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May 19, 2026

The Honorable Mike McGuire
Member, California State Senate
1021 O Street, Suite 5130
Sacramento, CA 95814

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

Dear Senator McGuire,

The City of Rio Dell must respectfully **oppose SB 866 (Blakespear)**. 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.

Currently, the state's flagship homelessness grant program, the Homeless Housing, Assistance, and Prevention (HHAP) program, allocates funding to all 58 counties, 44 Continuums of Care (CoCs), and the 14 cities in California with populations over 300,000. To receive HHAP funding, grantees must submit a regionally coordinated homelessness action plan to the Housing and Community Development (HCD) Department that includes specific system performance metrics.

SB 866 would copy these system performance metrics 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. Some of the metrics are nearly impossible for cities to collect. For example, the bill requires cities to share information about the number of people who become homeless after exiting institutional settings, including jails, prisons, and hospitals. These are systems operated by counties, the state, or private entities, not cities.

Additionally, some of the data required under SB 866 is already collected through existing systems. CoCs receive federal funding to conduct annual point-in-time counts to gather key homelessness data. This data includes the number of individuals who are unhoused and if an individual has been unhoused long enough to be considered chronically homeless. Despite this information being

collected and publicly shared by CoCs, SB 866 shifts the responsibility for collecting and reporting it to cities, without providing us with any additional funding to do so.

The data requirements in SB 866 would create significant administrative burdens for communities that already do not receive state financial support to address homelessness. The challenge of collecting and reporting this data may jeopardize our ability to achieve a compliant housing element and potentially subject us to [legal action by the state](#).

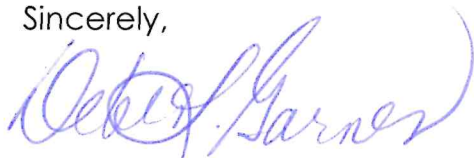
Our city is also concerned that this measure would create siloed data. SB 866 would require over 400 cities to collect and report data independently through their housing elements, while counties and larger cities continue to do so through regional plans. It is unclear how HCD would synthesize this data into meaningful, actionable policy at the statewide level.

Although we understand the goal of increasing transparency around the efforts of smaller cities to address the state's homelessness crisis, it can't be at the expense of burdening the smallest cities with housing element requirements that will not be equally applied to other local governments.

Each year, the Legislature introduces bills that significantly complicate cities' efforts to secure housing element certification. These multi-year 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 these reasons, the City of Rio Dell respectfully opposes SB 866 (Blakespear).

Sincerely,



Debra Garnes
Mayor
City of Rio Dell

CC:
Senator Mike McGuire
Assembly Member Chris Rogers
Sara Sanders, CalCities (via email)
League of California Cities (via email)