

Audit **REPORT**

Performance Audit of Illegal Dumping: Improvements to the Accessibility of Legal Waste Disposal and the City's Enforcement and Remediation Policies and Operations Could Help Alleviate Oakland's Illegal Dumping Problem

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April 23, 2026

RE: Performance Audit of Illegal Dumping

Residents of Oakland, Mayor Lee, Council President Jenkins, Members of the City Council, City Attorney Richardson, and City Administrator Johnson,

Our Office has completed an audit of the City's efforts to prevent and mitigate illegal dumping. The audit report titled, *Performance Audit of Illegal Dumping: Improvements to the Accessibility of Legal Waste Disposal and the City's Enforcement and Remediation Policies and Operations Could Help Alleviate Oakland's Illegal Dumping Problem*, is enclosed. We initiated this audit in 2024 in response to resident requests.

The objectives of this audit were to identify potential sources of illegal dumping (by way of incentives that may increase the likelihood and occurrence of illegal dumping) in Oakland, evaluate the City's use of resources to promote effective illegal dumping clean ups and enforcement, identify workload and/or process improvements for removing illegally dumped waste, citing violators, and/or preventing recurrent dumping, and to assess accessibility and familiarity with services that mitigate illegal dumping. The audit reviews data from 2019 through 2025, though data as early as 2013 is presented to visualize trends.

We found that legal waste removal should be more convenient and affordable to Oaklanders, in line with the literature on illegal dumping prevention. Specifically, we found that most illegally dumped waste in the city appears to be residential in origin, and that curbside waste hauling rates are higher in Oakland than other local jurisdictions, including those served by the same waste hauler. Oakland's rates were between 23 and 40 percent higher than the average cost for other neighboring jurisdictions that contract with Waste Management.¹ We also found that free bulky waste pick-up, for items such as furniture, tires, appliances, mattresses, or carpets, appear to be underused by multi-family residential units, and that discounted service rates are not currently available to renters. Last, we found the dumpsters the City receives for community use were underused, with between 71 and 87 20-cubic-yard dumpsters unused annually between 2023 and 2025.

¹ This range is based on auditor analysis of single-family 2024-2025 Waste Management rates for minimum service 3 containers (with 20 gallons trash) in Oakland, Albany, Hayward, Oro Loma, and Emeryville. As a note, Oakland contracts with CWS for residential recycling service and Waste Management subcontracts with TriCED for residential recycling service in Hayward. We compared single-family rates, as some other local Waste Management jurisdictions do not offer multi-family service. For comparative purposes, all benchmark jurisdictions also receive, at a minimum, one to two free bulky pickup appointments annually, although other contract benefits may vary.

We also found that the City can strengthen its enforcement of illegal dumping through legislative changes and improved regional collaboration – and the City has begun to do so. During the audit, the Mayor announced a forthcoming proposal to the City Council to implement a commercial special assessment. This will help to align the process to ensure mandatory waste disposal for commercial properties with that of residential properties. Additionally, at the time of this report, the City Council is considering higher penalties in line with those recommended by Alameda County’s Draft Ordinance. The City can benefit from further collaboration with the County, especially the District Attorney’s Office.

Finally, we found that while the City’s illegal dumping clean up appears to have been effective and timely,² 311 reporting should be more accessible to meet the requirements of the City’s Equal Access Ordinance, and the City’s Environmental Enforcement Unit needs clear strategies, procedures, and performance management. In reviewing the City’s illegal dumping enforcement efforts, we identified weaknesses in the Environmental Enforcement Unit’s (EEU’s) internal controls, or mechanisms that help ensure an organization meets its goals, including low staff resources, lack of training, unclear authorities, and gaps in processes for prosecution. Our review identified issues with employee direction and supervision stemming from the lack of written goals and policies and procedures. We also found that performance data was not regularly used by management, and that the development and evaluation of enforcement strategies – such as for enforcement camera deployment – would promote program effectiveness. According to the U.S. Environmental Protection Agency’s Illegal Dumping Guidebook, effective illegal dumping prevention requires an integrated approach, including site maintenance and controls, community outreach and involvement, targeted enforcement, and program measurement. The City can improve its service delivery through coordinated community outreach and collaboration between departments, including Public Works, Finance, Code Enforcement, and the Police Department.

Illegal dumping negatively affects the health, safety, environment, property, and economic well-being of Oaklanders. This audit provides 17 recommendations to improve the access and ease of use of legal waste disposal, strengthen legal enforcement mechanisms of the City, improve internal organization of the Public Works Department’s Environmental Enforcement Unit, improve interdepartmental collaboration, increase education and outreach related to waste disposal and cleanups, and increase accessibility of 311 reporting.

We thank the City Administration, including staff in the Public Works Department, City Administrator’s Office, Police Department, and the Finance Department for their cooperation and insight during the audit process. I would also like to thank Director Josh Rowan of the Department of Transportation, who served as interim Public Works Director during much of this audit, staff in the City Attorney’s Office, and members of the City Council and community who provided their perspective and expertise. Our report benefited greatly from the ongoing engagement and feedback we received.

Sincerely,



Michael C. Houston
City Auditor

² As described within Finding 3, clean up crew responses to illegal dumping requests slowed in 2025. Public Works leadership attributed this to a change toward a proactive rather than responsive model and switched back to a 311-complaint based response. In 2024, illegal dumping clean up crews’ average monthly median time to resolve an illegal dumping request was two business days.



REPORT HIGHLIGHTS

Performance Audit of Illegal Dumping: Improvements to the Accessibility of Legal Waste Disposal and the City's Enforcement and Remediation Policies and Operations Could Help Alleviate Oakland's Illegal Dumping Problem

Background

Illegal dumping has long been a problem in Oakland, negatively affecting health, safety, the environment, property, and economic well-being. We completed this audit of illegal dumping based in part on concerns of Oakland residents. The objectives of this audit were to identify potential sources of illegal dumping (by way of incentives that may increase the likelihood and occurrence of illegal dumping) in Oakland, evaluate the City's use of resources to promote effective illegal dumping clean ups and enforcement, identify workload and/or process improvements for removing illegally dumped waste, citing violators, and/or preventing recurrent dumping, and to assess accessibility and familiarity with services that mitigate illegal dumping.

What We Found

We found that illegally dumped waste was mostly residential in origin, and legal waste removal should be more convenient and affordable to Oaklanders to reduce illegal dumping. We also found that multi-family units underused free bulky pickup services. The City can strengthen its enforcement of illegal dumping through legislation to align enforcement of the City's municipal waste requirements for commercial buildings, and to increase penalties to be consistent with other jurisdictions in the region. The City can also improve regional collaboration, especially with the District Attorney's Office. We found that while clean ups appear to have been effective and timely, 311 reporting should be more accessible, and environmental enforcement needs established procedures, interdepartmental coordination, and performance management to support administrative enforcement.

What We Recommend

We made 17 recommendations to improve the access and ease of use of legal waste disposal, strengthen legal enforcement mechanisms of the City, improve internal organization of the Environmental Enforcement Unit, improve interdepartmental collaboration, increase education and outreach, and increase accessibility of 311 reporting.

Independent City Auditor. Reporting Directly to the Residents.

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INTRODUCTION AND BACKGROUND

Introduction

Illegal dumping negatively affects health, safety, the environment, property, and economic well-being. Studies have shown that remediating blighted properties, often marked by visible neglect such as illegal dumping, benefits community safety and mental health.¹ Blighted property is also associated with depressed home values, decreased tax revenue, and increased costs to local governments.²

Illegal dumping has long been a problem in Oakland. We completed this evaluation of the City's prevention efforts and response to illegal dumping based in part on concerns of Oakland residents.³ The objectives of this audit were to identify potential sources of illegal dumping (by way of incentives that may increase the likelihood and occurrence of illegal dumping) in Oakland, evaluate the City's use of resources to promote effective illegal dumping clean ups and enforcement, identify workload and/or process improvements for removing illegally dumped waste, citing violators, and/or preventing recurrent dumping, and to assess accessibility and familiarity with services that mitigate illegal dumping.

¹ Brian Cooke, "Going Local: A Place-Based Approach to Reducing Urban Gun Violence," *Forest Service Northern Research Station*, Spring 2018, <https://www.hsd.org/c/view?docid=812642>
Noah Daly, "Around the US, illegal dumping creates mental health challenges," *Environmental Health News*, February 5, 2024, <https://www.ehn.org/health-effects-of-illegal-dumping>

² The [EPA's 2025 Illegal Dumping Prevention Guide](#) describes negative effects of illegal dumping in greater detail.

³ Illegal dumping was the highest requested audit based on surveys issued in 2023 and 2025.

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Exhibit 1: A Large Pile of Illegally Dumped Waste in West Oakland



Source: Auditor photo taken March 6, 2025.

Background

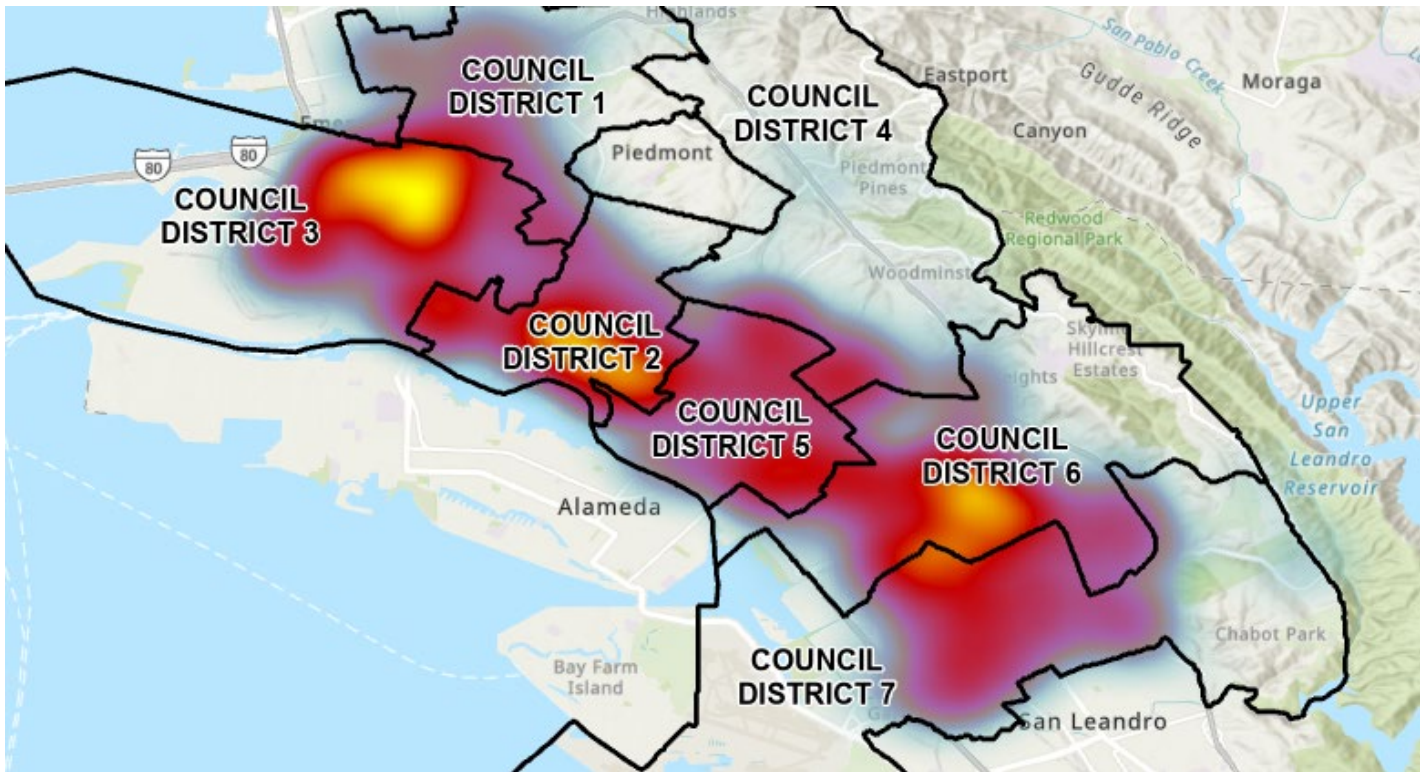
The Oakland Municipal Code (O.M.C. 8.11.200 (J)) defines illegal dumping as:

the willful, intentional, or negligent depositing, dropping, dumping, placing, or throwing of any waste matter onto public or private property that is not expressly designated for the purpose of disposal of waste matter.

Illegal dumping is pervasive throughout Oakland. The problem is apparent in both residential and commercial areas. The City received over 25,000 service requests relating to illegal dumping in 2025. On average, this amounts to about 70 illegal dumping clean up requests per day. Exhibit 2 shows where illegal dumping clean ups were most requested from January 1, 2019 through February 5, 2026. According to Oakland Municipal Code 8.11.330, illegal dumping is a misdemeanor crime; it is distinguished from littering, which is considered an infraction.

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Exhibit 2: Illegal Dumping Service Requests are Most Concentrated in Council Districts 3, 2, 6, and 7



Source: Auditor produced map of Public Works' illegal dumping service request data via Oakland Open Data, for January 1, 2019, through February 5, 2026. Yellow indicates a high volume of illegal dumping work orders. Clean up work orders primarily arise in response to 311 service requests.

The Department of Public Works Issues Citations for Illegal Dumping Violations in Oakland

Illegal dumping enforcement varies by severity. The City pursues:

- **Administrative citations** for waste not believed to be a commercial amount or contain harmful material.⁴
- **Civil penalties** for “major violations,” including those commercial in amount, containing harmful material, or instances in which the dumper has committed more than three acts of illegal dumping in a three-year period. Major violations also include dumped mattresses, furniture, appliances, and/or electronic waste.⁵

⁴ According to Oakland Municipal Code 8.11.200: “‘Commercial quantity’ means an amount of waste matter generated in the course of a trade, business, profession, or occupation, or an amount equal to or in excess of one cubic yard.”

⁵ O.M.C. 8.11 Article IV.

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Public Works staff look for evidence in the field to identify the perpetrators of illegal dumping and create administrative citations and civil penalties, which are non-criminal enforcement mechanisms. The amount of the citation is based on the cost to the City to enforce and abate.

In 2024, Public Works produced 691 citations for illegal dumping. People who receive citations have a right to appeal. Administrative staff facilitate payment of illegal dumping citations and review submissions for appeals processing, such as mitigating or exculpatory evidence like a police report to show the waste was from a car break-in or facilitating community service in lieu of a fine.

In instances that are not easily resolved and administrative staff cannot grant an appeal, an appointed independent hearing officer reviews appeals for administrative citations, under Oakland Municipal Code 1.12.080. Hearing officers review evidence collected by the City and counterevidence offered by the appellant.⁶ Public Works staff package any citations that are not successfully appealed and send them to the Finance Department for processing. Unpaid citations are sent to the Finance Department's Collections unit, under the Revenue Bureau.

