



April 9, 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
Oppose Unless Amended – City of Upland**

Dear Senator Blakespear,

The City of Upland 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 jurisdictions that do not receive direct state funding from the Homeless Housing, Assistance, and Prevention (HHAP) program.

HHAP funds counties, continuums of care, and only the largest cities, leaving many jurisdictions like Upland without direct support. SB 866 would replicate HHAP's required system metrics as a separate reporting mandate for cities not receiving this funding. This includes detailed data on homelessness inflows and outflows, service coordination, and behavioral health resources.

These requirements are misaligned with how homelessness services are delivered. Counties are responsible for behavioral health services and receive the associated funding, but SB 866 puts the reporting burden on cities. The needed data is already collected through regional processes that involve coordination with counties, healthcare systems, and other partners. Requiring cities to duplicate this effort in their housing elements creates unnecessary and burdensome reporting obligations.

For the City of Upland, SB 866 would impose a new unfunded mandate requiring the City to collect and report data it does not currently track and, in many cases, cannot access. Upland participates in regional homelessness efforts, where this data is already compiled, but the City does not control county-administered services or maintain the infrastructure needed to independently gather this information. Compliance would require additional staff time and resources and could increase the risk of falling out of compliance with state housing element law.

SB 866 also creates a mismatch in planning timelines. Housing elements are updated every eight years, while homelessness data is collected and updated annually. Embedding rapidly changing data into a long-term planning document drastically limits its usefulness and does not improve outcomes for individuals experiencing homelessness.



City of Upland

Mayor's Office

The City of Upland supports increased transparency and coordination, but believes these goals are best achieved through the existing HHAP regional planning framework. The City respectfully requests amendments that ensure smaller cities have a formal role in regional planning efforts, rather than imposing duplicative, unfunded reporting requirements.

For these reasons, the City of Upland respectfully opposes SB 866 (Blakespear) unless amended.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bill Velto".

Bill Velto
Mayor, City of Upland

CC: Laura Varela, League of California Cities