	HomeFirst
87/Branham/Narvaez	10	Abated	HomeFirst

The Housing Department contracted with PATH to provide outreach and housing services to individuals residing in seven encampment SOAR sites, most of which had more than 25 people living in them.

PATH service highlights between January and June 2021 include:

- Assisted 72 individuals with case management and/or housing and completed 54 new assessments for housing;
- Placed 12 individuals in permanent housing, of those 12, 90% were placed in housing using “Housing Problem Solving” or one-time financial assistance; and
- Placed 44 individuals in shelter or temporary housing.

PATH reported that the combination of a lack of shelter beds and maintaining staff capacity during the COVID-19 pandemic due to illness and turnover were the primary obstacles to meeting all of their outcomes. PATH’s SOAR program provided enhanced case management services at these locations, such as Housing Problem Solving, to find permanent housing solutions for unsheltered participants within 30 to 45 days of initial contact. Housing Problem Solving is a person-centered and housing-focused approach to explore creative solutions to quickly house an individual rather than refer them to shelter.

The Housing Department also contracted with HomeFirst to target outreach and housing services to individuals residing in nice encampment SOAR sites.

HomeFirst service highlights between January 2021 and June 2021 include:

- Assisted 345 individuals with case management and/or housing services and completed 187 new assessments for housing; and
- Placed 11% of individuals in temporary housing or permanent housing (goal is 12%).

Many participants refused shelter referrals as they were concerned they would contract COVID-19 in a group setting. HomeFirst also reported staff capacity as a primary reason for not meeting outcomes due to staffing shortages, employees impacted by COVID-19 illness, and staff turnover.

In the City Council approved Mayor's June Budget Message for Fiscal Year 2021-2022, staff was directed to expand the SOAR program and \$3 million was allocated for this purpose. The Housing Department developed a set of criteria to guide the new SOAR site selection. The criteria were based on the encampment management principles of equity, effectiveness, and efficiency and developed from lessons learned from operating the program during the pandemic, input from community, BeautifySJ staff, community advocates, and those with lived experience of homelessness.

Table 7: SOAR Program Expansion Criteria

Criteria	Description
Encampment Size	Size was the sole criteria when the original sites were selected at the start of the pandemic. It is still an important factor, as large encampments can impose other public health concerns such as sanitation and disease.
Point in Time Count Census Data	The PIT count, or census count, conducted every two years provides data per Council District. The 2019 count found that Council Districts 3, 6 and 7 have the highest concentrations of homeless residents. SOAR locations should, to the extent possible, be based on the level of concentrated locations.
Service Level Needs	Some locations may have higher levels of acute service needs. For example, sites may require close coordination with County Behavioral Health, Valley Homeless Healthcare or County Re-entry where an increased level of support through SOAR is beneficial.
City Jurisdiction	A lesson learned from SOAR during the pandemic is that it is important that the sites be on City controlled land, particularly if the goal of the SOAR program is to manage an encampment, provide services and is a low priority for abatement. Some SOAR sites not on City property were abated last year making it difficult to provide services.
Alignment with Encampment Setback Guidelines	It will be important to select sites that are not in encampment setback areas, as these sites are higher priority for abatement, such as the school buffer zones.

Public Projects	Another lesson learned from implementing SOAR in the first year was that some sites were abated as they were in locations that were in construction project areas. For example, a site along the Coyote Creek trail was abated to make way for a trail project.
Physical layout/location	A critical service of the SOAR program is onsite portable restrooms, handwashing stations and dumpsters. An encampment must have accessible areas to place equipment and be serviced regularly by trucks.

Based on these criteria, the Housing Department and BeautifySJ are analyzing sites and developing a list of approximately 10 new sites for the SOAR expansion. The Housing Department is also working on contract amendments with nonprofit providers to offer services for the expansion. An update will be provided to City Council when those contracts come for approval later this spring.