In contrast to administrative hearings, criminal cases are sent to the Alameda County District Attorney's Office for prosecution and require a higher burden of evidence, such as witness testimony or clear surveillance footage of the illegal dumping incident.⁷

The City Spent Nearly \$12 Million on Illegal Dumping Clean Up in Fiscal Year 2024-25

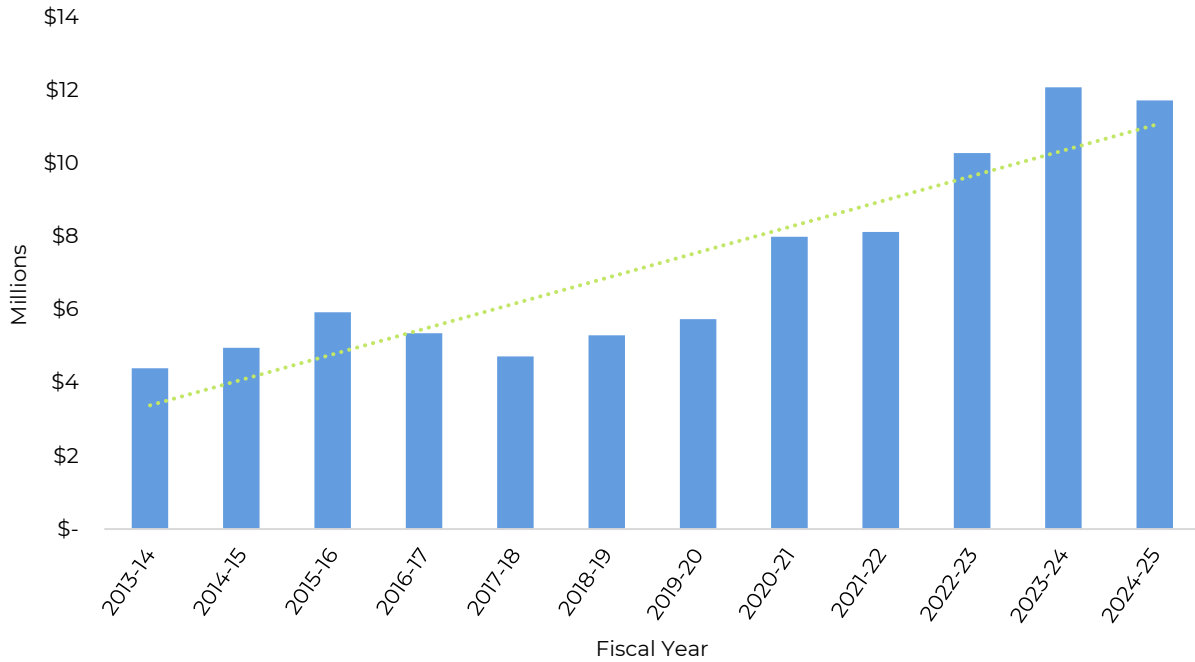
Illegally dumped waste costs the City a large sum annually. According to expenditure data from the City's financial management system, the City spent nearly \$12 million to clean up illegal dumping in Fiscal Year (FY) 2024-25. In FY 2024-25, more than \$2 million was additionally spent on environmental enforcement, investigating and citing for illegal dumping. The amount of money that the City has spent on illegal dumping clean ups has been rising, as shown in Exhibit 3.

⁶ As noted in Finding 3, the cost to the City of providing an independent hearing officer often exceeds the cost of the citations.

⁷ What constitutes sufficient evidence for criminal enforcement is at the discretion of the District Attorney.

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Exhibit 3: The Cost of Cleaning Up Illegal Dumping Has Been on the Rise



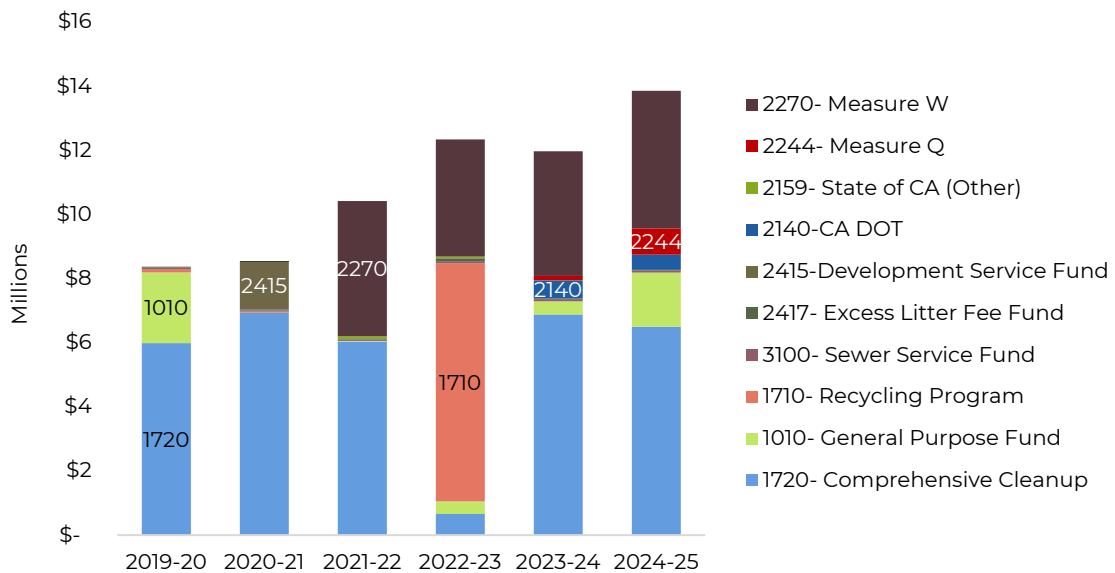
Source: Auditor analysis of expenditure data related to illegal dumping from Oracle, the City's financial management system. Note: This does not include environmental enforcement expenditures. Not adjusted for inflation.

Funding sources for illegal dumping clean up have varied over time, historically drawing largely from the General Purpose Fund and the Comprehensive Cleanup Fund as shown in Exhibit 4.⁸

⁸ The General Purpose Fund (1010) receives funding from most of the City's taxes, fees, and service charges and is used at the discretion of City Council. The Comprehensive Cleanup Fund (1720) receives funding from a solid waste franchise fee on refuse collection bills and is used for illegal dumping enforcement; street sweeping, custodial services and other clean up related activities.

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Exhibit 4: Funding Sources for Illegal Dumping Clean Up Have Varied Over Time



Source: Auditor analysis of expenditure data from Oracle, the City of Oakland’s financial management system. Note: Data does not include Funds 1250 (Paid Leaves), and 8000 (General Fixed Assets Account Group), as these are mostly negative expenditures. Minimal funding came from Measure KK (Fund 5332), an infrastructure-improvement bond, based on the need to clean up illegally dumped waste before a repaving project.

Oakland voters have passed two measures to help fund illegal dumping remediation:

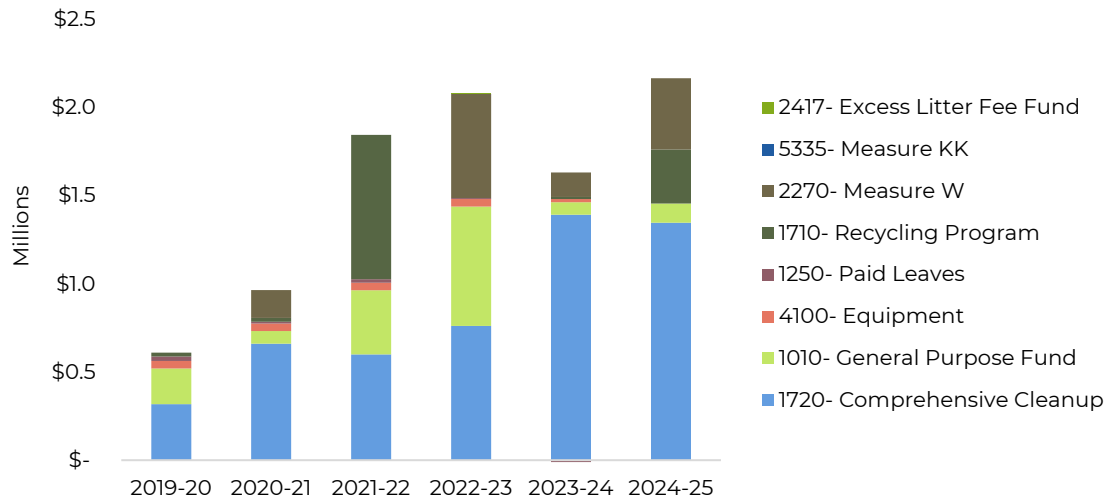
- In 2018, voters passed Measure W to impose a tax on vacant properties. Revenues from the Vacant Property Tax may be used for services and programs for homeless individuals, efforts to reduce homelessness, code enforcement and clean up of blighted properties and illegal dumping remediation, and the protection and production of affordable housing. The City is required to use at least 25 percent of the tax revenue for code enforcement, blight remediation, and the remediation of illegal dumping. Much of the funding from the Vacant Property Tax has gone towards illegal dumping clean ups citywide.
- In 2020, voters passed Measure Q, *The 2020 Oakland Parks and Recreation Preservation, Litter Reduction, and Homelessness Support Act*, to fund parks maintenance, homelessness support for people living on the streets adjacent to City parks, stormwater improvements, and projects to address water quality and litter reduction, including maintenance and cleaning of stormwater trash collection systems.⁹

Measure W and Measure Q have increased funding for illegal dumping clean up. Environmental enforcement expenditures have also trended upwards since 2019, as shown in Exhibit 5.

⁹ The Oakland City Auditor’s Office released an audit of Measure Q December 21, 2023. See https://www.oaklandauditor.com/wp-content/uploads/2024/03/20240312_Final_Measure-Q-Audit-Report-with-Administrations-Response-1.pdf. An audit of Measure W is forthcoming.

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Exhibit 5: Environmental Enforcement Expenditures Ranged from \$600,000 to \$2 Million Annually from FY 2019-20 through FY 2024-25



Source: Auditor analysis of expenditure data from Oracle, the City of Oakland’s financial management system. Note: Data does not include Fund 8000-General Fixed Assets Account Group, as this is a negative expenditure.

Funding for environmental enforcement has been sourced primarily through the General Purpose Fund and the Comprehensive Cleanup Fund. The Vacant Property Tax (Measure W) also began funding environmental enforcement in FY 2022-23.

Residents and Visitors Report Illegal Dumping through 311 or SeeClickFix, the City’s Online 311 Portal

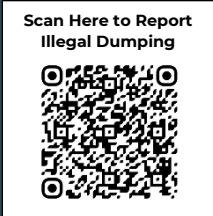
The City responds to reports of illegal dumping made by residents via 311 by phone, app, or online via SeeClickFix (see Box 1). Clean up crews may also clean unreported trash piles on route and during occasional ‘Garbage Blitz’ actions.¹⁰ The City Administrator’s Office houses the City’s 311 call center, which accepts and routes service requests from Oakland residents and visitors. This process is shown in Exhibit 6.

Box 1

Reporting Illegal Dumping

Illegal dumping can be reported by calling 3-1-1 or reporting online through Oakland’s 3-1-1 website, [SeeClickFix](https://seeclickfix.com/us-ca-oakland).

<https://seeclickfix.com/us-ca-oakland>



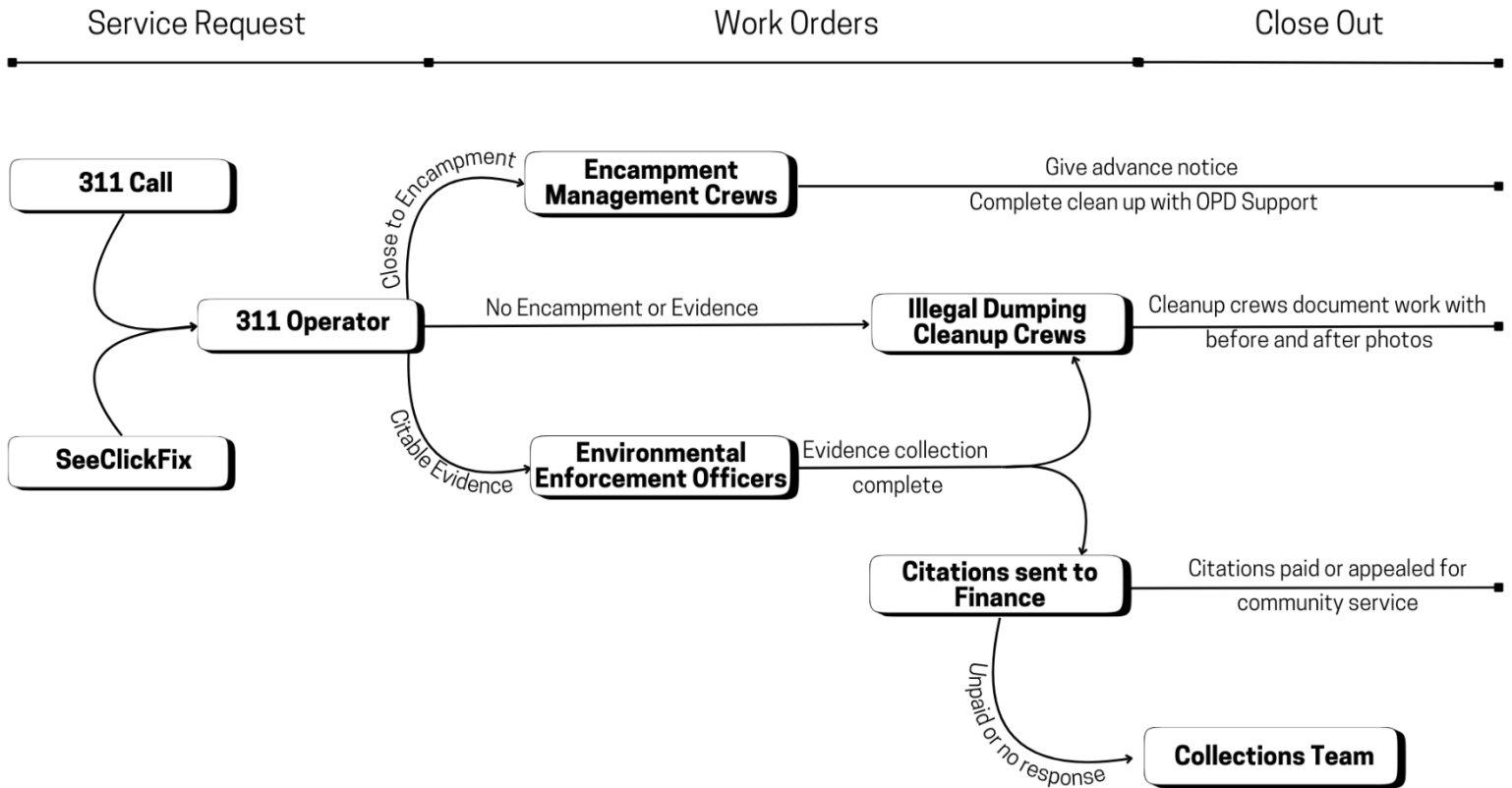
Scan Here to Report
Illegal Dumping

¹⁰ Garbage Blitz crews work proactively, moving block by block to pick up litter, rather than working in response to a service request. Illegal dumping clean up crew management noted that Garbage Blitzes could cause lapses in response time to illegal dumping service requests and that funding was diverted to the Encampment Management Team. More discussion on proactive clean ups is in Finding 3.

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311 reports are categorized according to information provided by the caller, such as whether the pile is on public or private property, near an encampment, or enforceable, then forwarded to the appropriate unit. Reports are marked “enforceable” if the reporter checks “yes” on seeing the person while they were dumping the materials and being willing to talk to the City Attorney’s Office to help hold the dumper(s) accountable.

Exhibit 6: Illegal Dumping Remediation and Enforcement Involves Multiple City Departments



Source: Auditor flow chart based on staff interviews. Note: this chart focuses on responsive work, which makes up the majority of City work on illegal dumping. Proactive work is not reflected in this flow chart.

Service requests are triaged by 311 staff, or the online SeeClickFix system, to different departments and divisions based on information within the service request:

- The Department of Public Works cleans up and investigates illegal dumping on **public property and the public right-of-way** along roads and sidewalks. Crews in Keep Oakland Clean and Beautiful (KOCB) clean up illegal dumping. The Environmental Enforcement Unit (EEU) investigates piles marked as enforceable.
- The Planning & Building Department’s Code Enforcement Services team (Code Enforcement) responds to dumping on **private property**. Code Enforcement inspectors verify and document 311 reported illegal dumping on private property, more commonly referred to as “property blight,” and give the property owner 30 days’ notice to abate (or clean up) the violation, according to Code Enforcement. The City Attorney’s Office reports that if the blight is not abated, further enforcement action is taken, which might involve

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an abatement warrant and the assessment of costs or other enforcement actions, including penalties.¹¹

- Illegal dumping **within or near encampments** is cleaned up by Public Works' Illegal Dumping and Encampment Management teams in collaboration with the Human Services Department (HSD), Oakland Police Department (OPD), Oakland Fire Department (OFD), and the City Administrator's Office (CAO). There are four different categories of clean ups: Health and Hygiene, Deep Cleaning, Partial Closure, and Closure.¹²
- The Oakland Police Department (OPD) has the **legal authority to issue citations and make arrests to enforce** local illegal dumping laws and ordinances. OPD's General Crimes Unit gathers evidence on illegal dumping considered enough to present to the District Attorney, relying on Public Works and Code Enforcement for the enforcement of infractions. The Alameda County District Attorney's Office decides whether to pursue criminal charges. OPD staff report that there is little capacity for OPD officers to patrol for illegal dumping and that the investigative arm for illegal dumping falls under Public Works.

