



SB 677 Impact Analysis

January 26, 2026

Introduction

This document analyzes how the proposed changes to SB 79 presented in SB 677 would expand the number of stations eligible for SB 79 and would raise some Tier 2 stations to Tier 1 (higher density).

SB 79 classifies each rail line into one of the following categories: Heavy, Light, Commuter, Amtrak Long Distance Service, California High-Speed Rail, and Freight. The added language in SB 677 for "intercity rail" appears to be redundant because it was already in SB 79's catchall definition for "commuter rail."

The substance of SB 677 relates to the expanded redefinition of *high-frequency commuter rail* from the adopted language of SB 79. As of the January 8 revision, SB 677 makes the following changes to the scope of SB 79:

- SB 677 reduces the level of service measurement for commuter rail from average daily stops to just average weekday stops. (With rare exceptions, commuter line operators reduce service on weekends.)
- SB 677 adds all of the commuter services (lines) together rather than assessing the single highest service as in SB 79.
- These changes do not apply to the determination of *very high frequency commuter rail*.

The above changes do not address any technical questions facing cities that are struggling to implement SB 79's complex regulations. To the contrary, the proposed changes require that regional transportation organizations and cities start over on their SB 79 implementation plans by reevaluating rail stops and levels of service to determine which stops are SB 79-eligible and at which density tier.

For those cities whose SB 79-eligible stations change because of SB 677's expansion of *high-frequency commuter rail*, and unless SB 677 is further amended to postpone SB 79 implementation to align with SB 677's January 1, 2027, deadline, some cities will further need to create one alternative plan for SB 79's current July 1, 2026, deadline, and another alternative plan for the January 1, 2027, deadline.

Impact of SB 677

For San Diego County, the impact of SB 677 is that by adding Amtrak and Coaster services together, Solana Beach would become eligible for SB 79 as a Tier 2 stop. The change to weekday service calculations also brings the rest of the Sprinter stations to just a couple of weekday trains away from becoming Tier 1.

A literal reading of both SB 79 and SB 677 is that light rail qualifies a station as Tier 2 regardless of the level of service (number of stops). Light rail is also excluded from determination of whether commuter rail meets the Tier 1 threshold for *very high frequency commuter rail*. Cities will need to be vigilant to make sure that HCD doesn't exceed its administrative mandate by adding light rail to commuter rail when determining Tier 2 stops, or extrapolate the changes to *high-frequency commuter rail* to *very high frequency commuter rail*. This literalness is especially justified because the January 5, 2026, draft of SB 677 applied the *high-frequency commuter rail* changes to the *very high frequency commuter rail* definition, and then the January 8 draft reverted the *very high frequency commuter rail* definition back to the adopted SB 79 language.

For San Diego County, specifically, under this literal reading of SB 677, Oceanside, San Diego Old Town, and San Diego Downtown remain Tier 2 stops, as was also assessed under SB 79's rules.

Elsewhere in California, SB 677 would change eligibility and density tiers for many Amtrak/Metrolink stops in LA and Orange County (which becomes an urban transit county when the OC Streetcar opens later this year). There is still analysis to be done on Metrolink and other regional commuter rail connections outside of Amtrak stations, so the number of affected stations may increase when that analysis is completed.

A detailed analysis of the proposed SB 677 changes follows.

DETAILED ANALYSIS OF SB 677

Classifying rail stops according to the applicability of SB 79/677 is a two-step process, as detailed below. Note that this analysis only applies to rail stops in urban transit counties, which are those counties currently “with more than 15 passenger rail stations.”

STEP 1: Classify rail service at each stop

The pertinent sections of SB 677, arranged in decision order, are [changes highlighted]:

(h) “Light rail transit” includes streetcar, trolley, and tramway service. “Light rail transit” does not include airport people movers.

(d) “Heavy rail transit” means a public electric railway line with the capacity for a heavy volume of traffic using high-speed and rapid acceleration passenger rail cars operating singly or in multicar trains on fixed rails, separate rights-of-way from which all other vehicular and foot traffic are excluded, and high platform loading. “Heavy rail transit” does not include California High-Speed Rail.

(b) “Commuter rail” means a public rail transit rail service not meeting the standards for heavy rail or light rail, excluding California High-Speed Rail and Amtrak Long Distance Service.

(k) “Rail transit” has the same meaning as defined in Section 99602 of the Public Utilities Code.

According to the above rules, rail service is classified as follows:

IF the service is a streetcar, trolley, or tramway, but not airport people mover,

THEN the service is light rail.

ELSE IF the service is an electric-powered train with high-speed and rapid acceleration, but not California High Speed Rail,

THEN the service is heavy rail. This has been interpreted as BART and a couple of LA Metrorail lines. (Putting this test after the light rail determination fixes the problem that “high-speed” and “rapid acceleration” are undefined terms in the bill text and instead rely on accepted transit industry practice.) Diesel-powered trains, such as the Coaster, Sprinter, and Metrolink do not meet the requirement of “electric railway line” and hence fall into the next category of “commuter rail.”

ELSE IF not light rail, heavy rail, California High Speed Rail, or Amtrak Long Distance Service,

THEN the service is commuter rail. Presumably, Amtrak Long Distance Service are those Amtrak lines that go to other states, such as Coast Starlight, California Zephyr, Southwest Chief, and Sunset Limited, whereas the Capitol Corridor, Gold Runner, and Pacific Surfliner Amtrak services would be considered commuter rail lines.

