




THE CITY OF SAN DIEGO

MEMORANDUM

DATE: April 15, 2026

TO: Honorable Council President Joe LaCava and Members of the City Council

FROM: Heidi Vonblum, City Planning Department Director  
via Casey Smith, Chief Housing and Community Development Officer 

SUBJECT: Updated Senate Bill 79 Overview and Compliance Options

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This memorandum provides an update to information provided via [memorandum on February 13, 2026 regarding Senate Bill 79 \(SB 79\) requirements and compliance options](#). Specifically, this memorandum provides updated information based on recently-issued guidance from the California Department of Housing and Community Development (HCD) in its [SB 79 Advisory Clarifications on Definitions for Metropolitan Planning Organizations](#) (HCD Advisory), which was issued on March 20, 2026. This guidance includes HCD's interpretations of key terms referenced in SB 79, including interpretations for identification of qualifying transit-oriented development (TOD) stops under SB 79.

As summarized in the February 13, 2026 memorandum, the City Planning Department, in coordination with SANDAG, had previously determined that SB 79 applied only to the City's trolley stations as no bus stops in the City have services that currently meet the definition of bus rapid transit in [California Public Resources Code Section 21060.2](#). However, the HCD Advisory provides that "[a] qualifying bus service TOD stop is a location where the bus stop is adjacent to a full-time dedicated transit lane and the average bus service intervals across the combined morning and afternoon peak periods is 15 minutes or less."

For San Diego, this means that under HCD's interpretation, four additional rapid bus stops qualify as TOD stops under SB 79 in addition to the previously-identified trolley stations. These four additional stops include the bus stops at Park Boulevard and Howard Avenue, Park Boulevard and University Avenue, the transit plaza at Interstate 15 and El Cajon Boulevard, and the transit plaza at Interstate 15 and University Avenue. Updated maps are attached to this memorandum showing these additional TOD stops. These maps are the same as the maps attached to the February 13, 2026 memorandum with the addition of the four additional bus stops.

Pursuant to SB 79, SANDAG still must determine SB 79's application to transit stops in the region, and the City is still required to implement SB 79 based on SANDAG's identified transit stops. SANDAG has not released its SB 79 map, meaning that this information continues to be subject to change.

However, based on the most recent information adding in the four additional bus rapid stops, this memorandum provides updated information and analysis applicable to San Diego. First, Table 2, SB 79 Required Zoning Capacity in City of San Diego TOD Zones is updated as follows:

**Table 2**  
**SB 79 Required Zoning Capacity in City of San Diego TOD Zones**

	Estimated Home Capacity
SB 79 Required Home Capacity	861,000
Existing Base Zone Home Capacity	494,000
Additional SB 79 Home Capacity Required	<b>367,000</b>

It continues to be important to note that SB 79 allows the City to account for its local density bonus programs in determining total additional home capacity required. The City's [Affordable Housing Regulations](#), [ADU Home Density Bonus](#) regulations, and [Complete Communities Housing Solutions](#) Regulations allow for density that exceeds the base zone and could also be counted toward the City's requirement to identify additional home capacity, which the City Planning Department will continue to analyze and apply where allowed, meaning that the additional capacity required could be less than the 367,000 identified above.

Table 3, Overview of SB 79 Local Conditions is also updated as follows:

**Table 3**  
**Overview of SB 79 Local Conditions**

	Acres in TOD Zones	Percent of TOD Zones	Approximate Total SB 79 Required Home Capacity
Very High Fire Hazard Severity Zones (Attachment 2) <sup>1</sup>	4,980	32%	424,000
Areas Outside of 1 Mile Walk (Attachment 3)	989	6%	77,000
Low Resource Opportunity Areas (Attachment 4)	4,050	26%	343,000
Sites with Historic Resource Designation on Local Register (Attachment 5)	165	1%	14,400
Sites Vulnerable to 1 Foot Sea Level Rise (Attachment 6)	150	1%	15,000
Sites that are not in Low Resource Opportunity Areas, Very High Fire Hazard Severity Zones, historic sites, or subject to 1 foot sea level rise (Attachment 7)	2,592	16%	241,000
Moderate, High, Highest Resource Opportunity Areas that contain Very High Fire Hazard Severity Zones, designated historic sites, or areas subject to 1 foot of sea level rise	3,720	24%	313,000

<sup>1</sup> Pursuant to Senate Bill 99 (SB 99), the City Planning Department is required to separately map residential development located in hazard areas – including fire hazard severity zones – that lack at least two emergency evacuation routes, such as dead end streets and cul-de-sacs.