Public Works Cleans Up Dumping in the Public Right-of-Way

Within Oakland Public Works, the Bureau of Environment houses the two divisions that manage illegal dumping clean up and enforcement in the public right-of-way: Environmental Services, which houses the EEU, and Keep Oakland Clean and Beautiful (KOCB) (see Exhibit 7).¹³ Staff from the EEU and KOCB's Illegal Dumping Unit are co-located at the same City service yard.

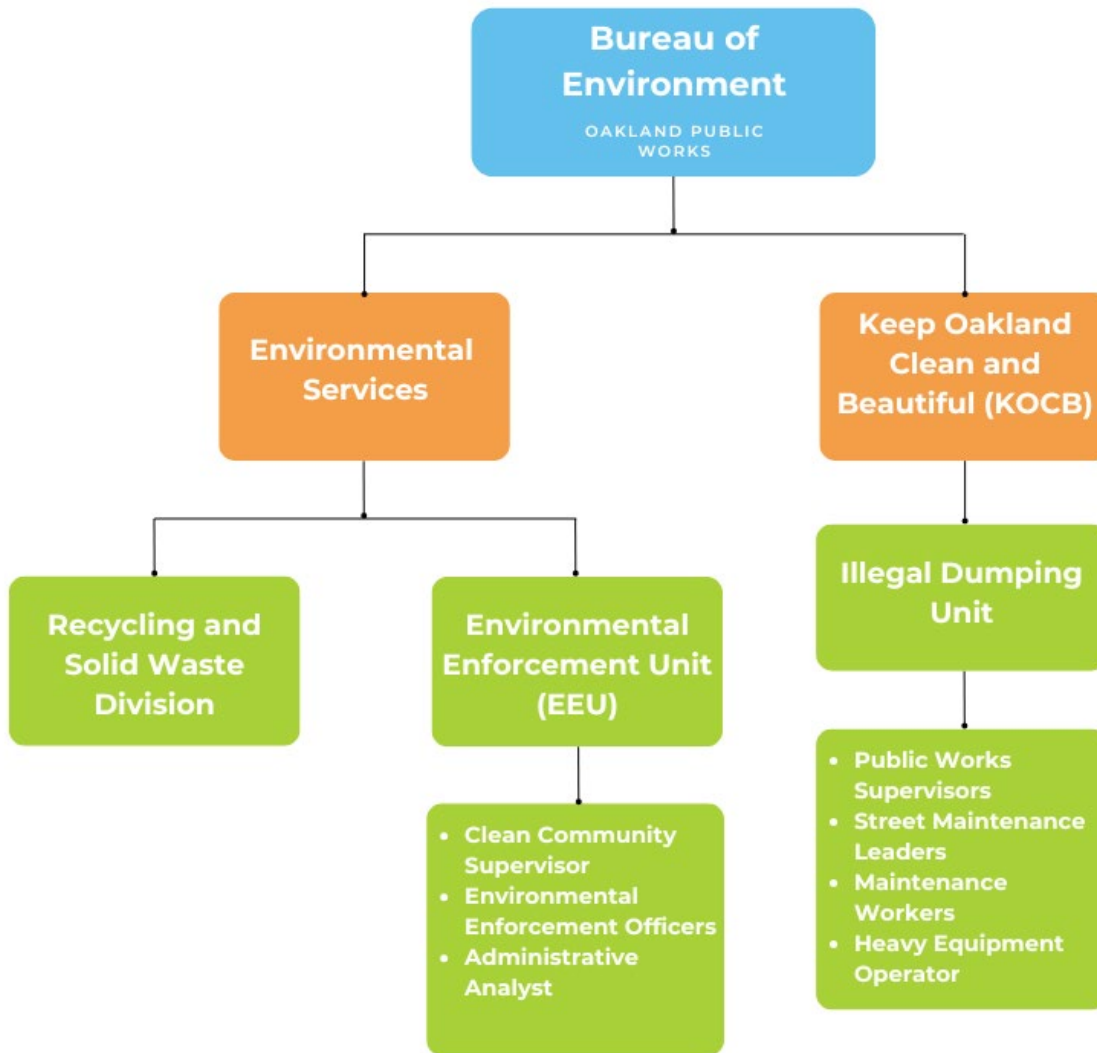
¹¹ According to City Attorney staff, penalties for property blight are not assessed unless there is a declaration of public nuisance.

¹² According to the City's Encampment Management Plan, unless it is an emergency, encampment residents must receive at minimum 72 hours' notice for all clean ups except health and hygiene. In practice, encampment residents typically receive two-weeks' notice. Encampment Management was outside the scope of this audit. For more information on Encampment Management, read our *2021 Performance Audit Of The City Of Oakland's Homeless Encampment Management Interventions & Activities* available online at https://www.oaklandauditor.com/wp-content/uploads/2021/04/20210414_Performance-Audit_City-of-Oaklands-Homeless-Encampment-Management-Interventions-and-Activities.pdf.

¹³ The Department reorganized these divisions; previously, they had both been within Keep Oakland Clean and Beautiful (KOCB).

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Exhibit 7: The Primary Illegal Dumping Enforcement and Clean Up Teams are Housed Within Public Works' Environmental Services and Keep Oakland Clean and Beautiful Divisions, Respectively



Source: Auditor produced organization chart based on Public Works organizational chart and position control reports (as of September 2025).

Oakland Public Works' EEU both responds to 311 requests and patrols assigned zones, investigating and citing illegal dumping on public property. In instances where property blight creeps onto public property, EEU staff may issue an order to abate.¹⁴

¹⁴ According to Code Enforcement leadership, property blight is the responsibility of the property owner, even in situations in which they are the victim of illegal dumping. Code Enforcement staff report that in these situations the property owner must independently pursue legal action against the dumpers with OPD. According to O.M.C 8.11.430, "Any person or entity, public or private, on whose property waste matter has been illegally dumped, may bring a civil action against a dumping violator. In addition, a duly established business improvement district, merchants' association, or business, community, or neighborhood association or organization that cleans up illegal dumping on behalf of its members may bring an action against a dumping violator to recover its costs of removal."

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The Department of Public Works Manages the City's Waste Hauling Contracts

The City contracts with Waste Management (WM) and California Waste Solutions (CWS) for curbside hauling of trash, recyclables, and organics. The Solid Waste and Recycling Division within the Environmental Service Division of Public Works manages these contracts. Under the current contract, Waste Management and California Waste Solutions split hauling rights.

Waste Management is contracted to provide:

- residential curbside mixed waste (trash) and organics (compost) hauling service;
- commercial curbside mixed waste, organics, and may provide recycling hauling service;
- two free bulky pickup appointments per single-family residential unit and one free bulky pickup per multi-family residential unit of up to four yards of volume (the cost of which is covered by regular curbside service fees);
- one free self-haul drop-off appointment per residential unit;
- services for street litter bins and City buildings; and
- dumpsters for events by the City Council and Mayor and City events.¹⁵

California Waste Solutions is contracted to provide residential curbside recycling service.¹⁶ Commercial recycling is an open market, and businesses may choose their recycling hauler.

The term of the current Waste Management contract ends in 2030, and the City has options to negotiate the terms of renewal or consider a Request for Proposal for other service providers.

According to the Oakland Municipal Code 8.28, only the City's authorized waste collectors or their workers can collect or haul trash, organics, recyclables, or bulky items unless someone qualifies for specific exceptions: people with self-haul permits, landscapers handling waste from their own work, businesses hauling specific by-products, City crews, or others with special permission from the City. Excepted cases include transporting waste to proper facilities, donating compost, removing bulky goods after a sale, or handling materials not accepted by the City's service per City ordinances and Waste Management regulations.

Property owners or occupants may opt out of curbside service and self-haul their own waste, organics, and recycling to approved facilities if they obtain a permit from the City, follow specific rules, and pay an annual fee. The City can revoke the self-haul permit for non-compliance and repeat violators may be barred from reapplying for a year or face stricter conditions.¹⁷ According

¹⁵ Auditor summary of the 2015 Mixed Materials & Organics Collection Services Contract Executed between the City of Oakland and Waste Management of Alameda County, Inc. Articles 5, 6, 9, 10, 11 and 12 and 2021's Revised Exhibit 14: Bulky Goods Collection Service Agreement; and the 2015 Residential Recycling Collection Service Contract Executed between the City of Oakland and California Waste Solutions, Inc and Oakland City Council Ordinance 13255.

¹⁶ During the course of this audit, the executives of California Waste Solutions (CWS) were under criminal investigation. We did not include CWS recycling services within the scope of the audit.

¹⁷ Permit holders must use permitted facilities, maintain records, allow inspections, and comply with O.M.C. 8.28.147.

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to Public Works staff, very few self-hauling permit requests are approved by the City, with one permit currently active. Residents may take their own waste, in addition to their regular curbside service, from their property to the Davis Street Transfer Station or the Altamont Landfill without a permit as described in Finding 1.

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Finding 1: Legal Waste Removal Should be More Convenient and Affordable to Oaklanders

Summary

Legal waste disposal appears to be inaccessible, either due to cost or inconvenience, for many Oakland residents, contributing to a large volume of illegally dumped residential waste on Oakland streets and sidewalks. Other local jurisdictions are charged less for similar hauling services, even by the same hauler. Additionally, bulky waste disposal services are not used to their full potential, especially by multi-family residences. Finally, dumpsters allotted to City Councilmembers and the Mayor within the current contract with Waste Management are underutilized, representing a loss of allotted legal waste disposal to the City. This finding presents what currently makes legal waste disposal inconvenient in Oakland, potentially contributing to illegal dumping. According to the U.S. Environmental Protection Agency (EPA)'s 2025 Illegal Dumping Prevention Guide, ensuring that legal and affordable waste management and recycling options are as accessible as possible can prevent illegal dumping. To ensure waste hauling services are more accessible, the City should pursue waste hauling services with a lower cost per volume and rate transparency. The City should also assess options for subsidized low-income waste hauling, increase outreach for bulky pickup services, and ensure existing contract benefits are used.

Best Practices Highlight Convenient Legal Waste Disposal as a Preventive for Illegal Dumping

According to CalRecycle's (California's Department of Resources Recycling and Recovery) Illegal Dumping Toolbox, making legal waste removal convenient and illegal dumping inconvenient prevents and reduces illegal dumping. This is also reflected by the EPA's 1998 Illegal Dumping Prevention Guidebook: dumping is higher in areas with less convenient and affordable access to legal waste management and areas with more vacant properties.¹⁸ The 2025 EPA Guide also states that illegal dumping can be prevented by ensuring that as many businesses and individuals as possible are able to access proper and affordable waste management and recycling options. The 2025 Guidebook also states that areas with unaffordable waste hauling service and high landfill or transfer station disposal fees tend to have higher incidences of household waste dumping.

Most Illegally Dumped Waste Appears Residential in Origin

Waste Management reported that they collected 244,470.72 tons, or nearly 500 million pounds, of legally disposed waste in Oakland in 2025.¹⁹ In FY 2023-24, Keep Oakland Clean and Beautiful

¹⁸ The EPA released a new Illegal Dumping Guide in June 2025 based on EPA's 1998 Illegal Dumping Prevention Guidebook and updated with supplementary information. We reference both guidebooks throughout this report.

¹⁹ Waste Management produces a monthly report for the City on the services received by the City, including tonnage collected.

(KOCB) crews picked up 5,460 tons, or over 10 million pounds, of illegally dumped waste. In FY 2024-25, KOCB crews picked up 3,617 tons, or over 7 million pounds, of illegally dumped waste.²⁰

According to Public Works, waste generated in Oakland is about half residential and half commercial, construction and demolition, or self-hauled in origin.²¹ Currently, in Oakland, illegally dumped waste appears to be largely residential in origin. We observed piles throughout the city containing furniture, clothing, diapers, food scraps, and other household waste (see Exhibit 8). Throughout the City, we observed household waste more frequently than piles containing apparent commercial or construction and demolition waste.²² Both Public Works and Waste Management staff reported that waste piles are mainly composed of residential materials.

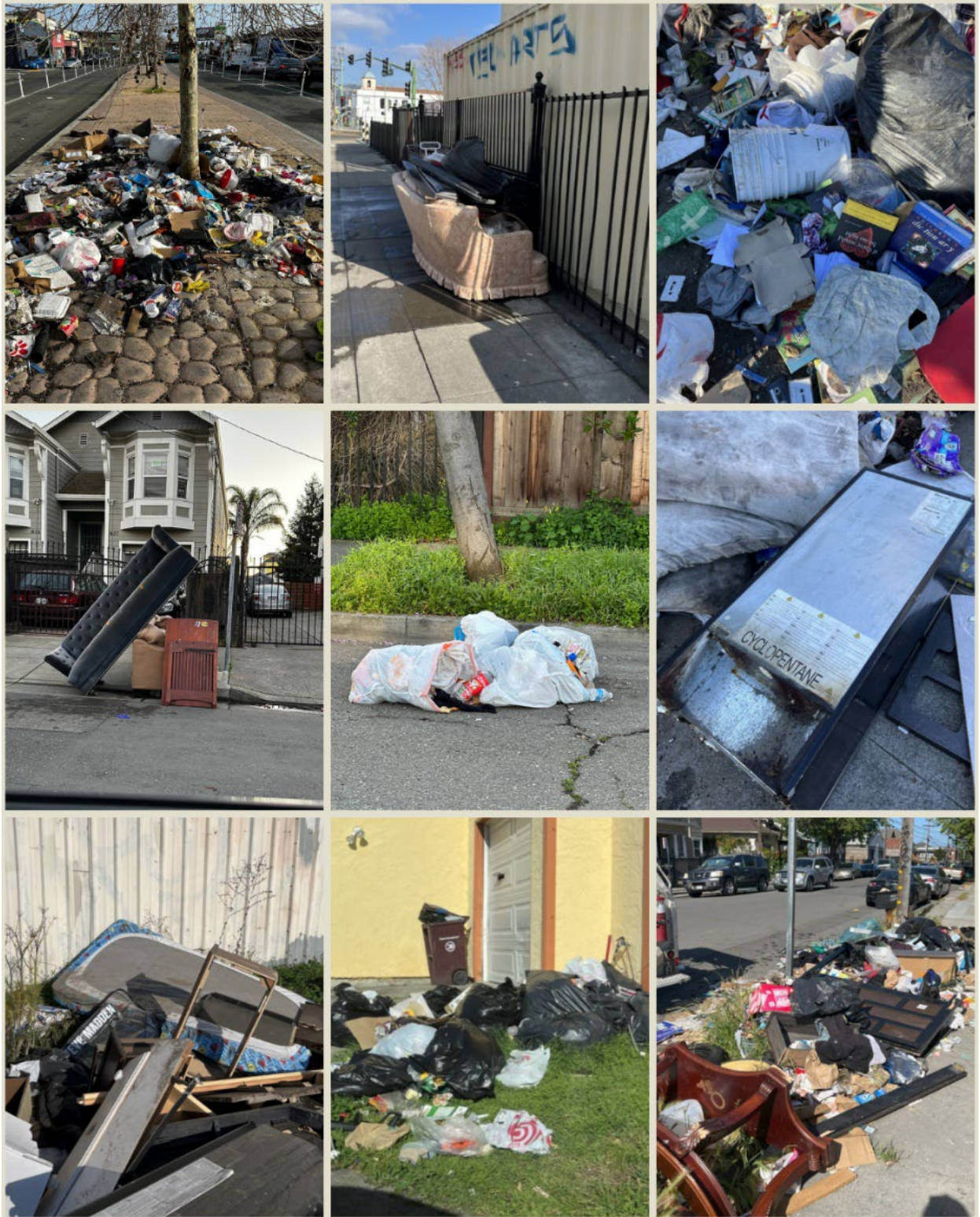
²⁰ These figures do not include tonnage of waste picked up from encampments. Public Works crews picked up 4,552 and 5,428 tons of waste from encampments in 2023-24 and in 2024-25, respectively.

