

Date: July 17, 2026.

San Diego Association of Governments (SANDAG)
Attn: Board of Directors
401 B Street, Suite 800
San Diego, CA 92101

Subject: Request for SANDAG Board Public Hearing on Proposed Additional SB 79 Tier 2 TOD Bus Stop Designations

Dear Chair, Board Members, and Regional Planning Staff:

San Diego Association of Governments (SANDAG) has released its Senate Bill 79 (SB 79) Transit-Oriented Development (TOD) Map identifying transit stops that staff have determined qualify as Tier 2 TOD locations. The map designates additional bus stops beyond the four identified by the City of San Diego Planning Department as meeting the statutory requirements of SB 79. The additional stops along El Cajon Boulevard and University Avenue are served by shared bus-and-bicycle lanes that allow vehicle access and do not appear to constitute "full-time dedicated bus lanes," as required by SB 79. Because these additional TOD stops raise significant legal, land use, and community concerns, the Peninsula Community Planning Board (PCPB) requests that any proposal to designate these additional Tier 2 TOD bus stops be considered by the SANDAG Board through a public hearing, transparent process, and formal Board action .

PCPB supports and agrees with the City of San Diego Planning Department's recommendation and determination limiting Tier 2 TOD bus stop designations to facilities that clearly satisfy the statutory requirements of SB 79, including full-time dedicated bus lanes that are exclusive to public transit and meet the required service frequency. The additional proposed bus stops do not appear to meet these statutory criteria and requirements, since the additional stops are on bus-routes that share the lane with bicycles.

The proposed expansion would have significant land use, zoning, and community impacts throughout affected neighborhoods. Because of these far-reaching consequences and the substantial public interest surrounding these designations and future designations, the adoption of the Transit Oriented Development Map and Zones should be considered through a transparent public process before the elected SANDAG Board rather than through administrative action.

PCPB requests that SANDAG schedule this matter for a public hearing so that the legal basis for the proposed designations, the potential community impacts, and public testimony can be fully considered.

Thank you for your consideration and for your commitment to implementing SB 79 in a manner that is transparent, legally defensible, and consistent with the intent of state law.

Sincerely,

Eric Law PCPB Chair