April 15, 2026

The City Planning Department continues to welcome feedback from the City Council and is available for questions, discussion and feedback throughout the process.

Sincerely,



Heidi Vonblum  
City Planning Director

HV/sl

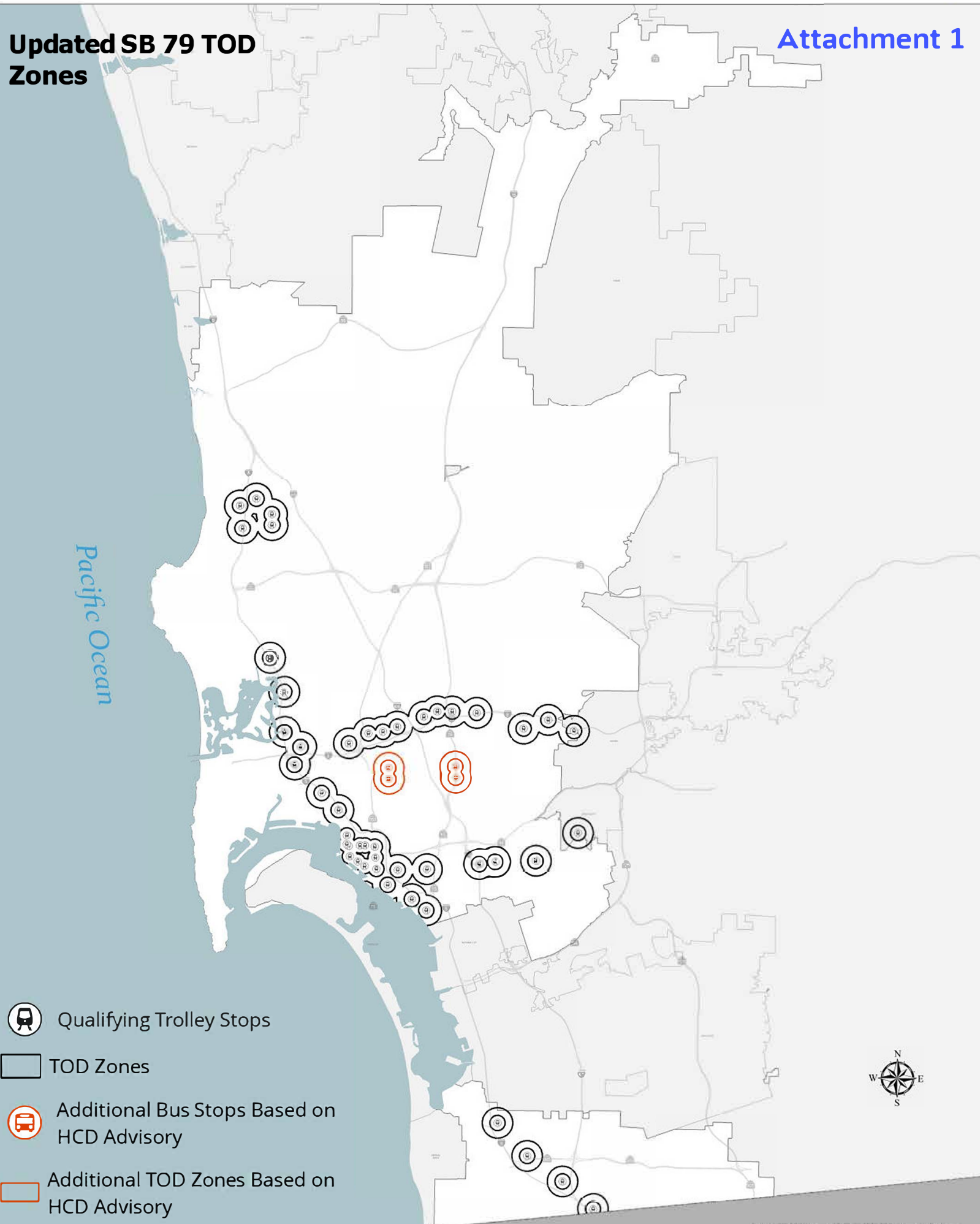
Attachments:





1. Updated SB 79 TOD Zones
2. Updated SB 79 TOD Zones within Very High Fire Hazard Severity Zones
3. Updated SB 79 TOD Zones Outside of One Mile Walking Distance
4. Updated SB 79 TOD Zones in Low Resource Areas
5. Updated SB 79 TOD Zones with Designated Historic Sites
6. Updated SB 79 TOD Zones on Sites Subject to 1 Foot Sea Level Rise
7. Updated SB 79 TOD Zones Required to Implement July 1, 2026
8. Updated SB 79 Areas Eligible to Implement After July 1, 2026

cc: Honorable Mayor Todd Gloria  
Honorable City Attorney Heather Ferbert  
Honorable Council President and Members of the City Council  
Paola Avila, Chief of Staff, Office of the Mayor  
Nick Serrano, Deputy Chief of Staff, Office of the Mayor  
Charles Modica, Independent Budget Analyst  
Casey Smith, Chief Housing & Community Development Officer, Office of the Mayor  
Matt Yagyagan, Director of Policy, Office of the Mayor  
Chris Ackerman-Avila, Senior Policy Advisor, Office of the Mayor  
Elyse Lowe, Director, Development Services Department  
Corrine Neuffer, Chief Deputy City Attorney  
Tait Galloway, Deputy Director, City Planning Department  
Kelley Stanco, Deputy Director, City Planning Department  
Seth Litchney, Deputy Director, City Planning Department

# Updated SB 79 TOD Zones

# Attachment 1








-  Qualifying Trolley Stops
-  TOD Zones
-  Additional Bus Stops Based on HCD Advisory
-  Additional TOD Zones Based on HCD Advisory