²¹ "Informational Report on Equitable Illegal Dumping Efforts," Presented to the Public Works & Transportation Committee on March 26, 2024. <https://oakland.legistar.com/View.ashx?M=F&ID=12759240&GUID=8BF328AF-C450-43B1-8002-A5DB178C8106>

²² We went into the field five times between January and May 2025 and observed illegal dumping of mostly residential material in West Oakland, North Oakland, near Downtown, and in East Oakland along International Blvd.

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Exhibit 8: Most Illegally Dumped Waste Piles Contained Residential Garbage, such as Diapers, Furniture, Food Scraps, Books, and Mail



Source: Auditor photographs from field observations between October 2024 and September 2025.

Legal Waste Removal is More Expensive in Oakland than in Other Jurisdictions

As mentioned above, according to CalRecycle’s Illegal Dumping Toolbox, making legal waste disposal convenient and illegal dumping inconvenient helps prevent and reduce illegal dumping.

Legal waste removal in Oakland can be made more affordable and convenient. In comparing Oakland’s curbside hauling rates to neighboring jurisdictions, we found that Oakland residents pay more per volume for similar Waste Management service as other nearby jurisdictions (see Exhibit 9). According to CalRecycle, in a 3-container system, residents and businesses must separate organic waste, recyclables, and items going to a landfill.

Exhibit 9: Curbside Hauling Rates in Oakland Are Between 23 and 40 Percent Higher Than the Average Cost for Neighboring Jurisdictions that Contract with Waste Management

	3 container 20 gallon	3 container 32 gallon	3 container 64 gallon	3 container 96 gallon
Oakland Cost	\$53.36	\$60.57	\$106.57	\$160.27
Average Cost	\$38.07	\$49.07	\$86.62	\$125.73
Oakland percent above average	40%	23%	23%	27%
Difference between Oakland and Average	+\$15.29	+\$11.50	+\$19.95	+\$35.54

Source: Auditor analysis of single-family 2024-2025 Waste Management rates for 3 container service (with 20 gallons trash) in Oakland, Albany, Hayward, Oro Loma, and Emeryville. Note: Albany and Emeryville include the cost of recycling and organics service in their solid waste rates. Hayward and Oro Loma charge a flat rate per unit for recycling and organics. Oakland includes organics service in their solid waste rates and the cost of recycling service is a flat rate per unit. Additional hauling services included in contracts vary.

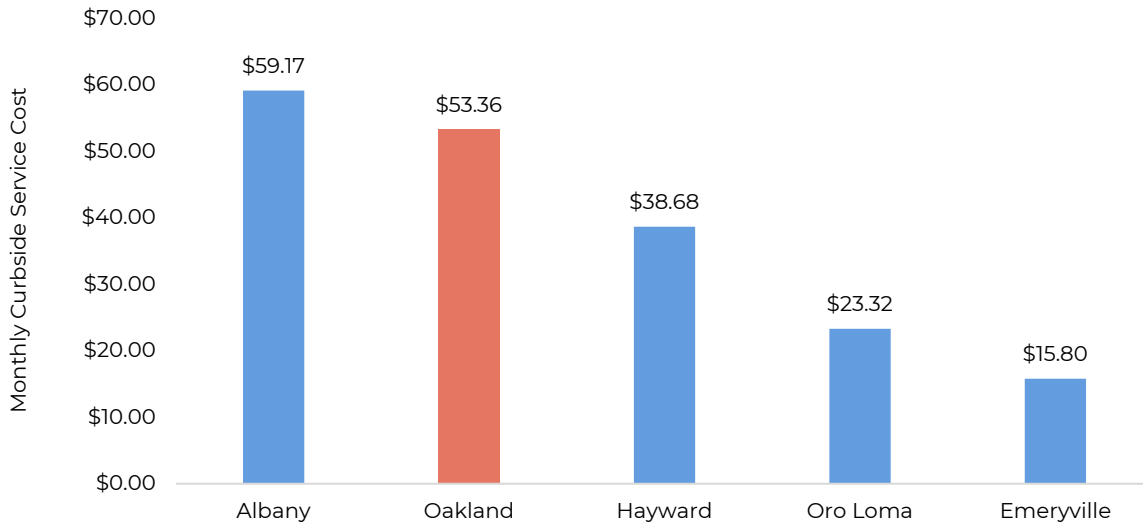
While Oakland’s single-family hauling rates are higher than those of other Bay Area jurisdictions served by the same hauler,²³ transfer station, and landfill it should be noted that other services, such as hauling for street litter bins and city buildings, may differ. Oakland residents, on average, paid about \$15 per month more for minimum service than single-family homes in other local jurisdictions with Waste Management service (see Exhibit 10).²⁴

²³ We benchmarked other local jurisdictions served by Waste Management. As a note, Oakland contracts with CWS for residential recycling service and Waste Management subcontracts with TriCED for residential recycling service in Hayward.

²⁴ We compared single-family rates, as some other local Waste Management jurisdictions do not offer multi-family service. For comparative purposes, all benchmark jurisdictions also receive, at a minimum, one to two free bulky pickup appointments annually, although other contract benefits may vary.

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Exhibit 10: Oakland Has the Second Highest Minimum Monthly Service Rate of Local Jurisdictions Served by the Same Hauler, Transfer Station, and Landfill



Source: Auditor analysis of single-family 2024-2025 Waste Management rates for minimum service (3 streams with 20 gallons trash) in Oakland and other local cities served by Waste Management: Albany, Hayward, Oro Loma, and Emeryville. Additional hauling services included in contracts vary.

Oakland residents also pay more for similar curbside waste services than residents of San Jose and San Francisco (see Exhibit 11 below). Multi-family rates are also higher in Oakland. For example, two cubic yards of trash service for multi-family residences costs \$658.04. This is more than the cost for two cubic yards of trash bundled with recycling for multi-family residences in both San Francisco and San Jose, where it costs \$523.98 and \$236.22, respectively. All benchmark jurisdictions also receive at a minimum, one to two free bulky pickup appointments annually, although other contracted services may vary.

Exhibit 11: Oakland Residents Pay Significantly Higher Curbside Hauling Rates Than Those of Other Bay Area Residents



Source: Auditor analysis of curbside waste hauling rates for Oakland’s Waste Management, San Jose’s Republic Services, and San Francisco’s Recology. Additional hauling services included in contracts vary. *Note: San Francisco’s hauling rates were set to reduced prices as part of a \$95 million overbilling settlement with Recology.

According to Public Works staff, the higher prices may be attributable to Oakland's investment in the organic materials recycling facility (OMRF), or other services that the City receives relative to neighboring jurisdictions. According to Waste Management, the OMRF was installed to meet City diversion goals in line with the Zero Waste Strategic Plan²⁵ and SB 1383.²⁶ Public Works staff noted that Waste Management has not provided a cost breakdown on how OMRF costs affect Oakland curbside waste rates.

The City's contract with Waste Management will be up for renewal in 2030. As described above, areas without affordable and convenient waste pickup service tend to experience a higher incidence of household and yard waste dumping and illegal dumping can be prevented by making proper and affordable waste and recycling management available to as many residents and businesses as possible. While we cannot prove direct cause and effect between the City's hauling rates and the rates of illegal dumping, the City should pursue reduced hauling rates by renegotiating the current hauling contract or pursuing a competitive selection process (e.g., Request for Proposals (RFP)) from alternate haulers. As suggested by best practices, if Oakland curbside waste hauling rates are more affordable, the flow of illegal dumping to the streets should slow.

Recommendation 1: To ensure Oakland residents have affordable access to legal waste disposal methods, Public Works and the City Attorney's Office should renegotiate the contract with its contracted hauler or assess options for other haulers through a competitive selection process at the next renewal date, to reduce hauling rates per volume and promote transparency by detailing cost components of the rates to allow adjustments to City services.

Landlords are Responsible for Ensuring Sufficient Garbage Service and Low-Income Renters Do Not Qualify for Reduced Rates

In Oakland, only low-income senior homeowners and homeowners with qualifying disabilities are eligible to receive a 12.5-percent discount for service. Renters are not currently eligible to receive discounted service. Renters and homeowners may also differ in their ability to request larger bins from Waste Management. According to Oakland Municipal Code Section 8.28:

Every person in possession, charge, or control of any single-family dwelling, multi-family dwelling or commercial premises shall provide a sufficient number of such containers of sufficient capacity to hold all mixed materials, recyclable materials, and organic materials which are created, produced, or accumulated on such premises between the time of successive collections by the collector or removal under self-haul permit.

At a minimum, property owners must subscribe to waste service of at least 20 gallons each of three-stream (trash, compost, and recycling) service per residence or business for single-family and commercial properties. Multi-family units must receive at minimum 20 gallons of trash

²⁵ <https://www.oaklandca.gov/files/assets/city/v/1/public-works/documents/sustainability/zero-waste-history/zero-waste-strategic-plan.pdf>

²⁶ <https://calrecycle.ca.gov/organics/slcp/>

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service and compost and recycling “sufficient for the amount of those materials generated.” Property owners are also responsible for property removed from a unit after tenants leave, either through move-out or eviction, per Oakland Municipal Code 8.11.550. The property owner must coordinate with the tenant or remove the property.

Landlords and property owners determine volumes of curbside garbage service for renters and set rent prices considering those costs. As businesses, landlords are generally incentivized to keep costs low or increase rent costs as necessary to cover the costs of curbside waste service. Low-income renters that need higher volumes of waste service may be disincentivized to request additional service if that will increase rent cost.

The City should assess options for reduced-cost service to low-income renters as well as low-income homeowners, such as the approval of curbside waste hauling subsidies from alternative, non-rate based funds. Increased access to legal waste disposal for residents should reduce illegal dumping, as described in the 2025 EPA Illegal Dumping Guide.

Recommendation 2: Public Works, in collaboration with the City’s contracted hauler, should assess options to provide reduced-cost service to low-income residents, including renters, to encourage service volume increases where needed without increasing the rent burden.

Beyond Regular Curbside Service, Bulk Waste Disposal Could Be More Convenient and Affordable

Residents who need to dispose of large items, such as furniture, have two options: 1) taking items to a local landfill or transfer station, or 2) arranging a bulky pickup appointment through Waste Management or another service provider.

Previously, the City offered ‘bulky block parties’ as a service where residents could bring bulky, non-hazardous waste such as furniture to a temporary location within the city, for free, with proof of residence. This service provided an option for residents to get rid of waste either in addition to, or in favor of, their annual bulky appointment pick-up by Waste Management or a trip to the transfer station or landfill. Reportedly, these events were very popular among residents, with long lines forming, sometimes persisting for hours. The program held its final event on June 22, 2024, and there are no current initiatives to bring back the events due to budget constraints. Public Works leadership noted that bulky block parties are in addition to bulky pickup services already covered under the contract with Waste Management (see Background) and may be an unnecessary cost and duplication of service by the City.

Self-hauled waste can be dumped legally for a fee at Altamont Landfill in Livermore or the Davis Street Transfer Station in San Leandro (see Exhibit 12 below). The Altamont Landfill and Davis Street Transfer Station are 42 and 11 miles away from downtown Oakland, respectively.

Exhibit 12: Oaklanders Have to Drive to San Leandro or Altamont to Legally Self Haul Waste



Source: Auditor produced map. The black line represents Oakland city boundaries.

Prices vary at the two sites (see Exhibit 13 below). Davis Street Transfer Station is much closer to Oakland and offers deals on smaller loads and mattresses, but the mixed waste cost is higher for larger loads.

Exhibit 13: Large Loads of Mixed Waste Cost More to Dump at Davis Street Transfer Station Compared to Altamont Landfill, though Some Smaller Loads Cost Less

	Mixed Waste (large loads) per ton	Mixed Waste (small loads) Per cubic yard	Appliances each	Mattresses each	Mixed C&D Waste (large loads) Per ton	Mixed C&D Waste (small loads) Per cubic yard
Davis Street Transfer Station	\$303.00	\$78.00	\$132.00	Free for 1-5	\$303.00	\$61.00
Altamont Landfill	\$131.28	no small load rate	\$337.14	\$168.31	\$121.18	no small load rate

Source: Auditor analysis of rates as of January 2026. C&D refers to Construction and Demolition.

According to Waste Management’s hauling contract, all residential units are able to schedule one no-cost bulky self-haul drop-off to the Davis Street Transfer Station annually. In 2025, a total of 4,501 residential drop-offs were made. Over 80 percent of these drop-offs were made by single-family residents and may suggest a lack of accessibility or awareness among multi-family residents. On Oakland’s public rights-of-way, mattresses are a frequently dumped item despite

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Davis Street Transfer Station offering free drop-off for up to five mattresses, which could indicate a lack of awareness or accessibility, such as the inability to transport mattresses.

The City Offers Free Bulky Pickup Appointments, But They Appear to Be Underused by Multi-Family Residential Units

Oakland residents receive at least one free annual bulky pickup of up to:

- 4 cubic yards of non-recyclable waste,
- 1 large appliance,
- electronic devices,
- 2 tires,
- 2 mattresses or box springs,
- 2 carpets,
- scrap metal, cardboard, and/or untreated wood.

Exhibit 14: The City and Waste Management Share Information on Free Bulky Pickup via Mailers

Have You Taken Advantage of Your Bulky Junk Services?
Curbside and Drop Off Appointments Available to All Oakland Renters.

Schedule your bulky services:

1. Annual bulky junk drop off
2. Annual curbside bulk pick up

Residents can schedule bulky service directly with WM and do not need landlord approval..

Call 1-888-WM-Bulky or visit OaklandRecycles.com/Bulky

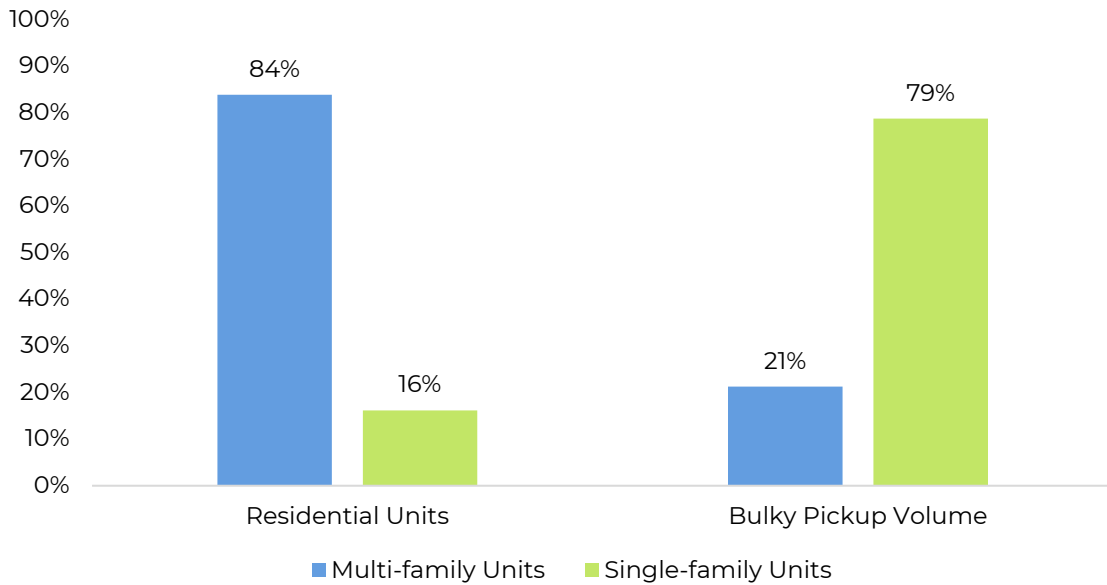
Look for more information: Recycle, compost, trash, & hazardous waste sorting guides and services

Source: Oakland Recycles Mailer from 2024.