SECTION 2: GUADALUPE GARDENS PROJECT UPDATE

Below are responses to the direction given to staff at the City Council meeting on February 8, 2022⁷, related to the Guadalupe Gardens Fencing Project and Activation Alternatives.

1. Comply with FAA direction to ensure there are no unhoused residents in the Guadalupe Gardens area by June 30, 2022, by accelerating rehousing efforts.

Over seven months, HomeFirst has provided housing to 71 individuals and repaired 9 vehicles. Table 8 provides detail.

Table 8: Housing Placements and Vehicle Repairs

Housing Solutions September 2021 – February 2022	Number of People Served
Permanently Housed/One-Time Financial Assistance	8
Interim Housing Placement	36
Rapid Rehousing or Permanent Supportive Housing	27
Recreational Vehicle or vehicle Repair	9
Total	80

HomeFirst continues providing daily services to individuals encamped at the Guadalupe Gardens. A by-name list of individuals living there has been created and outreach teams are working with the Housing Department and County Office of Supportive Housing (OSH) to accelerate housing of individuals that qualify for Permanent Supportive Housing and Rapid Rehousing based on their vulnerability assessment scores. OSH and County Behavioral Health

⁷ [February 8, 2022: Council Memorandum, Guadalupe Gardens Fencing and Activation Alternatives](#)

are also reviewing the client list to determine who is eligible for outpatient services, who is connected to service providers, and who needs to be reconnected to their provider. HomeFirst and Veteran Affairs services are also being connected when a veteran is identified.

With the assistance of a community volunteer, HomeFirst has secured a mechanic who is willing to work onsite at Guadalupe Gardens doing minor repairs as well as work on cars at the owner's shop that need more complex repairs. HomeFirst is completing an assessment of all the cars in the area to determine what level of service is needed. They will prioritize the cars that need minimal and slightly more complex (parts need to be ordered, requires tools that are not mobile, etc..) repairs first. Vehicle owners must also work with HomeFirst on housing plans to ensure the repair of the vehicle is moving the person toward securing housing.

- 2. Identify the outstanding need for housing and safe parking solutions by working with HomeFirst to compare the latest census count conducted in the Guadalupe Gardens and along the river against the number of unhoused residents who:**
 - a. Have accepted and moved into housing;**
 - b. Have been referred to a housing solution and are awaiting placement;**
 - c. Are unlikely to accept housing, but willing to accept safe parking, shelter, or a drug rehabilitation program.**

The Guadalupe Gardens site still has approximately 131 people living in the Stage 3 area including a section of Guadalupe Trail, between Hedding and Taylor St, that is not technically within the 40 acres of FAA concern. The Housing Department and OSH have developed a Housing Plan for the 131 households to move to permanent housing. (The Housing Plan does not include providing a housing solution for the 43 people who are living on the trail from Taylor to Santa Clara). Interim or temporary housing will be needed while staff works with households on moving them to their permanent housing location.

People will be relocated as quickly as possible to either a housing placement or to an interim housing solution once a slot or bed becomes available. Vacancies at all City interim housing sites will prioritize residents living in the Guadalupe, in addition to residents staying at Surestay, for placement as beds become available until the site has been vacated. The Housing Department will also explore using limited motel stays if an operator can be identified or if a HomeKey motel site becomes available. No more than ten people will be placed in any one interim housing community. Housing solutions that will be offered and led by the City include Rapid Rehousing and Housing Problem Solving. The City funded Rapid Rehousing program will provide a time limited rental subsidy with case management support to house 24 people. The City funded outreach team led by HomeFirst will immediately assist the four people who appear to need one-time financial help to locate a suitable home. Housing Problem Solving involves engaging the person in identify solutions that will result in a housing placement. The City cannot implement the Housing Plan without the partnership of OSH.

