



*Safe, Healthy, and Attractive*

April 10, 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 Paramount 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) 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 receive direct State homelessness funding through HHAP.

To receive HHAP funding, grantees must submit a regionally coordinated homelessness action plan to the Department of Housing and Community Development that includes specific system performance measures. SB 866 would copy these system performance measures from 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 report 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

PEGGY LEMONS  
Mayor

BRENDA OLMOS  
Vice Mayor

ISABEL AGUAYO  
Councilmember

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Councilmember

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Councilmember

receive all funding to do so. SB 866 does not 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 collect, track, 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 small cities lack the dedicated infrastructure and personnel 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 Paramount 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 the local unhoused residents in our community.

The City of Paramount 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 Paramount 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 while capturing additional information to be incorporated into the system metrics that SB 866 includes, but it would do so through the existing regional processes already being used by California's largest cities.

As a fully built-out community of 55,000 residents, the City does not operate a homeless services department and does not have access to the institutional-level data the bill requires. Paramount does, however, participate in regional homelessness coordination through the Los Angeles Homeless Services Authority and the Gateway Cities Council of Governments, and SB 866 would duplicate these efforts without providing resources, creating an unfunded mandate. Additionally, adding these requirements to the City's housing element—an already complex and costly eight-year planning process—would significantly increase the administrative burden and could jeopardize timely certification.

The City of Paramount 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.

Oppose SB 866

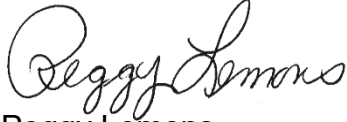
April 10, 2026

Page 3

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For these reasons, the City of Paramount respectfully opposes SB 866 (Blakespear) unless amended. Please feel free to contact City Manager John Moreno at (562) 220-2225, if you have any questions. We thank you for your time and consideration.

CITY OF PARAMOUNT

A handwritten signature in black ink that reads "Peggy Lemons". The signature is written in a cursive, flowing style.

Peggy Lemons  
Mayor

Cc: Honorable Congresswoman Nanette Barragan, 44th District  
Honorable Assemblymember Jose Luis Solache, 62nd District  
Honorable State Senator Lena Gonzalez, 33rd District  
Nicholas Cabeza, Public Affairs Manager, League of California Cities  
Jorge Morales, Legislative and Governmental Affairs Consultant, California Contract Cities Association