Free bulky pickup appointments appear to be underused by multi-family residential accounts. While multi-family units made up 84 percent of residential units served by Waste Management in Oakland in 2025, only 21 percent of the volume of bulky waste picked up through free bulky pickup appointments came from multi-family units, as shown in Exhibit 15. On average, multi-family units used an estimated 0.05 cubic yards of bulky pickup for every 1 cubic yard of bulky pickup that single-family units used in 2025.

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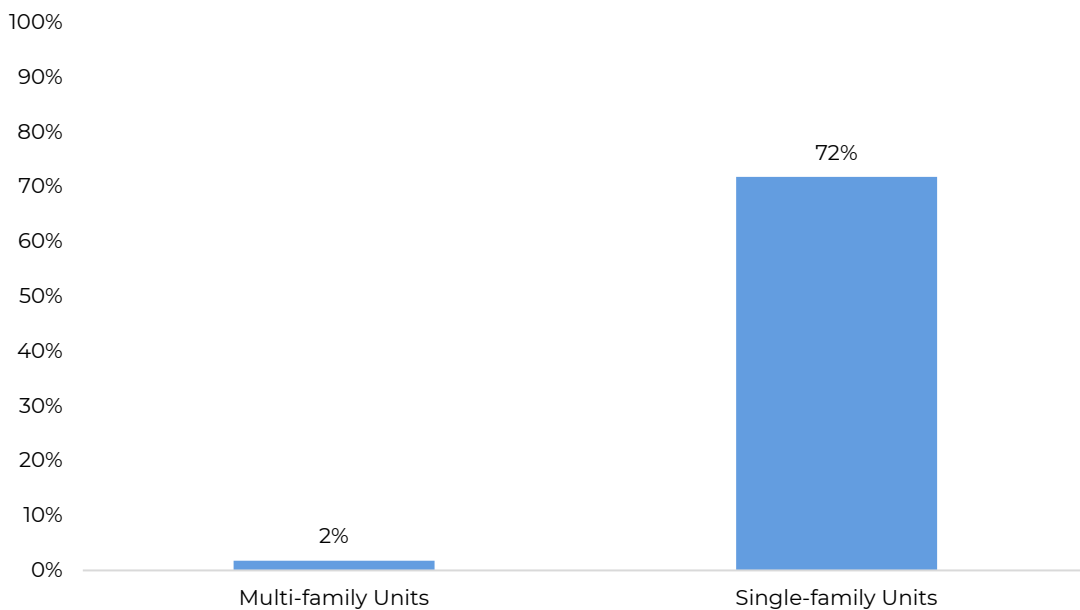
Exhibit 15: Bulky Pickups for Multi-family Residential Accounts Made Up Just 21 Percent of Pickup Volume, Despite Being 84 Percent of Service Accounts in 2025



Source: Auditor analysis of 2025 Waste Management data.

The use ratio is more stark by appointments. In 2025, an estimated 72 percent of single-family units used their bulky pickup appointment, while less than 2 percent of multi-family units used theirs (see Exhibit 16 below).

Exhibit 16: In 2024 and 2025, an Estimated 72 Percent of Single-Family Units Used Their Bulky Pickup Appointment, While Less than 2 Percent of Multi-Family Units Used Theirs



Source: Auditor analysis of 2025 Waste Management data. Note: This estimate may not reflect exact proportions as some single-family units may have scheduled multiple bulky pickup appointments while others scheduled none.

Both Public Works and Waste Management field staff attest to larger volumes of residential waste dumped near larger multi-family residential complexes. In combination with the low use of free bulky pickup appointments, this suggests a potential lack of awareness or accessibility to bulky waste pickup for residents of multi-family housing. This may also suggest a lack of property owner awareness of their responsibilities under the Municipal Code.

Restrictions make scheduling a bulky pickup appointment more difficult for residents of multi-family buildings. For example, Waste Management is contractually required to provide bulky appointments within two weeks to single-family units and within a month for multi-family units, making appointments less convenient to multi-family residents. Single-family units also can schedule a second free bulky pickup appointment under certain conditions, while multi-family units cannot.

According to the EPA's 2025 Illegal Dumping Guide, accessible, informative, and broad education and outreach in combination with accessible waste services are foundational to prevent and manage illegal dumping. Increased education and outreach on bulky pickup services available should increase the use of this service and decrease illegal dumping, especially due to moving and evictions. Environmental Enforcement Officers (EEOs) are intended to perform education and outreach as part of their responsibilities, but outreach opportunities are limited according to EEOs and Public Works management (see Finding 3). To increase the use of existing services, including bulky pickup, Public Works should increase its outreach and education efforts.

Recommendation 3: Public Works should increase outreach and education on bulky pickup appointments, and improve ease of use, especially for multi-family buildings, to increase use of free bulky pickups to residents and decrease the amount of bulky material dumped on public property or hauled illegally.

Mayoral and City Council Allotted Bins Were Underutilized and Could be Reallocated

Through the City's hauling contract with Waste Management, the Mayor and each City Councilmember are allotted twelve 20-cubic-yard dumpsters each (108 total) and 30 for general City events annually, with a maximum of 24 unused dumpsters carried over per allotment to the next year. In 2023, 87 dumpsters (1,740 cubic yards) were unused and carried over to 2024. In 2024, 79 dumpsters (1,580 cubic yards), including some of those carried over from 2023, were unused and carried over to 2025. At the end of 2025, 71 dumpsters (1,420 cubic yards) were unused, including 22 of the 30 allotted bins for City events. This represents a loss in contract value that could be reallocated to maximize benefit to residents.

The City has unused dumpsters that could support volunteer pickups. In 2025, the City picked up over 2,000 requests by Adopt-a-Spot volunteers, many of which could have been diverted to unused Waste Management dumpsters included in contract rates. City staff explained that volunteer clean ups in upkeep of public spaces through Adopt-a-Spot are limited by supplies, equipment, and staffing by the City. While Adopt-a-Spot volunteer bags should be picked up within three business days, staff point to possible issues deploying sufficient staff as demand grows. We observed late pickups after City-organized community clean ups, and EEOs noted

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waste bags filled by resident volunteers left over from Martin Luther King Jr. Day were picked up over a week after the event. The Urban Compassion Project, a local nonprofit that organized volunteer illegal dumping clean ups, used social media to request additional support from the City and described the bag system as “inefficient and time-consuming” compared to dumpsters.²⁷ Unused mayoral and Councilmember dumpsters could be reallocated to community groups via Adopt-a-Spot or Public Works for neighborhood clean ups or bulky block parties.

Recommendation 4: Public Works should ensure contract benefits are maximized, including the full use of allocated bins by the offices of the City Councilmembers and the Mayor, or divert unused bin allotments to benefit residents, such as through grants to, or partnerships with, community organizations or programs like Adopt-a-Spot, or City-sponsored bulky block parties.

²⁷ Instagram post: <https://www.instagram.com/reel/DPLBjLcivuB/?igsh=NTc4MTIwNjQ2YQ==>
website: <https://urbancompassionproject.org/>

Finding 2: The City Could Strengthen its Enforcement of Illegal Dumping Through Legislative Changes and Improved Regional Collaboration

Summary

The City can strengthen its legal enforcement of required waste services and illegal dumping. Currently, the City only imposes special assessments on residential properties not subscribing to waste services, though it could impose special assessments on both residential and commercial properties. Additionally, Oakland's fine structure for illegal dumping violations is lower than the fine structures of other local jurisdictions and could be raised to deter illegal dumping. At the time of this report, the Oakland City Council is set to consider higher penalties in line with those recommended by Alameda County's Draft Ordinance.²⁸ To strengthen legal enforcement of illegal dumping, the City should: extend special assessments for lapsed waste services to include commercial properties, consider increasing the illegal dumping fine structure to match that proposed by Alameda County, and assess opportunities, budget, and staffing for collaboration with County departments.

Commercial Hauling Enforcement is Weaker than Residential Hauling Enforcement

As described in the Background, according to O.M.C. 8.28.142, all commercial businesses except those meeting self-haul or waiver requirements must be subscribed to collection services for compost, recycling, and trash. The City and Waste Management, respectively, estimate that between 2,500 and 6,800 businesses in Oakland were not signed up for mandatory garbage service as of late 2023 to early 2024. Businesses not signed up for service may illegally dump waste themselves and/or hire unlicensed haulers who illegally dump waste. In general, businesses without appropriate garbage service pose an increased risk of illegal dumping in the city.

According to O.M.C. 8.28.180, the City can impose a special assessment on properties and subscribe to waste service on the property owner's behalf for any nuisance property not subscribed to waste collection.²⁹ Currently, only residential properties (multi-family and single-

²⁸Alameda County drafted an Illegal Dumping Ordinance in 2025 (see https://www.acgov.org/board/bos_calendar/documents/DocsAgendaReg_10_22_25/GENERAL%20ADMINISTRATION/Regular%20Calendar/Item_2_Illegal_dumping_ord.pdf). During the course of this audit, the Public Works and Transportation Committee approved to send to City Council on April 14, 2026, Councilmember Unger and Mayor Barbara Lee's recommendation to "Adopt An Ordinance Amending Oakland Municipal Code Chapter 8.11 (Illegal Dumping) To: (1) Increase Penalties For Illegal Dumping; (2) Make Transporting Waste In A Vehicle Without A License Plate An Offense; And (3) Increase Enforcement Against Illegal Dumping" ([file number 26-0527](#)).

²⁹ In California, a **special assessment against a nuisance property** is a mechanism authorized by state law (primarily Government Code §§ 38773.5 and 25845) allowing cities and counties to recover the costs of abating (fixing or removing) a public nuisance directly from the property owner. If the owner fails to pay for the abatement, the costs are assessed against the parcel and collected in the same manner as ordinary municipal taxes.

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family buildings) are subject to special assessment if they lack required waste services. Public Works staff report that putting commercial accounts on special assessment is difficult due to differences in the ease of tracking property owners and occupants of multi-family housing and commercial properties, where the billing address differs from the physical address. To enforce commercial waste requirements, Waste Management provides a list of businesses with lapsed service to the EEU to investigate and follow up with (as discussed further in Finding 3). The EEU collaborates with Waste Management to identify businesses that lack service to require them to subscribe to trash service. City staff report that commercial special assessments should be possible and the Mayor announced a proposal during the course of this audit to establish commercial special assessments.³⁰

Recommendation 5: To streamline enforcement of lapses in commercial curbside waste hauling service, the City Administrator, in coordination with the Finance Department and Public Works, should institute special assessments on commercial properties without service, similarly to how it does on residential properties, and/or revise the contract to authorize the City's contracted hauler to notice commercial properties, with the City issuing penalties as required.

Oakland's Illegal Dumping Fines are Lower than Those in Other Local Jurisdictions

As described in the Background, Oakland Municipal Code Chapter (O.M.C.) 8.11 separates fines for illegal dumping into two categories:

- **Administrative citations** are for “instances of illegal dumping where the amount of waste matter is reasonably believed not to be a commercial quantity or to contain harmful waste matter.” Oakland Municipal Code 1.12 defines this fine structure as starting at \$100 for the first instance, \$250 for the second, and \$500 for all subsequent issuances within a calendar year. Oakland Municipal Code 8.11 further states that “if the City issues more than three administrative citations issued to one person within a three-year period of the first citation, each such citation in excess of three is considered a major violation and shall be assessed as a civil penalty pursuant to O.M.C. Chapter 1.08.”
- **Civil penalties** are for instances of illegal dumping considered “major violations.” This includes instances that are commercial in quantity or contain: hazardous materials, mattresses, furniture, appliances, electronic waste, or the dumper has committed more than three acts of illegal dumping in the past three years. According to Oakland Municipal Code 1.08, these violations can be assessed at up to \$1,000 per day (if not abated) and no more than \$365,000 cumulatively per calendar year for an individual parcel or structure. Staff at the City Attorney's Office explained that although civil penalties accrue daily, the total amount the City collects per reported violation is generally limited because the City

³⁰ On October 21, 2025, Mayor Barbara Lee's Office announced a forthcoming proposal to City Council to implement a commercial special assessment: <https://www.mayorbarbaralee.com/release/mayor-lee-announced-expanded-weekend-illegal-dumping-response-to-keep-oakland-streets-cleaner>.

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aims to clean up reported dumps within 3 business days. Exceptions include special clean ups that take longer to abate, such as hazardous materials.

Exhibit 17 below compares Oakland’s illegal dumping fines for Administrative Citations and Civil Penalties to those of other local jurisdictions, many of which are higher than Oakland’s.

Exhibit 17: Oakland’s Illegal Dumping Fines Compared to those of Other Local Jurisdictions

Administrative Citations (Non-Criminal Violations)						
Offense	Oakland	San Francisco	San Jose	Fremont	Santa Cruz	Alameda County (Proposed)
1st	\$100	\$100	\$2,500	\$100-\$1,000	\$2,500	\$2,500
2nd	\$250	\$200	\$5,000	\$200-\$1,500	\$5,000	\$5,000
3rd +	\$500	\$500	\$10,000	\$500-\$3,000	\$10,000	\$10,000
Civil Penalties: (Major Violations, Commercial Quantities, Criminal Violations)						
Offense	Oakland	San Francisco	San Jose	Fremont	Santa Cruz	Alameda County (Proposed)*
1st			\$2,500	\$1,000- \$3,000	\$2,500	\$3,250
2nd	\$1,000/day max	\$1,000/day max	\$5,000	\$3,000-\$6,000	\$5,000	\$6,500
3rd +			\$10,000	\$6,000-\$10,000	\$10,000	\$12,500

Source: Auditor table comparing fine structures of other local jurisdictions (San Francisco Ordinance 73-08, San Jose Ordinance 9.10.545, Fremont Municipal Code 1.20.080, CA Penal Code 374.3, Santa Cruz Municipal Code 7.20.220, Alameda County Proposed Ordinance 2025). San Jose, Santa Cruz, and Alameda County (Proposed) do not differentiate fine structures between commercial and non-commercial dumping. *Alameda County’s proposed ordinance cites civil penalties in addition to administrative citations. We added the two proposed Alameda County fines for major violations together to demonstrate the citation cost for major violations. The proposed ordinance also includes an option to fine for failure to abate in addition to the penalties listed in this table.

San Francisco and Fremont have similar fine structures to Oakland, although Fremont pursues higher fines for commercial quantities. San Jose and Santa Cruz County pursue higher fines for administrative violations than the City of Oakland does. San Jose and Santa Cruz County both pursue higher fines for administrative citations than Oakland does for more serious violations. A

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proposed ordinance for Unincorporated Alameda County would increase Alameda County's fine structure to be greater than Oakland's for administrative citations and civil penalties. Different kinds of illegal dumping, including illegal hauling and environmental crimes, can increase the severity of the punishment. As described in Finding 3, the City can improve its environmental enforcement. Regardless, the City should consider increasing penalties to match those proposed by Alameda County to ensure illegal dumping enforcement is consistent regionally.

Recommendation 6: The City of Oakland should consider increasing fines for illegal dumping to match those proposed by Alameda County, to promote consistent enforcement regionally.

Illegal Hauling is a Regional Issue

Oakland Municipal Code 8.28.060 and 8.28.070 state that only the designated hauler, or those authorized by law, may collect or haul waste, recyclables, organic materials, or bulky materials within the city. As described above, exceptions include residents hauling waste to the transfer station or landfill in addition to their curbside hauling service, residents or businesses with self-haul permits in lieu of curbside hauling service, landscapers, certain waste handlers, City crews, and others meeting specific regulatory conditions. Residents and business owners can elect to self haul waste to approved transfer or disposal facilities with a self-haul permit, but these permits are rarely approved, per City staff.

Alameda County staff report that about 90 percent of dumping events cited were from within a mile radius of the dumping site, with the remaining 10 percent of dumping events originating from outside of Oakland. These incidents were also the largest by weight in 2022, suggesting illegal haulers were responsible for the largest dumping events within Oakland. Alameda County reports it is lobbying the state to set up a permit system for haulers. County staff are hoping to follow Contra Costa County in implementing a new, non-franchise solid waste collection and transport permit system, requiring all non-franchised haulers to have a current permit to collect waste in unincorporated Alameda County. Oakland Public Works leadership noted that while they support increased permitting of haulers, the right of any resident to haul their own excess waste to the Davis Street Transfer Station or Altamont Landfill without a permit makes enforcing hauling permits difficult.