The Housing Plan relies on resources from both OSH and the Housing Authority of Santa Clara County (Housing Authority). OSH receives federal and state funds that are dedicated to housing

and providing services to people experiencing homelessness. There are 26 people who qualify for housing programs administered by the County through the Coordinated Entry Program. An additional 44 people can be assisted with either an existing subsidy or through a Housing Choice Voucher. While OSH has shifted some of their resources to assist the City in developing this plan; they have identified both a funding gap and the need for additional Housing Choice Vouchers. OSH has requested \$100,000 in ongoing funding to provide a housing solution for 70 people. OSH has agreed to place people, who qualify for County programs, in their interim housing communities as beds become available. They will deploy a County outreach team in May to begin the enrollment process. If the City Council approves this memorandum, the Housing Department will return with a modification of the existing County contract before the end of the fiscal year. The Housing Department, with the support of OSH, has also submitted a request to the Housing Authority for 60 Housing Choice Vouchers. Final approval has yet to be received and the timing on when the vouchers will become available has yet to be determined. Table 9 below provides a summary of the Housing Plan.

Table 9: Housing Plan

Housing Option	People Served	City Lead	City Cost	County Lead	County Cost	Timing
Coordinated entry plus services	26			26	\$880,800	May
Rapid Rehousing plus services	24	24	\$776,400			April
Housing Choice Vouchers plus services	50		\$566,900	50	\$1,664,600	TBD
Housing Problem Solving	4	4	\$127,600			TBD
Unknown	27					ongoing
Total	131	28	\$1,470,900	76	\$2,545,400	

The Housing Department estimates that it may take until the end of the September to relocate all 131 people from the Guadalupe site and the people living on the trail from Hedding to Taylor. To the extent that additional interim sites become available earlier – the timeline will be shortened.

- 3. Return through the budget process with a dedication of Measure E funding to ensure housing solutions (e.g., rapid rehousing dollars, hotel/motel vouchers) and priority within the coordinated entry system are available to all unhoused residents listed in the latest census count:**

- a. Once funding is allocated, disaggregate the construction timeline for Lot E from the abatement schedule;**
- b. Confirm that a portion of funds from the recent Safe Parking RFP is set aside to open a safe parking site on public or private land for the operational cars and/or RVs currently parked in the Guadalupe River Park and Gardens area.**

On February 15, 2022, the City Council held the first of two public hearings to initiate the process for approving changes to the spending priorities for Measure E Property Tax Revenue. A second public hearing, held on April 19, 2022, changed the spending priorities. The revised priorities allow for expanded funding for homeless programs and services, including any housing options for those individuals at Guadalupe Gardens, as described in Item (1) above. The Housing Plan no longer relies on Lot E as the primary interim site to relocate people. The Housing Department will return to City Council on May 17, 2022 with a funding plan for Measure E funds that will provide the necessary resources to successfully implement the Housing Plan outlined in this memorandum. The proposed budget outlined in Table 9 only provides funding for the people who have completed a housing assessment, however an additional \$1 million will be included in the Measure E funding plan to address the housing needs of the people who have yet participated in a housing assessment.

Finally, the Housing Department is using American Rescue Plan funds and state Housing and Homeless Assistance Program funds to operate a safe parking site with priority given to vehicles and RVs from Guadalupe Gardens.

4. Return to Council by April 2022 with a clear timeline to open the safe parking site and refer residents from Guadalupe River Park.

The Housing Department is also working on establishing two safe parking programs, one site focused on RVs to be operated by LifeMoves, and a second site focused on vehicles to be operated by Amigos de Guadalupe. For the first site, the Housing Department is in negotiations with Santa Clara Valley Transportation Authority (VTA) for the use of one of their parking lots in south San José to serve RV occupants. The Housing Department has submitted a preliminary application to VTA and is awaiting approval. The Housing Department and VTA have met several times and have come to an agreement on the general terms of use. The Housing Department recommends the site for RVs and estimates the lot can accommodate 60 RVs. The parking lot will need site preparation – specifically fencing, temporary electrical, signage and striping. Public Works is in the process of developing the plans and specifications for the site preparation project and anticipates the site will be ready by Fall 2022, pending any bid protests or significant construction related delays. Resources previously allocated in the American Rescue Plan Fund for homeless sheltering and support are expected to be sufficient to facilitate this work. In the meantime, the Housing Department will finalize an agreement with VTA and execute a contract with LifeMoves for services. The Housing Department is also working with Council District 10 to host a community outreach meeting in mid-June.