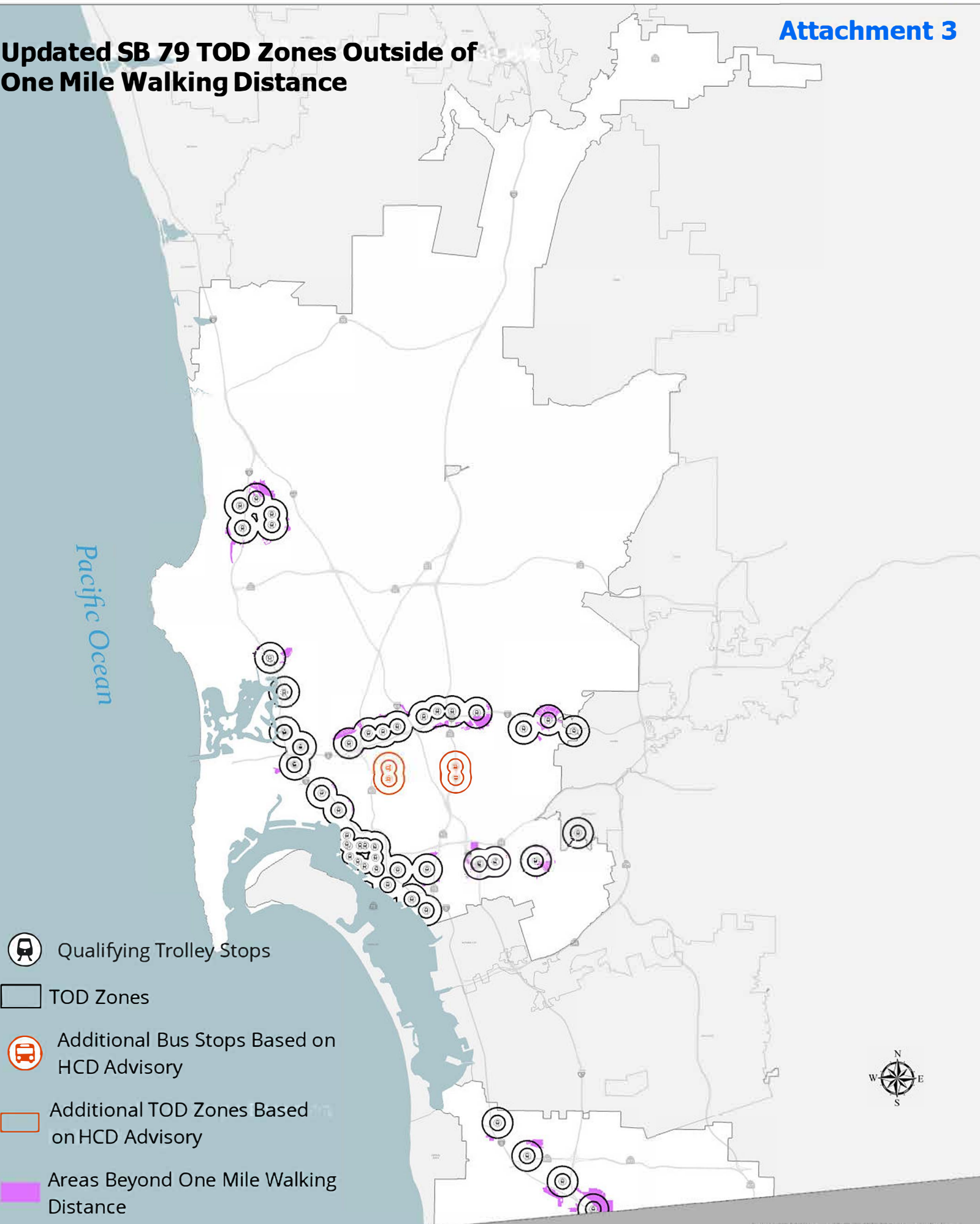
# Updated SB 79 TOD Zones within Very High Fire Hazard Severity Zones






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-  Qualifying Trolley Stops
-  TOD Zones
-  Additional Bus Stops Based on HCD Advisory
-  Additional TOD Zones Based on HCD Advisory
-  Areas within Very High Fire Hazard Severity Zones



# Updated SB 79 TOD Zones Outside of One Mile Walking Distance








-  Qualifying Trolley Stops
-  TOD Zones
-  Additional Bus Stops Based on HCD Advisory
-  Additional TOD Zones Based on HCD Advisory
-  Areas Beyond One Mile Walking Distance



# Updated SB 79 TOD Zones in Low Resource Areas






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-  Qualifying Trolley Stops
-  TOD Zones
-  Additional Bus Stops Based on HCD Advisory
-  Additional TOD Zones Based on HCD Advisory
-  Areas identified in Low Resource Area



# Updated SB 79 TOD Zones with Designated Historic Sites






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-  Qualifying Trolley Stops
-  TOD Zones
-  Additional Bus Stops Based on HCD Advisory
-  Additional TOD Zones Based on HCD Advisory
-  Areas with historically-designated resources



# Updated SB 79 TOD Zones on Sites Subject to 1 Foot Sea Level Rise






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-  Qualifying Trolley Stops
-  TOD Zones
-  Additional Bus Stops Based on HCD Advisory
-  Additional TOD Zones Based on HCD Advisory
-  Areas affected by approximately one foot of sea level rise in the future



# Updated SB 79 TOD Zones Required to Implement July 1, 2026






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-  Qualifying Trolley Stops
-  TOD Zones
-  Additional Bus Stops Based on HCD Advisory
-  Additional TOD Zones Based on HCD Advisory
-  Areas that will take effect under SB 79 on July 1, 2026



**Updated SB 79 Areas Eligible to Implement After July 1, 2026**

Pacific Ocean

-  Qualifying Trolley Stops
-  TOD Zones
-  Additional Bus Stops Based on HCD Advisory
-  Additional TOD Zones Based on HCD Advisory
-  SB 79 Areas Eligible to Implement After July 1, 2026