Exhibit 18: Illegal Haulers Leave Bay Area Residents' Trash and Personal Information on Oakland Streets



Source: Auditor photo of suspected illegal hauler dump, taken January 28, 2025. EOs noted evidence of an illegal hauling pile, including evidence of waste brought from other local cities and multiple individuals' identifying information in the rubbish.

Both the Alameda County Sheriff's Office and the Oakland Police Department (OPD) have the authority to issue citations for illegal hauling and dumping. The Alameda County Sheriff's Office reported just three illegal dumping offenses from 2019 through 2025 in Alameda County, one of which was in Oakland. OPD has the authority to cite for violations of hauling permitting and illegal dumping but is limited by time constraints and competing priorities. Criminal enforcement notably requires a higher standard of evidence and an OPD officer needs probable cause to stop a vehicle, and according to OPD, simply hauling trash does not meet that threshold. OPD's General Crimes Unit gathers evidence on reports of illegal dumping believed to be sufficient to present to the District Attorney. The level of evidence, including surveillance video and statements of admission, determine whether OPD pursues a misdemeanor citation in collaboration with the

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District Attorney.³¹ According to the Alameda County District Attorney's Office, six cases were referred or forwarded to the District Attorney's Office from January 1, 2024 to December 31, 2025.³² Limited enforcement may motivate illegal dumping if illegal haulers believe they can avoid prosecution.

Exhibit 19: Illegal Haulers Dump Waste in West Oakland on a Thursday Morning



Source: Auditor photo taken March 6, 2025. We observed illegal haulers dumping in West Oakland on March 6, 2025. We reported this event to the Environmental Enforcement Unit and Oakland Police Department (See Finding 3).

Renewed Collaboration Efforts Could Help Bolster Illegal Dumping Enforcement Regionwide

According to the 1998 EPA Guidebook, local authorities should work together and with local communities to avoid duplication of efforts. The City and County piloted a collaborative illegal dumping approach in 2019, developing the “Three 3 E’s” of Illegal Dumping: Education, Eradication, and Enforcement in collaboration with Alameda County elected officials, including the District Attorney's Office, businesses, including Waste Management, and local organizations.

³¹ Finding 3 discusses the effectiveness of EEU referrals to OPD and the City's camera strategy.

³² The Alameda County District Attorney's Office reported that six illegal dumping cases were referred to them and four of those cases have been officially closed. The number of cases referred are not exclusive to cases referred by the City of Oakland.

Illegal dumping cases were sent to the District Attorney's Office to charge as a misdemeanor. Alameda County staff report that the prosecution process was time consuming and created a bottleneck. To speed up the process, Alameda County diverted illegal dumping cases to the Alameda County traffic court.

While the City refers cases to the Alameda County District Attorney for prosecution, district attorneys have differently prioritized prosecution of illegal dumping.³³ More consistent collaboration, such as regular regional strategy meetings and coordination with the Alameda County Sheriff's Office and District Attorney's Office, could reduce existing gaps in enforcement that illegal haulers can exploit.

Recommendation 7: In coordination with the Public Works Department and the Police Department, the City Administrator's Office and the City Attorney's Office should assess opportunities, budget, and staffing for collaboration with County departments, such as regular regional illegal dumping strategy meetings and coordination with the Alameda County Sheriff's Office and District Attorney's Office, to bolster enforcement of illegal dumping in Oakland and increase consistency in enforcement regionally.

³³The City Attorney's Office will refer criminal cases to the District Attorney's Office for prosecution. For infractions the City relies on Public Works and Code Enforcement for administrative enforcement. According to City and County staff, former Alameda County District Attorney Pamela Price did not prosecute illegal dumping. The current Alameda County District Attorney is open to prosecuting illegal dumping. Under state law, the City Attorney could prosecute misdemeanor violations of the Oakland Municipal Code with the approval of the District Attorney, according to California Government Code 41803.5.

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Finding 3: While the City’s Illegal Dumping Clean Up Appears to Have Been Effective and Timely, 311 Reporting Should Be More Accessible, and Enforcement Needs Clear Strategies, Procedures, Interdepartmental Coordination, and Performance Management

Summary

While the City has an efficient illegal dumping clean up program, environmental enforcement could be improved through finalized strategies, clear goals and procedures, regular review of enforcement and prevention strategies, consistent staffing and workload improvements, streamlined processes and interdepartmental coordination, and through improved user access and updates via SeeClickFix, the City’s online 311 portal.

According to the 1998 EPA Illegal Dumping Guidebook, effective illegal dumping prevention requires an integrated approach, including site maintenance and controls, community outreach and involvement, targeted enforcement, and program measurement. The City can improve its service delivery through coordinated community outreach and collaboration between departments, including Public Works, Finance, Code Enforcement, and OPD. An integrated approach supports efficient and effective illegal dumping enforcement and prevention.

CalRecycle’s Illegal Dumping Toolbox states that effective enforcement requires “sufficient staff resources, trained enforcement officials, clear lines of authority, timely prosecution, and support from the judicial system.” In reviewing the City’s illegal dumping enforcement efforts, we identified weaknesses in the Environmental Enforcement Unit’s (EEU’s) internal controls, or mechanisms that help ensure an organization meets its goals, including low staff resources, lack of training, unclear authorities, and gaps in processes for prosecution. The EEU’s work plan and program goals are still in draft form, indicating that the Unit does not yet have written policies or procedures to guide staff. Environmental Enforcement Officers (EEOs) should receive additional training to help them more accurately and effectively cite major violations, such as dumping hazardous materials and dumping near waterways. Our review identified issues with employee direction and supervision stemming from the lack of written goals and policies and procedures. We also found that performance data was not regularly used by management, and that the development and evaluation of enforcement strategies – such as for enforcement camera deployment – would promote program effectiveness.

As possible, the City should also make online 311 reporting available in languages other than English, to increase community involvement and to promote equal access to City services and increase accessibility of 311 to residents who speak languages other than English.

Exhibit 20: Illegally Dumped Waste Piled on Top of a Storm Drain



Source: Auditor photos taken on February 12, 2026 and January 27, 2025, respectively.

The Environmental Enforcement Unit Lacks Internal Organization

CalRecycle's Illegal Dumping Toolbox states that effective enforcement requires "sufficient staff resources, trained enforcement officials, clear lines of authority, timely prosecution, and support from the judicial system." In addition to low staffing, mentioned later in this Finding, we identified insufficient training and internal controls.

Best practices consider an internal controls system strong if:

- management and staff have policies and procedures to operationalize practices towards meeting organizational goals
- employees are properly trained and competent to perform their assigned duties
- employees are properly supervised
- an effective feedback or monitoring system is in place to ensure compliance with written procedures.

Internal control systems are considered weak if:

- management or staff demonstrate an uncooperative or uncaring attitude concerning compliance, recordkeeping, external review
- have not developed organizational goals
- documentation of procedures are lacking, outdated, or nonexistent
- employees do not receive training or have inadequate or minimal competencies for their assigned roles

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- supervision is inadequate or nonexistent
- feedback or monitoring systems are minimal or nonexistent.³⁴

Public Works' EEU is comprised of EEOs whose responsibilities include explaining and enforcing regulations pertaining to illegal dumping, recycling, and nuisance control. We found the EEU is not as effective as it could be with appropriate organization, documentation, and oversight. Specifically:

- There are no active, written policies and procedures for staff; the EEU work plan is currently in draft form.
- Staff interviews indicated conflicting understanding of roles and responsibilities between levels of staff.
- EEOs need additional training on hazardous waste identification and other cases that can lead to higher fines.³⁵
- While Public Works has performance data, supervisors report that performance management data is of limited use, and other types of analysis, such as which strategies improve the effectiveness of citations, would be more useful.

In recent years, the EEU has undergone leadership change and departmental reorganization, as the unit was moved from Keep Oakland Clean and Beautiful (KOCB) to Environmental Services, possibly contributing to workflow issues. Also contributing to the disconnect, the field staff lack a field supervisor with experience in the field or shared workspace. Public Works staff could be more effective with clearer expectations.

Recommendation 8: The Environmental Enforcement Unit should finalize its strategy, goals, policies and procedures, and training documents. The Unit should align strategy, goals, policies and procedures to support staff management.

Recommendation 9: The Environmental Enforcement Unit should ensure all field staff receive adequate training on enforceable offenses related to illegal dumping, including major violations such as dumping hazardous material and illegally hauling waste, to ensure environmental crimes are being enforced appropriately.

³⁴ For organizational best practices for internal controls, refer to "Standards for Internal Control in the Federal Government" (May 2025) published by the US Government Accountability Office: <https://www.gao.gov/assets/gao-25-107721.pdf>

³⁵ We observed instances in the field when EEOs did not identify hazardous waste (i.e., flammable refrigerants or hazards posed by waste dumped over storm drains).

From Late 2024 to Mid-2025, City Staff Were Directed to Proactively Patrol Just One Part of the City, Leading to Uneven Enforcement

The lack of written procedures and expectations also has effects on staff expectations and consistent service delivery. For example, patrol plans and assignments are not formalized and the department’s strategy, goals, and outcomes of various efforts were unclear. We found from late 2024 to the end of March 2025, EEOs patrolled only in Deep East Oakland, between 80th and 100th Avenues.³⁶ The strategy appears to have been in response to commitments between City leadership and a local organization that is negatively affected by illegal dumping.

Exhibit 21: Environmental Enforcement Officer Investigates Illegally Dumped Waste Near International Boulevard



Source: Auditor photo taken on January 27, 2025.

The strategy’s narrow focus on a 20-block stretch was “never meant to be long term,” according to staff, and was anticipated to expand out along International Boulevard over time. Management reported that the efforts along International were expanded citywide and that these efforts are not synonymous with patrols, but there was no formal documentation to reflect any goals, changes, or results of these efforts.

³⁶ Staff testimonies of the efforts on International Boulevard were unclear as to the timeline and reasoning behind the strategy and conflicted with one another.

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Between late 2024 and the end of March 2025, EEOs received daily emailed assignments to patrol a specified stretch of blocks along International. As a result, other Oakland neighborhoods only received EEO enforcement in response to urgent 311 reports labeled as enforceable, which are rare according to EEU management. EEOs report that they were given little information on the reasoning behind this assignment, but expressed concern about other districts feeling neglected. Additionally, because EEOs report illegally dumped piles to clean up crews when patrolling proactively, reduced EEO coverage citywide may have resulted in slower clean ups in unpatrolled areas. In industrial or less-trafficked corridors of the city, like some in West Oakland, service requests by field staff may be among the only ways the City becomes aware of dumped trash. Public Works management and staff accounts of when this strategy began and ended were inconsistent, with leadership being unaware of strategy changes in some cases.

Public Works leadership responded that they believed EEOs were never given direction to end that assignment, and it was not brought to their attention that the assignment was ongoing, nor that it was impeding broader patrols across the city. While they agreed that this communication error indicated a need to improve internal work protocols as proposed in Recommendation 8, they state that this assignment is not representative of the broader direction the unit has received in the past seven years.

Evidence gathered by EEOs is High Quality, but Difficult to Obtain

The City Attorney's Office has helped to develop guidance for EEOs to improve the quality of evidence collected and improve the City's effectiveness in administrative hearings. The City Attorney's Office reports that the quality of evidence collected by EEOs is generally high, but without eyewitnesses or surveillance footage, it is difficult to establish to a court or jury of a violation beyond a reasonable doubt in a criminal trial, or preponderance of the evidence in an administrative hearing.³⁷ By contrast, when illegal dumping is caught on camera, it provides stronger evidence.³⁸

Environmental Enforcement Citations Do Not Appear to be Cost-Effective

Illegal dumping citations with low monetary penalties do not appear to effectively deter illegal dumping and citations do not appear to be cost-effective. The cost-benefit of the program could be improved by clearer policies, procedures, roles, and responsibilities, improved trainings, and better use of performance data, as mentioned above, as well as higher fines as described in Finding 2.

As described in the Background, EEOs collect evidence of illegal dumping in the field and cite offenders. The EEU then sends citations to Finance Department staff who handle the collection of fines. In FY 2024-25, expenses to support the EEU totaled over \$2 million.

³⁷ According to City Attorney's Office staff, administrative hearings require 'preponderance of the evidence' while criminal cases required evidence beyond a reasonable doubt.

³⁸ Most cases are not eligible for criminal enforcement, which generally requires photo or video evidence of the illegal dumper in action.

While citation payments from the program are not intended to fully recover costs, paid citations resulted in just over \$16,000 in revenue in FY 2024-25. Many citations went unpaid or received no response.³⁹ People who have been cited may choose community service in lieu of paying the fine; however, only an estimated 18 percent of citations requested community service in 2024 while an estimated 73 percent of citations received no response.⁴⁰ For citations that undergo appeals, staff noted that the cost of an independent hearing officer often exceeds the cost of the citation. While citations that do not receive a response or payment are referred to the Collections unit in the Finance Department, ineffective transfer of citation information between the departments has resulted in potential lost revenues.

Public Works Can Improve Timeliness and Completeness of Information Submitted to the Finance Department for Collections

Collaboration between departments is necessary for efficient and effective illegal dumping enforcement. Lack of effective collaboration and communication between City departments results in ineffective follow-up on citations.

Slow or lost information and documentation transfer between departments affects the ability of the City to pursue legal action for payment. Finance Department staff reported that they received citation accounts eligible for collection from Public Works in December 2021 that had problems, such as names on invoices not matching citation names. When reissued in August 2024, the identified problems had not been modified, resulting in an inability to file these before the statute of limitations expired, according to Collections staff.

In this case, over \$4,000 in collectable citations was lost. Collections staff reported they have not received another batch of citations for collections since. Collections staff are discussing the next round of unexpired citations, from August 2022 or later, with Public Works staff. Citations from calendar years 2020 and 2021 were not collectable due to the statute of limitations. As of January 2026, collections staff noted that this collaboration issue is ongoing. Collections staff reported that they are collaborating with Public Works to develop processes to mitigate delays, address documentation issues, and properly identify dumpers and are exploring the acquisition of software to optimize the entire process.

Recommendation 10: Public Works should develop a policy and procedure to ensure all citation documentation for collections is sent promptly to the Finance Department's Collections Unit and with complete documentation.

³⁹ On February 19, 2026, California State Senator Jesse Arreguín introduced SB 1218, a bill that would require the Department of Motor Vehicles to deny renewal of a vehicle's registration if the registered owner or lessee has been sent a notice of a delinquent illegal dumping violation—similar to the current policy for unpaid parking fines. If passed, this bill could increase the City's ability to collect fines from citations.

⁴⁰ This analysis is an estimate and does not include the potential cost savings of illegal dumping enforcement, including potential abatement by dumpers and reduced cost of labor and equipment for clean ups prevented by citations that deter dumping.

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Even With Photographic Evidence, the System Can Be Slow or Ineffective to Respond

During fieldwork for this audit, we observed an illegal hauler dumping on a West Oakland street in March 2025. We spoke to the dumper, collected video and photo evidence showing the action, including the dumper's face and a partial license plate of the vehicle used (see Exhibit 22). We immediately reported the incident to the Police Department and an EEO. In addition, we filed a police report. Initially, there was no request for the video or photo evidence despite us indicating that we had digital evidence to provide. In February 2026, OPD requested photos and witness statements for charging. This request occurred after we had followed up with OPD's General Crimes Unit for an update. While this case has not yet been resolved, staff from the City Attorney's Office and OPD indicated that follow-up on this case had "fallen through the cracks." This case is just one example of how regular collaboration and referral protocols between the EEU and General Crimes unit could help standardize illegal dumping enforcement. OPD staff have stated that illegal dumping investigations fall under Public Works' Environmental Enforcement Unit (EEU), that there is no system between OPD and Public Works to collaborate or 'trigger' OPD investigations of misdemeanors, and they have minimal capacity to patrol actively for illegal dumping.

Recommendation 11: The Environmental Enforcement Unit should introduce protocols for referral to the General Crimes Unit for criminal illegal dumping investigations, including criteria on the level of evidence required for misdemeanor citations.