The City Manager's Office and Housing Department are also working on identifying a second site that will be operated by Amigos de Guadalupe for vehicle safe parking. A potential City site is currently under evaluation. Additionally, in response to a Board of Supervisors referral, OSH is identifying sites across the County for either safe parking or emergency interim housing. If a site is identified in the city, OSH will develop a community outreach plan and coordinate with the City Administration.

- 5. Implement direction from the October 15, 2021 memo to clear all vehicles from parkland by June 30, 2022 in Phase 3 and along the river by:**
- a. Prioritizing clearing vehicles that are on the trail;**
 - b. Directing operable vehicles to move to Spring Street (or a safe parking site);**
 - c. Working with residents to repair inoperable vehicles that need minor fixes or assisting with administrative issues, such as expired registration; and**
 - d. Allowing for the towing of inoperable vehicles from parkland.**

In February 2022, the BeautifySJ team began the process of informing residents with operable vehicles located on the trail between Hedding and Taylor to relocate vehicles from the trail area to the transitional parking located along Spring Street. Inoperable and stripped vehicles that have not been removed by the end of March 2022 will be tagged for towing. BeautifySJ is prioritizing the removal of both operable and inoperable vehicles from the trail area.

The process of removing all vehicles from the trail will take place over a three-month period as the City will need to coordinate with the City-contracted tow operators to remove and store the anticipated volume of vehicles without impact to other City-Generated tow operations. BeautifySJ is coordinating with the Code Enforcement Division (who administers the City-Generated Tow Agreements) to ensure proper communication and coordination with tow operators on the scope, timelines, equipment, and resources required to support this project. Ideally, the removal of the vehicles will be followed by the installation of deterrents funded by the Vehicle Prevention Project.

- 6. Ensure by June 30, 2022 there will be unhindered public use of the creek trail from West Hedding to West Santa Clara.**

Staff is developing plans for the Guadalupe River Trail Vehicle Prevention Project from Santa Clara Street to Hedding Street. Design development is underway, and staff believes construction bidding could occur in September 2022. The City Manager's Budget Office and PRNS anticipate that the approximately \$1.2 million estimated for implementation of the vehicle prevention program can be reallocated from either current year PRNS departmental savings and/or savings from the current year budget for BeautifySJ within the American Rescue Plan Fund. The cost of project design and construction is currently being refined. Without additional monitoring or enforcement during the time between removal of the vehicles and installation of the deterrents, staff may not be able to adequately prevent re-encampment or illegal dumping, thus as part of the development of the 2022-2023 Proposed Operating Budget, in addition to bringing forward a recommended budget allocation for the Guadalupe River Trail Vehicle Prevention Project

(approximately \$1.2 million), staff will also determine the feasibility of adding funding for patrols along the creek and deterrents.

The Housing Department worked with HomeFirst and PATH to conduct an initial census of the area, counting tents, vehicles and individuals. Table 10 below summarizes the findings.

Table 10: Census Count Guadalupe River Trail

	Hedding to Taylor	Taylor to Coleman	Coleman to Julian	Julian to Santa Clara	Parking lot under 87 – San Fernando	Total
# of people	17	13	12	12	6	60
# of tents/structures	35	13	19	16	15	98
Operable vehicles	19	2	0	0	0	21
Inoperable vehicles	10	0	0	0	1	11

The individuals encamped in the trail stretch from Hedding to Taylor will be housed as part of the Housing Department's efforts for Stage 3. The remaining 43 individuals that live between Taylor and Santa Clara have not all been assessed for their housing need and are not included in the Housing Plan outlined in Table 9. If the City Council provides direction to house the individuals in this area, the Housing Department will need to conduct housing assessments (VI-SPDAT) for each individual and then bring forward for City Council approval a project scope that includes, housing needs, budget, and timeframe for completion.

