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April 7, 2026

The Honorable Catherine Blakespear  
California State Senate  
1021 O Street, Room 7720  
Sacramento, CA 95814

**RE: SB 866 (Blakespear) Homeless Housing, Assistance, and Prevention program: housing element.**  
**Notice of OPPOSE UNLESS AMENDED**

Dear Senator Blakespear,

The City of Rio Dell must respectfully **oppose your SB 866 (Blakespear) unless amended**. SB 866 would require all but 14 cities to add extensive homelessness reporting requirements to their housing elements, targeting cities that do not receive state funding to address homelessness.

The state's flagship homelessness grant program, the Homeless Housing, Assistance, and Prevention (HHAP) Grant program, allocates funding to all 58 counties, 44 continuums of care, and cities with populations over 300,000. This means that only 14 cities in California are receiving direct state homelessness funding through HHAP.

To receive HHAP funding, grantees must submit a regionally coordinated homelessness action plan to the Housing and Community Development Department that includes specific system performance measures. SB 866 would **copy** these system performance measures from the HHAP regional plans and impose them as a separate reporting requirement **only** on cities not receiving state funding — forcing them to track these metrics in their housing elements.

Specifically, SB 866 would require all but 14 cities to provide detailed reports on available homelessness resources, actions taken to connect individuals to those resources, and various data points. For example, SB 866 requires cities to share information about the number of people who become homeless after exiting institutional settings, including jails, prisons, and hospitals, and the number of people who become unhoused after moving into permanent housing.

SB 866 also requires cities to describe how they are coordinating services under the Behavioral Health Services Act and identify any available mental and

behavioral health funding. Counties, not cities, provide behavioral health services in California and receive all the funding to do so. SB 866 does not currently apply to counties because it only applies to local governments that **do not** receive HHAP. As a result, SB 866 places the burden on cities to report on and plan for services beyond their control, requiring significant reporting on county-led functions within a city's housing planning document – requirements that cities are not well-positioned to fulfill.

There is a reason these system performance metrics are currently in the HHAP regional planning process – because gathering this data requires collaboration with counties, prisons, hospitals, VAs, and other stakeholders. These requirements create significant administrative burdens for communities that **already** do not receive state financial support to address homelessness. Nearly all cities lack the infrastructure to collect the data required by SB 866, making compliance nearly impossible.

Additionally, while HHAP regional plans are updated each year that funding is available, most communities update their housing elements every eight years. The City of Rio Dell fails to see how collecting this data every eight years, when much of this information is collected annually through Continuums of Care point-in-time counts, would help address the evolving needs of unhoused residents in our community.

The City of Rio Dell understands the goal of increasing transparency around the efforts of smaller cities to address the state's homelessness crisis. Currently, cities that do not receive HHAP funding are encouraged to participate in HHAP regional planning but are not required to do so. The City of Rio Dell is requesting amendments that require smaller cities to have a seat at the table for the regional planning process. This will accomplish the same goal, providing transparency into the same system metrics that SB 866 includes, but through the same regional process already used by California's largest cities.

Each year, the Legislature introduces bills that change the rules mid-stream, significantly complicating cities' efforts to secure housing element certification. These multiyear planning efforts are already complex, time-consuming, and expensive. SB 866 would add yet another layer of reporting requirements — through a non-reimbursable state mandate — placing a disproportionate burden on smaller cities. For many, the challenge of collecting and reporting this data could further jeopardize their ability to achieve a compliant housing element.

The City of Rio Dell urges amendments to SB 866 that ensure consistency with the existing HHAP regional planning process and do not unfairly target California's small cities, which continue to be left out of direct state homelessness funding.

For these reasons, the City of Rio Dell respectfully **opposes your SB 866 (Blakespear) unless amended.**

Sincerely,

Debra Garnes  
Mayor  
City of Rio Dell

cc. Senator Mike McGuire  
Assemblymember Chris Rogers  
Assemblymember Cecilia Aguiar-Curry  
Sara Sanders, Cal Cities, Regional Public Affairs Manager, [sanders@calcities.org](mailto:sanders@calcities.org)  
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