Exhibit 22: Auditors Photographed Illegal Dumping in Action



Source: Auditor photo taken March 6, 2025. We observed illegal haulers dumping in West Oakland and reported this event to the Environmental Enforcement Unit and Oakland Police Department.

Strategic Citywide Coordination Between OPD, Code Enforcement, and Public Works would Support Holistic Clean ups and Enforcement

As described in the Background, different departments and divisions within the City address illegally dumped waste on public property, private property, and near encampments. According to the EPA's 2025 Illegal Dumping Guide, collaboration between local agencies can prevent redundancies and allow the sharing of resources. The City could better coordinate issues with both abatement and enforcement.

For example, in addition to the potential to improve enforcement as described above, on abatement, Code Enforcement management report that they do not collaborate with the Environmental Enforcement Unit beyond some Environmental Enforcement Officers (EEOs) calling in illegal dumping on private property on their behalf. According to the 2025 EPA Illegal

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Dumping Guide, a task force with representatives from relevant departments will help to address illegal dumping more effectively.

Improved collaboration between City departments could reduce redundancies, allow the sharing of resources, and ensure the appropriate departments follow up on illegal dumping incidents in a timely manner.

Recommendation 12: The City Administrator’s Office, in coordination with the Public Works Department, Police Department, Code Enforcement Services, and City Attorney’s Office, should develop a strategy for collaboration on illegal dumping remediation and enforcement, such as a task force with regular meetings and interdepartmental referral systems between City departments.

The City’s Camera Enforcement Strategy is Still Developing

In April 2024, the City Council approved the use of license plate readers (LPRs), under the illegal dumping use policy adopted by the Privacy Advisory Commission, and approved a contract with Security Lines for Public Works to enforce illegal dumping via license plate-reading surveillance cameras. Staff report that LPR cameras have allowed staff to capture footage of illegal dumping at night.

According to the Illegal Dumping Surveillance Camera Third Annual Report, from April 1, 2024 to March 31, 2025, Environmental Enforcement staff issued 134 citations from 159 recorded illegal dumping incidents.⁴¹ Most of these citations (72 of 134, or 54 percent of citations) stemmed from an illegal transfer station brought into compliance after several days of violations. During this reporting period, 14 camera “PODs,”—movable rigs containing four cameras at different angles—were upgraded to include LPRs, with additional LPRs already ordered for future installation.

We audited camera logs over five months, from November 2024 through March 2025. EEO monitoring of all 23 PODs installed at the time resulted in 10 citations. This indicates a low success rate of the camera strategy during that time.⁴² A few cameras were placed in locations that did not result in any illegal dumping events.⁴³ In some instances, footage was too dark to capture some dumping events, though this should improve with further implementation of license plate readers. Public Works leadership noted that cameras were relocated 32 times in 2025 in response to their effectiveness, but that they are not easy to move, requiring a bucket truck and staff time for installation. At the time of this audit, EEO surveillance cameras were placed at hotspots indicated by reports through 311 and SeeClickFix, the online reporting platform for 311. EEOs have noted that this placement could be more effective and noted there are hotspots they are

⁴¹ Inter Office Memorandum from Josh Rowan, Interim Director OPW, to the Privacy Advisory Commission, “*Illegal Dumping Surveillance Camera Third Annual Report*,” November 6, 2025.

⁴² The period reviewed, November 2024 to March 2025, comprises five months of those reported in the Illegal Dumping Surveillance Camera Third Annual Report. By contrast, EEO staff reported that working in the field, inspecting piles, could result in up to 15 citation reports per day, though with lower quality evidence.

⁴³ Staff report this could relate to potentially due to pressures to have cameras for each City Council district, regardless of illegal dumping frequency.

aware of that are not reflected in Public Works' report used to select camera placements. We observed several areas with recurrent dumping in the field with no cameras placed nearby, some of which could have filled multiple pickup truck loads of waste. Basing camera placement on 311 complaints also grants more surveillance in areas where people are more likely to report issues and leaves areas with less foot-traffic, like unused streets and areas with many vacant lots, less enforced. As noted in the Background, the EPA and CalRecycle both recognize that less visible and less maintained areas often attract illegal dumping. A feedback or monitoring system would help to support effective camera strategy.

Recommendation 13: Public Works should formally evaluate and review the effectiveness of fieldwork and camera-based citation strategies and adjust the strategies accordingly to increase the number and quality of citations per camera and decrease Environmental Enforcement Officer hours spent monitoring low-impact cameras.

The Environmental Enforcement Unit is Understaffed and Managing a Diverse Workload

As of February 2026, Public Works leadership reported that the EEU had seven unfrozen EEO positions authorized, five of which were filled.⁴⁴ The EEU had an active list of candidates and was scheduling interviews to fill the three anticipated vacancies.⁴⁵ While the EEU could improve its internal organization, the unit is managing a diverse workload with limited staff, reducing its ability to perform its intended functions successfully.

Public Works has taken some steps towards streamlining the unit's work:

- Public Works is assessing opportunities to improve collaboration with the Information Technology Department (ITD), including the use of aerial cameras to identify dumped piles and Artificial Intelligence (AI) in camera enforcement. The Environmental Enforcement Unit should assess the effectiveness of its citation strategies and adjust regularly.
- As mentioned in Finding 2, City staff have been working on proposals to impose special assessments on commercial properties with lapses in mandatory garbage service. This would streamline enforcement similarly to residential properties. Currently, EEOs' duties include following up with commercial properties to ensure businesses subscribe to sufficient waste services in addition to their patrol and camera monitoring responsibilities. EEOs receive a list of commercial properties with a lapse in service from Waste Management and investigate to determine whether the business moved, closed,

⁴⁴ One EEO is anticipated to transfer to a different division.

⁴⁵ Throughout this audit, there were other staffing issues, including management staff being lent out to other City functions, vacancies, and extended leaves. At one point, there was only one active EEO citywide.

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or needs to resume service. This is in line with the contractual obligation of Waste Management to the City.⁴⁶

Following up with commercial properties requires staff time to ensure the appropriate service, increasing EEO workload, with the resulting service payments directed to Waste Management. By contrast, the City captures the costs associated with signing up residences for service through the special assessment process under the Finance Department's Revenue Bureau. Additionally, the duties associated with following up with commercial properties are not specific to the knowledge, abilities, and duties of the EEO class specification, though that class specification does include investigating specific complaints as a duty and the ability to collect, analyze, and compile data. Reassignment of commercial compliance would allow environmental enforcement officers to focus time on illegal dumping patrols and general outreach and education. As mentioned in Finding 2, the City is considering options to extend special assessments for lack of curbside waste service to commercial properties. We recommend that the City Administrator, in coordination with the relevant department staff, consider reassigning commercial curbside compliance to the Revenue Bureau, similarly to how the City handles special assessments for residential waste requirements.

Recommendation 14: The City Administrator, in coordination with Public Works and the Finance Department, should consider reassigning commercial compliance to the Revenue Bureau to better support the enforcement of lapsed curbside waste service accounts in alignment with the process for residential special assessments.

The City Needs Improved Community Outreach

According to the EPA's 1998 Illegal Dumping Guidebook, effective illegal dumping prevention requires an integrated approach, including site maintenance and controls and community outreach and involvement. The 1998 guidebook also states that local agencies and community organizations must work together to share resources and prevent redundant efforts against illegal dumping.

While outreach is intended to be a portion of EEOs' responsibilities, outreach opportunities are limited due to budget and time constraints, according to EEOs and Public Works management. Supervisors shared that there is no time or budget in regular scheduling for outreach at events.

Box 2

City of Oakland Recycling Hotline

For questions about recycling, you can contact the City's Recycling Hotline via email at recycling@oaklandca.gov or call 510-238-7283.

StopWaste Re:Source

You can search StopWaste's Re:Source guide to determine how to legally dispose of unwanted items by zip code at <https://resource.stopwaste.org/curbside>

⁴⁶ Mixed Materials & Organics Collection Services Agreement Executed between the City of Oakland and Waste Management of Alameda County, Inc 2015: Sections 7.13.6 through 7.13.9.

The outreach by EEOs mostly focuses on the promotion of bulky pickup service and how to sort waste correctly but having an audience in the field is rare and generally limited to interaction with businesses or residences suspected of dumping or having insufficient service. Outreach materials are also sent with citations, including informational flyers on reduced-cost service, sorting correctly, and free bulky pickup service. The Solid Waste and Recycling Division of Public Works also sends out mailers to residents annually with information about waste sorting and the bulky pickup program.

According to the 1998 EPA Illegal Dumping Guidebook, community clean ups have proven effective in addressing illegal dumping, and in some cases organized community groups are the main facilitators of information exchange and involvement among residents. Oakland has several community groups and individuals interested in reducing the amount of illegal dumping in the city.⁴⁷ Organized neighborhood clean ups could help to promote outreach and awareness of services, including bulky pickup and 311 reporting, and address litter and illegally dumped waste in neighborhoods. A greater focus on outreach could also increase awareness of legal hauling methods and services available and deter the hiring of unlicensed haulers who may dump illegally, as mentioned in Finding 2.

Recommendation 15: Public Works should consider reallocating Environmental Enforcement Unit staff to increase proactive education and outreach efforts to increase use and awareness of legal waste disposal services and warn against illegal dumping and the hiring of illegal haulers.

Illegal Dumping Cleanups Appear Effective and Timely, Except at Sites that Experience Recurring Dumping

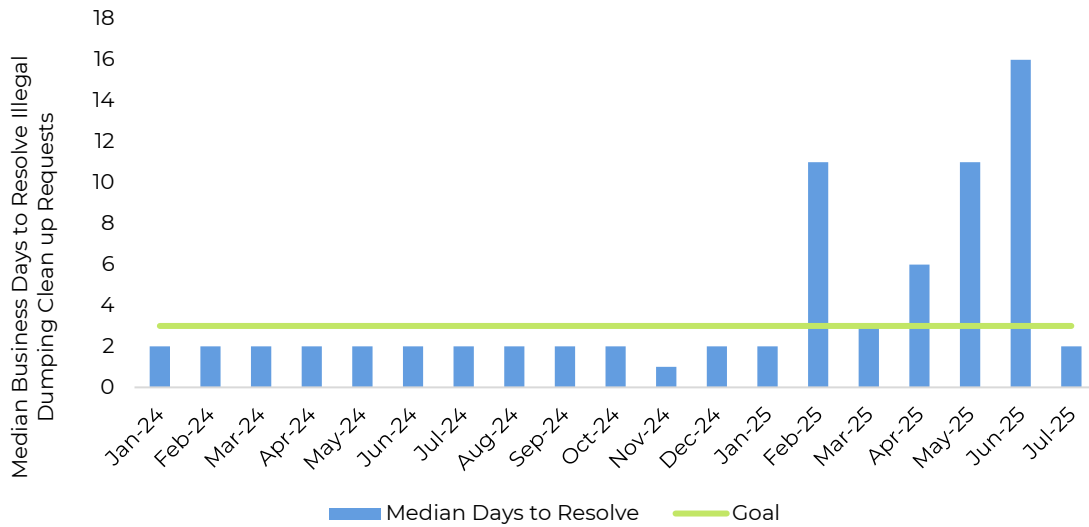
Based on City 311 data, in 2024, clean up crews effectively met their goal of resolving 85 percent of work orders within three business days, most of which were initiated through 311 reports. Due to data limitations, it is unclear how many unreported instances of illegal dumping are abated by the City or how quickly. In 2024, illegal dumping clean up crews' average monthly median time to resolve an illegal dumping request was two business days.

Regular clean ups resulting from service requests appeared efficient and timely in 2024, but they represent a reactive rather than proactive approach. The average of monthly median times to resolve an illegal dumping request rose to a peak of 16 days in June 2025. Public Works leadership explained that this spike was a result of the department experimenting with a more proactive model of debris removal. They noted that while a similar volume of debris was removed from Oakland streets during this experiment, it led to frustration within the community. Public Works has since returned to a 311 complaint-based response to illegal dumping due to limited resources, and response times returned to their target level (see Exhibit 23).

⁴⁷ Anna Bauman, "He's on a mission to clean up Oakland. why does the trash keep coming back?" San Francisco Chronicle. September 26, 2025. <https://www.sfchronicle.com/eastbay/article/trash-garbage-dumping-oakland-21022346.php>

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Exhibit 23: In 2025, Clean Up Crew Response to Illegal Dumping Clean Up Requests Slowed

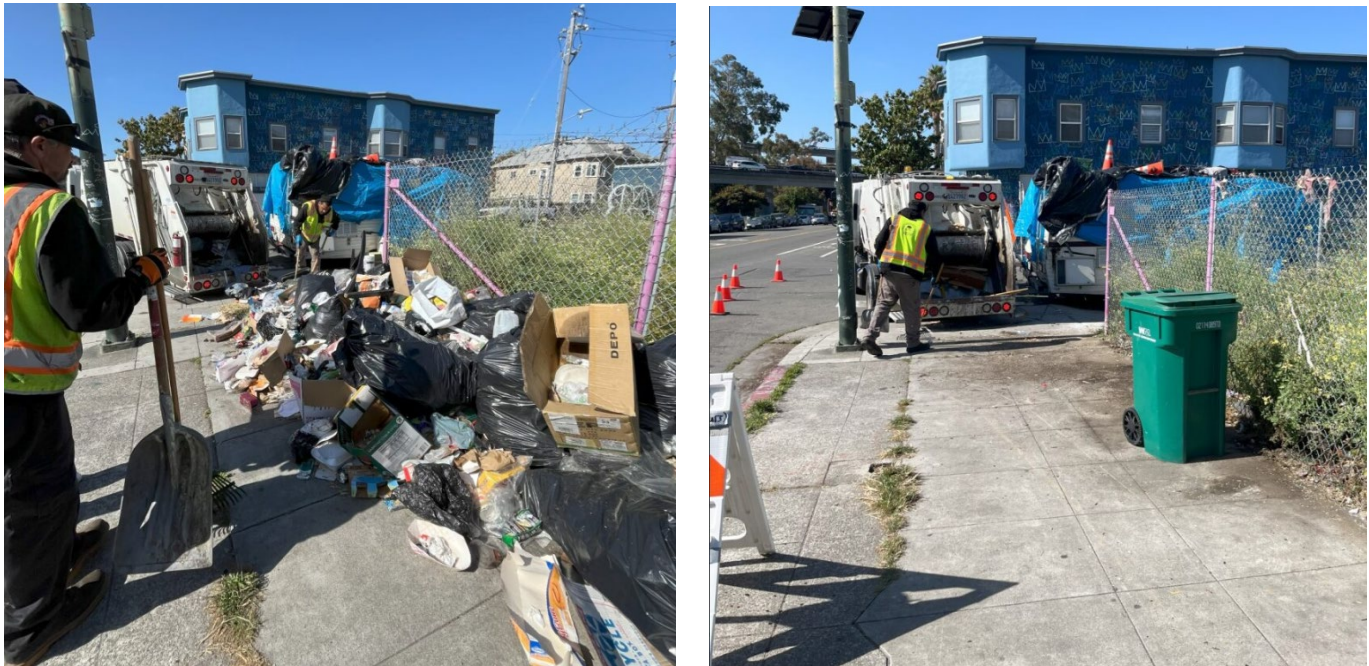


Source: Auditor analysis of data from Cityworks, Public Works’ asset management and workorder system, showing median business days to resolve illegal dumping clean up requests. The green line represents the Public Works goal of 85 percent of clean up requests resolved within 3 business days.

Residents we spoke to attested to the effectiveness and responsiveness of KOCB crews but noted that recurrent dumping was a regular issue. As a result, residents may not see the benefits of quick clean ups for long.

As a general practice, clean up work is documented internally through before and after photographs for supervisors to review depending on priority level. This provides a control on the quality and completeness of crews’ work (see Exhibit 24 below). The City should consider enabling before and after pictures to be submitted to 311 reporters, as staff already do for supervisors, to demonstrate the effectiveness of clean ups and to promote reporting via 311.

Exhibit 24: Illegal Dumping Clean Ups are Effective



Source: Auditor photos of an illegal dumping clean up before and after.

