

June 23, 2026

The Honorable Matt Haney
Chair, Assembly Housing and Community Development Committee
1020 N Street, Room 156
Sacramento, CA 95814

RE: SB 866 (Blakespear) Homeless Housing, Assistance, and Prevention program: housing element- Oppose

Dear Chair Haney,

The city of San Marcos must respectfully oppose SB 866 (Blakespear) which would require an arbitrary number of cities to report extensive homelessness data in their housing element, targeting cities without direct access to state homelessness funding.

The state's flagship homelessness grant program, the Homeless Housing, Assistance, and Prevention (HHAP) program, provides funding to all counties, Continuums of Care, and the state's largest cities, and requires those recipients to submit regional plans that include performance metrics. SB 866 would take those same metrics and impose them as new reporting requirements on cities that do not receive HHAP funding, requiring them to include this data in their housing elements instead.

Amendments recently committed to by the author would further exempt cities with populations under 50,000 from the bill's requirements. Should these amendments move forward, only a random assortment of 165 cities with populations between 50,000 and 300,000 would need to collect the extensive homelessness data required under SB 866. These arbitrary population thresholds are unrelated to a city's efforts to address homelessness. It is also unclear how the state would even use data from 165 cities to make meaningful statewide policy.

At the same time, the newly proposed HHAP trailer bill removes these reporting requirements for the state's largest cities and counties – jurisdictions that account for over 70% of California's homeless population. As a result, only the 165 mid-sized cities targeted by SB 866 would be required to report this information.

Some of the metrics required under SB 866 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. Despite a city's best intentions, it may be unable to collect this data.

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 reporting this data to cities, without providing 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. For many, the challenge of collecting and reporting this data may jeopardize their ability to achieve a compliant housing element and potentially subject them to legal action by the state.

There is a reason these system performance metrics are currently in the HHAP regional planning process – because large cities, counties, and CoCs receive millions of dollars every year through HHAP, and the state needs to track the outcomes of that investment. Requiring a random assortment of mid-sized cities to report this level of information without providing funding to sustain or expand homelessness programs in their communities will not move California forward in addressing homelessness.

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 cities with the fewest resources. For these reasons, the City of San Marcos respectfully opposes **SB 866 (Blakespear)**.

Sincerely,

Rebecca D. Jones
Mayor