



**CITY OF
HERMOSA BEACH**

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 Hermosa Beach must respectfully oppose 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.



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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 Hermosa Beach 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 Hermosa Beach 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 Hermosa Beach is requesting amendments that require smaller cities to have a seat at the table for the regional planning process.

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 Hermosa Beach 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.

Sincerely,

Michael Detoy
Mayor

cc: Senator Ben Allen, Senate District 24
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