7. Return during the Encampment Management discussion on April 12 to determine if an extension of the June 30 date is needed or not.

Based on the timelines for housing and safe parking opportunities and to minimize increased encampments in the waterways, parks and neighborhoods across the city, the recommendation by the Airport, PRNS Department and the Housing Department is to fully abate Stage 3 of Guadalupe Gardens no later than September 30, 2022. To effectively manage the site through September 2022, BeautifySJ plans to implement weekly dumpster days in addition to the current twice weekly trash pick-up, starting in April 2022. Staff strongly recommends that the focus of operations continue between now and June 30, 2022 on the abatement of inoperable vehicles and the intense work of downsizing large, expansive encampments and the subsequent debris removal through monthly ongoing escalated clean ups.

8. Receive feedback on the Prototype Park Concept Plan and Vehicle Prevention Project and Identify ongoing operating, programming and stewardship costs needed to implement the Prototype Park Concept Plan with the Guadalupe River Park Conservancy or through a Request for Proposals Process.

During the February 8, 2022 City Council meeting, staff heard support for the idea of a dog park at the Guadalupe Gardens area. Staff is conducting a follow up survey to solicit additional public feedback on all the Prototype Park uses (i.e., dog park, disc golf, urban agriculture, walking paths and meadows, community gardens) and a community meeting was held on April 4, 2022.

Future uses of the Prototype Park area will be informed in part by the condition of soils at the site. A Phase I Environmental Site Assessment has been completed, and a Phase II Assessment is underway with results expected in late spring 2022. Uses of the site will be re-evaluated based on the results of that work.

In anticipation of favorable soil sampling, staff is working on the design of a prototype dog park. Funding for portions of this work are coming from Airport Capital Funds, in alignment with preventing re-encampment at the site. Work is ongoing with Silicon Valley Disc Golf and they continue to be an interested partner for this site. Use of this site for urban agriculture and community gardens will be explored after results of soil samples are available, and site conditions can be more fully assessed. Depending on soil conditions, use of above ground agricultural methods may be recommended.

Finally, the Administration will recommend resources as part of the 2022-2023 Proposed Budget to increase the level of maintenance activities for Guadalupe River Park to improve the availability and accessibility of this important City asset to the public.

CONCLUSION

The PRNS and the Housing Departments have made significant progress in planning, operating, expanding and evolving the City's Encampment Management Strategy. Looking ahead, this strategy will continue to evolve as we identify and respond to emerging challenges such as increasing demand for vehicle towing related to BeautifySJ efforts, and the need for expanded access to trash hauling sites to keep up with the increasing volume of trash collected. We will continue to grow our Encampment Management Collaborative and involve key internal staff and include community stakeholders to normalize our standard operating procedures, and to facilitate inter-department and inter-jurisdictional communication, planning, and problem solving. In addition, communication efforts are underway to build understanding and tolerance of the Encampment Management Strategy as opportunities to relocate unhoused residents are identified.

Work continues on the Guadalupe Gardens encampment abatement and rapid rehousing efforts, but an extension of the Guadalupe Gardens cleanup to no later than September 30, 2022 to align with opening of relocation opportunities is needed. Work associated with the Guadalupe River Trail Vehicle Prevention Project and development of the Prototype Park continues and additional resources for this work will be recommended in the 2022-2023 Proposed Budget.

Attachment A is the work plan for the next six months (April – September 2022).

EVALUATION AND FOLLOW-UP

The Housing Department will return to the City Council in May with a funding plan for Measure E that includes funding to implement the Housing Plan as detailed in this memorandum. If the City Council approves the staff recommendations and the Measure E funding plan in May, the Housing Department will return before the end of the fiscal year with an amendment to the County contract to increase their award so the Housing Plan can be implemented. To ensure progress in implementing the City Council Roadmap Priority - Encampment Management and Safe Relocation Policy, staff will report quarterly Objectives and Key Results related to the work plan through the City Manager's Office and return to the City Council in fall 2022 with outcomes of the Guadalupe Gardens activities.