Recommendation 16: Public Works and the City Administrator’s Office, which supports and staffs the City’s 311 program, should consider uploading before and after photos as updates to SeeClickFix reporters to encourage continued reporting by the public and display the effectiveness of clean up crews.

The City Administrator’s Office Should Work to Expand 311 Reporting to Meet the City’s Equal Access Ordinance

The City’s 311 system is housed within the City Administrator’s Office. Most illegal dumping clean ups are in response to a 311 report. Phone reports are less convenient because the City’s 311 call center has limited hours, 8:00 am to 7:00 pm. Currently, the City’s online 311 system, SeeClickFix, is only available in English, requiring non-English speakers to report by phone.

According to the City’s Equal Access Ordinance, all applications or forms to receive a department’s program or benefits must be available in any language spoken by at least 10,000 Oakland residents who are Limited English Speaking. Currently, these languages are Spanish and Chinese. Staff report that the City would have to set up specific software environments and integrations for each specific language, which would be an extremely heavy and expensive lift for which City does not currently have the resources. While this recommendation may take time to implement, the City should work towards expanding online 311 reporting to allow equal access to limited English-speaking residents, as required by the City’s Equal Access Ordinance.

Recommendation 17: The City Administrator’s Office should expand online 311 reporting to allow use in other languages, as required by the City’s Equal Access Ordinance.

RECOMMENDATIONS

Recommendations

RECOMMENDATION 1: To ensure Oakland residents have affordable access to legal waste disposal methods, Public Works and the City Attorney’s Office should renegotiate the contract with its contracted hauler or assess options for other haulers through a competitive selection process at the next renewal date, to reduce hauling rates per volume and promote transparency by detailing cost components of the rates to allow adjustments to City services.

RECOMMENDATION 2: Public Works, in collaboration with the City’s contracted hauler, should assess options to provide reduced-cost service to low-income residents, including renters, to encourage service volume increases where needed without increasing the rent burden.

RECOMMENDATION 3: Public Works should increase outreach and education on bulky pickup appointments, and improve ease of use, especially for multi-family buildings, to increase use of free bulky pickups to residents and decrease the amount of bulky material dumped on public property or hauled illegally.

RECOMMENDATION 4: Public Works should ensure contract benefits are maximized, including the full use of allocated bins by the offices of the City Councilmembers and the Mayor, or divert unused bin allotments to benefit residents, such as through grants to, or partnerships with, community organizations or programs like Adopt-a-Spot, or City-sponsored bulky block parties.

RECOMMENDATION 5: To streamline enforcement of lapses in commercial curbside waste hauling service, the City Administrator, in coordination with the Finance Department and Public Works, should institute special assessments on commercial properties without service, similarly to how it does on residential properties, and/or revise the contract to authorize the City’s contracted hauler to notice commercial properties, with the City issuing penalties as required.

RECOMMENDATION 6: The City of Oakland should consider increasing fines for illegal dumping to match those proposed by Alameda County, to promote consistent enforcement regionally.

RECOMMENDATION 7: In coordination with the Public Works Department and the Police Department, the City Administrator’s Office and the City Attorney’s Office should assess opportunities, budget, and staffing for collaboration with County departments, such as regular regional illegal dumping strategy meetings and coordination with the Alameda County Sheriff’s Office and District Attorney’s Office, to bolster enforcement of illegal dumping in Oakland and increase consistency in enforcement regionally.

RECOMMENDATION 8: The Environmental Enforcement Unit should finalize its strategy, goals, policies and procedures, and training documents. The Unit should align strategy, goals, policies and procedures to support staff management.

RECOMMENDATION 9: The Environmental Enforcement Unit should ensure all field staff receive adequate training on enforceable offenses related to illegal dumping, including major violations such as dumping hazardous material and illegally hauling waste, to ensure environmental crimes are being enforced appropriately.

RECOMMENDATIONS

RECOMMENDATION 10: Public Works should develop a policy and procedure to ensure all citation documentation for collections is sent promptly to the Finance Department's Collections Unit and with complete documentation.

RECOMMENDATION 11: The Environmental Enforcement Unit should introduce protocols for referral to the General Crimes Unit for criminal illegal dumping investigations, including criteria on the level of evidence required for misdemeanor citations.

RECOMMENDATION 12: The City Administrator's Office, in coordination with the Public Works Department, Police Department, Code Enforcement Services, and City Attorney's Office, should develop a strategy for collaboration on illegal dumping remediation and enforcement, such as a task force with regular meetings and interdepartmental referral systems between City departments.

RECOMMENDATION 13: Public Works should formally evaluate and review the effectiveness of fieldwork and camera-based citation strategies and adjust the strategies accordingly to increase the number and quality of citations per camera and decrease Environmental Enforcement Officer hours spent monitoring low-impact cameras.

RECOMMENDATION 14: The City Administrator, in coordination with Public Works and the Finance Department, should consider reassigning commercial compliance to the Revenue Bureau to better support the enforcement of lapsed curbside waste service accounts in alignment with the process for residential special assessments.

RECOMMENDATION 15: Public Works should consider reallocating Environmental Enforcement Unit staff to increase proactive education and outreach efforts to increase use and awareness of legal waste disposal services and to warn against illegal dumping and the hiring of illegal haulers.

RECOMMENDATION 16: Public Works and the City Administrator's Office, which supports and staffs the City's 311 program, should consider uploading before and after photos as updates to SeeClickFix reporters to encourage continued reporting by the public and display the effectiveness of clean up crews.

RECOMMENDATION 17: The City Administrator's Office should expand online 311 reporting to allow use in other languages, as required by the City's Equal Access Ordinance.

OBJECTIVES, SCOPE & METHODOLOGY

Objectives

The objectives of this audit were to:

- identify potential sources of illegal dumping in Oakland,
- review whether funds have been used to effectively reduce illegal dumping,
- identify workload and/or process improvements for removing illegally dumped waste, citing violators, and/or preventing recurrent dumping, and
- assess accessibility and familiarity of services to mitigate illegal dumping, including free bulky pickup, and 311 reporting.

Audit Scope

The scope of the audit focused on data from 2019 through 2025, though data as early as 2013 is presented to visualize trends.

Methodology

To meet the above objectives, we reviewed management controls relevant to the objectives and:

- Reviewed legal requirements for waste hauling and prohibitions on illegal dumping in the Oakland Municipal Code and federal and state law.
- Identified and benchmarked means for legitimate waste disposal and hauling, including curbside service and bulky pick-up. We selected jurisdictions for benchmarking based on their proximity to Oakland and their hauling service provider.
- Identified potential sources of illegal dumping through field visits and observations, testimony, and an analysis of potential sources and incentives according to best practice literature.
- Analyzed and mapped 311 work-order data pertaining to illegal hauling clean up requests.
- Analyzed data on the use of curbside service, bulky pick-ups, and community dumpsters.
- Reviewed program structure, staffing, budget, and workload and performance data for environmental enforcement and illegal dumping clean up crews.
- Reviewed how the City monitors proper waste disposal, as well as the City's contracts for curbside service.
- Reviewed the process for reduced-cost bin sign-up.
- Observed illegal dumping clean up staff, street litter can pick-up by the City's hauling service provider, and Environmental Enforcement Officers.
- Interviewed Public Works leadership and management staff on strategies and problems associated with illegal dumping.

OBJECTIVES, SCOPE & METHODOLOGY

- Reviewed academic and best practice literature on factors associated with illegal dumping, including vacancy, health impacts, beautification, and cost of service.
- Interviewed administrative staff in the Departments of Finance and Public Works to understand the process for administering and collecting on citations.
- Interviewed 311 staff to understand the workorder triaging process and process for handling calls as well as reports from SeeClickFix.
- Interviewed community advocates, Alameda County staff, City of Oakland Planning and Building Department leadership, and Oakland Police Department leadership to understand interdepartmental coordination and the impact of illegal dumping on the community.
- Interviewed staff in Code Enforcement, the City Attorney's Office, and OPD on interdepartmental efforts to address illegal dumping.

STATEMENT OF COMPLIANCE

Statement of Compliance

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.

ADMINISTRATION'S RESPONSE

Administration's Response

We presented the audit's findings, conclusions, and recommendations to the City Administration, including staff from the Department of Public Works. The Administration's response to the audit's recommendations is below.



Rec#	City Auditor’s Recommendations	Management Action Plan	Responsible Party	Target Date for Completion
1	To ensure Oakland residents have affordable access to legal waste disposal methods, Public Works and the City Attorney’s Office should renegotiate the contract with its contracted hauler or assess options for other haulers through a competitive selection process at the next renewal date, to reduce hauling rates per volume and promote transparency by detailing cost components of the rates to allow adjustments to City services.	Management agrees. This has been a subject of negotiations between the City and the waste hauler.	Public Works	June 30, 2027
2	Public Works, in collaboration with the City’s contracted hauler, should assess options to provide reduced-cost service to low-income residents, including renters, to encourage service volume increases where needed without increasing the rent burden.	Management agrees. This has been a subject of negotiations between the City and the waste hauler.	Public Works	June 30, 2027
3	Public Works should increase outreach and education on bulky pickup appointments, and improve ease of use, especially for multi-family buildings, to increase use of free bulky pickups to residents and decrease the amount of bulky material dumped on public property or hauled illegally.	Management agrees. The City is performing this outreach and education to increase knowledge and use of free bulky waste services, which all residents, including renters, can use each year from Waste Management. This includes launching content on IKE Kiosks and the City’s share of electronic billboard use, partnering with community groups to spread the word, including through murals and emails and social media, handouts at community events in multiple languages, and gaining funding to further increase such outreach and education.	Public Works	June 30, 2027



Rec#	City Auditor’s Recommendations	Management Action Plan	Responsible Party	Target Date for Completion
4	Public Works should ensure contract benefits are maximized, including the full use of allocated bins by the offices of the City Councilmembers and the Mayor, or divert unused bin allotments to benefit residents, such as through grants to, or partnerships with, community organizations or programs like Adopt-a-Spot, or City-sponsored bulky block parties.	Management agrees.	Public Works	June 30, 2027
5	To streamline enforcement of lapses in commercial curbside waste hauling service, the City Administrator, in coordination with the Finance Department and Public Works, should institute special assessments on commercial properties without service, similarly to how it does on residential properties, and/or revise the contract to authorize the City’s contracted hauler to notice commercial properties, with the City issuing penalties as required.	Management agrees. A staff report and legislation are being prepared for submission to City Council in June 2026.	Public Works	12/31/2026
6	The City of Oakland should consider increasing fines for illegal dumping to match those proposed by Alameda County, to promote consistent enforcement regionally.	Management agrees. City Council adopted fine increases in April 2026.	City Council	Completed
7	In coordination with the Public Works Department and the Police Department, the City Administrator’s Office and the City Attorney’s Office should assess opportunities, budget, and staffing for collaboration with County departments, such as regular regional illegal dumping strategy meetings and coordination with the Alameda County Sheriff’s Office and District Attorney’s Office, to bolster enforcement of illegal dumping in Oakland and increase consistency in enforcement regionally.	Management agrees. A project manager in the City Administrator’s Office is currently performing an interagency coordinating role, participating in Countywide, Regional, and Statewide Illegal Dumping coordination, strategy, and convenings. This work includes identifying funding, policies, and resources with State, County, and other partners, including to advance countywide enforcement strategies.	City Administrator/ Public Works	Complete



Rec#	City Auditor’s Recommendations	Management Action Plan	Responsible Party	Target Date for Completion
8	The Environmental Enforcement Unit should finalize its strategy, goals, policies and procedures, and training documents. The Unit should align strategy, goals, policies and procedures to support staff management.	Management agrees. OPW is actively in the process of enhancing EEU strategies and procedures, including creating a workflow analysis and Cityworks process for inputting and tracking enforcement actions, to support better alignment of goals and policies. This system will be better able to identify actions and outcomes, and improve enforcement and collection of penalties. This work will be strengthened by acquiring the technology (eg tablets) and applications as recommended in the forthcoming Illegal Dumping Expenditure Action Plan.	Public Works	June 30, 2027
9	The Environmental Enforcement Unit should ensure all field staff receive adequate training on enforceable offenses related to illegal dumping, including major violations such as dumping hazardous material and illegally hauling waste, to ensure environmental crimes are being enforced appropriately.	Management agrees.	Public Works	June 30, 2027
10	Public Works should develop a policy and procedure to ensure all citation documentation for collections is sent promptly to the Finance Department’s Collections Unit and with complete documentation.	Management agrees. Public Works is in the process of developing a new illegal dumping citation case management module for Cityworks, the city’s asset management software platform, to better	Public Works	June 30, 2027



Rec#	City Auditor’s Recommendations	Management Action Plan	Responsible Party	Target Date for Completion
		track citation and ensure a streamlined process with payments and collections.		
11	The Environmental Enforcement Unit should introduce protocols for referral to the General Crimes Unit for criminal illegal dumping investigations, including criteria on the level of evidence required for misdemeanor citations.	Management agrees.	Public Works	June 30, 2027
12	The City Administrator’s Office, in coordination with the Public Works Department, Police Department, Code Enforcement Services, and City Attorney’s Office, should develop a strategy for collaboration on illegal dumping remediation and enforcement, such as a task force with regular meetings and interdepartmental referral systems between City departments.	Management partially agrees. Continuing since January, the City Administrator’s Office has regularly convened Police, Public Works, and the City Attorney’s office on these referral systems. Code Enforcement will be included as needed.	City Administrator	Complete
13	Public Works should formally evaluate and review the effectiveness of fieldwork and camera-based citation strategies and adjust the strategies accordingly to increase the number and quality of citations per camera and decrease Environmental Enforcement Officer hours spent monitoring low-impact cameras.	Management partially agrees. Public Works will continue to review the effectiveness of its illegal dumping fieldwork and cameras, and seek to reduce EEO hours reviewing video that does not yield citations. With the help of the Mayor’s office, we are exploring whether AI-enabled technology may expedite footage review, too. Yet citation numbers should not be the determinative criteria for camera placement—sometimes a camera is preventing citable behavior from occurring, and judgments about camera placement are very location	Public Works	June 30, 2027



Rec#	City Auditor’s Recommendations	Management Action Plan	Responsible Party	Target Date for Completion
		specific. Also, City Council’s adopted April 2026 policy make it an offense to transport waste in a vehicle without a license plate, which may assist in making camera systems more effective.		
14	The City Administrator, in coordination with Public Works and the Finance Department, should consider reassigning commercial compliance to the Revenue Bureau to better support the enforcement of lapsed curbside waste service accounts in alignment with the process for residential special assessments.	Management agrees. City Administrator, Public Works, and Finance will consider this.	City Administrator, Public Works	Complete
15	Public Works should consider reallocating Environmental Enforcement Unit staff to increase proactive education and outreach efforts to increase use and awareness of legal waste disposal services and to warn against illegal dumping and the hiring of illegal haulers.	Management agrees. The EEOs already perform this work occasionally and, as the unit is re-staffed, there will more opportunities for proactive education and outreach. Current efforts include handouts at community events and community organizations in multiple languages, launching educational content on IKE Kiosks and on the City’s share of use of electronic billboards, partnering with community groups to spread the word, including through murals and emails and social media, and pursuing funding to further increase such outreach and education.	Public Works	June 30, 2027



Rec#	City Auditor’s Recommendations	Management Action Plan	Responsible Party	Target Date for Completion
16	Public Works and the City Administrator’s Office, which supports and staffs the City’s 311 program, should consider uploading before and after photos as updates to SeeClickFix reporters to encourage continued reporting by the public and display the effectiveness of clean up crews.	Management agrees. Public Works is deploying iPads to the Illegal Dumping Unit and is configuring their use for this purpose. In addition, the recently approved Aerbits technology pilot program may assist in before-and-after footage collection for cleanups.	Public Works	December 31, 2026
17	The City Administrator’s Office should expand online 311 reporting to allow use in other languages, as required by the City’s Equal Access Ordinance.	Management agrees. OPW is discussing these improvements with the software provider (SeeClickFix) and expects to receive a plan and timeline before June 30, 2026.	Public Works	June 30, 2027



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Office of the City Auditor

CITY AUDITOR

Michael C. Houston, MPP, CIA

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