CLIMATE SMART

The recommendation in this memorandum has no effect on Climate Smart San José energy, water, or mobility goals.

PUBLIC OUTREACH

This memorandum will be posted on the City's website for the May 3, 2022, City Council meeting.

COORDINATION

This memorandum was coordinated with DOT, the Environmental Services Department, the City Attorney's Office, the City Manager's Budget Office, and the City Manager's Office.

COMMISSION RECOMMENDATION/INPUT

This item will not be presented at a City commission.

HONORABLE MAYOR AND CITY COUNCIL

April 29, 2022

Subject: City Roadmap - Encampment Management and Safe Relocation Policy

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CEQA

Not a Project, File No. PP17-009, Staff Reports, Assessments, Annual Reports, and Informational Memorandums that involve no approvals of any City action.

/s/

JACKY MORALES-FERRAND
Director, Housing Department

/s/

JON CICIRELLI
Director, Parks, Recreation, and
Neighborhood Services

For questions, please contact Andrea Flores Shelton, Deputy Director of Parks, Recreation, and Neighborhood Services, at andrea.floresshelton@sanjoseca.gov or Ragan.Henninger@sanjoseca.gov, Deputy Director, Housing Department.

Attachment A: Timeline for Encampment Management Strategy Work

Attachment A: Timeline for Encampment Management Strategy Work

(Q2) Oct. – Dec. 2021	2.1 Create Objectives, Key Results (OKR) with CMO for City RoadMap process.	Completed
	2.2 Develop performance management system to assess Encampment Management objectives and outcomes.	Ongoing
	2.3 Conduct Phase 2 outreach, clean-up, and abatement activities at Guadalupe Gardens Airport land, monitor expenses.	Completed
	2.4 Begin weekly encampment trash pickup at sites, upon completion of accelerated hiring Community Coordinators and Maintenance Worker IIs.	Q4
(Q3) Now Jan – March 2022	3.1 Deliver annual report on BeautifySJ including proposed performance metrics, logic model with outcomes.	Moved to August 2022
	3.2 Formalize technical and policy teams of system providers and partners with Housing Department to assess, respond and determine disposition of non-compliant, high risk encampment residents.	Moved to Q1 (1.3)
	3.3 Implement SOAR site expansion in coordination with Housing Department to develop services for residents residing in RVs and vehicles.	Moved to Q4
(Q4) Next April – June 2022	4.1 Begin weekly encampment trash pickup at sites, upon completion of accelerated hiring Community Coordinators and Maintenance Worker IIs.	On track
	4.2 Return to Council with Encampment Management and Safe Relocation protocols and, any enabling actions for consideration and adoption.	May 2022
	4.3 Update plan to remove inoperable vehicles from Guadalupe River Trail. Conduct final phase of abatement at Guadalupe Garden pending Council direction.	By June 30, 2022
	4.4 Coordinate Guadalupe Gardens resident relocation efforts with several workstreams.	Ongoing
	4.5 Launch the Encampment Management Collaborative with various coordination and implementation teams	By June 30, 2022
	4.6 Complete the scope of work for the BeautifySJ program evaluation	June 2022
(Q1) Later FY 22/23 July – September 2022	1.1 Implement dedicated bi-weekly trash service for waterways in Direct Discharge focus zones.	August 2022
	1.2 Assess service modality with DOT including bio-waste needs for RVs and lived-in vehicles and address procurement funding.	July/Aug 2022
	1.3 Bid out the BeautifySJ Program Evaluation Scope.	July/August 2022
	1.4 Continue to develop partnership agreements with Interagency partners to address blight citywide.	September 2022
	1.5 Select sites for SOAR Program expansion and program implementation.	August 2022