Note that SB 677 changes (b) from "rail transit" to "transit rail", which means that (b) no longer strictly defines (k). This is probably because "rail transit" is defined in PRC 99602 as "a rail mass transportation operation usually within an urban area, generally characterized by more frequent service over shorter distances than normally provided by commuter rail service or intercity rail service, and operating on a rail line without any or with very limited rail freight service." It would appear that this was a necessary (even valid clarifying) change given the muddling of "commuter rail service" and "intercity rail service."

STEP 2: Determine whether a station meets SB 79/677 requirements and at which density tier

The second step of SB 79/677 is to determine whether a station meets the eligibility criteria for Tier 1 or Tier 2:

(e) "High-frequency commuter rail" means a **public** commuter **rail service operating or intercity rail station with** a total of at least 48 **passenger** trains **on average per day weekday** across **both all** directions, not including temporary service changes of less than one month or unplanned disruptions, and not meeting the standard for very high frequency commuter rail, at any point in the past three years.

(r) "Very high frequency commuter rail" means a commuter rail **service** with a total of at least 72 trains per day across both directions, not including temporary service changes of less than one month or unplanned disruptions, at any point in the past three years.

(n) "Tier 1 transit-oriented development stop" means a transit-oriented development stop within an urban transit county served by heavy rail transit or very high frequency commuter rail.

(o) "Tier 2 transit-oriented development stop" means a transit-oriented development stop within an urban transit county, excluding a Tier 1 transit-oriented development stop, served by light rail transit, by high-frequency commuter rail, or by bus service meeting the standards of paragraph (1) of subdivision (a) of Section 21060.2 of the Public Resources Code.

The material change to (e) isn't really that it introduces "intercity rail" (i.e., Amtrak), because it could be argued that the language of SB 79 already included intercity (but not "long distance") Amtrak services in the definition of "commuter rail" as explained in Step 1.

The big change in SB 677 is that it changes (e) from "commuter rail service" to "commuter rail station." In the case of stations that are served by multiple train lines, the original (SB 79) definition required that at least one of the lines meet the 48 train threshold by itself, whereas the SB 677 definition now adds the services together. SB 677 also accounted for multiple lines diverging from a station by changing "both directions" to "all directions."

This change is why Solana Beach, for example, would now qualify as Tier 2 - neither the Coaster (25 trains per day) nor the Pacific Surfliner (24 trains per day) exceed the SB 79 Tier 2 threshold of 48 trains per day, but the combination of the two (49 trains) does.

Note that SB 677 does not change the standard for *very high frequency commuter rail*.

It also seems clear as the bills are written that under both SB 79 and SB 677, light rail trains are not to be combined with commuter rail trains to determine Tier 1 stops.

The above analysis is summarized on the next page (Table 1).

Table 1. SB 79 Rail Classifications and SB 677 Scope Changes

Service Type	Examples	Counted Towards Urban Transit County?	SB 79 determination of station eligibility and density Tier (1 or 2)	SB 677 Change
<u>Light Rail</u> (Trolley, Streetcar, Tramway)	SD Trolley OC Streetcar	YES	Tier 2 regardless of service level	No change
<u>Heavy Rail</u> (High-volume electric)	BART Metrorail	YES	Tier 1 regardless of service level	No change
<u>Commuter Rail</u> (Remaining passenger rail service that isn't heavy or light rail, CA high speed or Amtrak Long Distance.) SB 79/677 definition of commuter rail includes what is sometimes separately classified as intercity rail.	<u>Regional:</u> Coaster Metrolink Sprinter <u>Amtrak:</u> Capitol Corridor Gold Runner Pacific Surfliner	YES	Tier 1 if 72 or more commuter trains daily for a single line Tier 2 if 48 or more commuter trains daily for a single line	Applies the Tier 2 threshold to the aggregate of Commuter Rail services rather than the rail line with the greatest number of trains. Reduces the level of service requirement from average daily trains to average weekday trains. As written, Tier 1 threshold still applies to the maximum single line daily service. (Tier 2 changes are not applied to Tier 1.)
<u>Amtrak Long Distance Service</u>	California Zephyr Coast Starlight Southwest Chief Sunset Limited Texas Eagle	YES	Excluded	No change
<u>California High-Speed Rail</u>		YES	Excluded	No change
<u>Freight</u>		NO	Excluded	No change

CONCLUSION - Impact of SB 677

For this report, Neighbors For A Better San Diego examined just those stations in California that are served by Amtrak to determine the impact of combining the number of stops for Amtrak services (excluding Long Distance Services) with other regional commuter rail services, such as Metrolink, Coaster, Sprinter, Caltrain, SacRT, and others. The impact of SB 677 for just those stations that include Amtrak service are:

- There are many stations (Burbank - 3 stations, Glendale, Santa Clara - 2 stations, and Solana Beach) that are not currently eligible for SB 79, but would become eligible as Tier 2 stations due to combining rail services under SB 677.
- There are multiple stations (Burbank Airport, Glendale, Oceanside, Sacramento, San Diego Old Town, and San Diego Downtown) that could get further upzoned to Tier 1 if *very high frequency commuter rail* is improperly interpreted as the combination of services and not the single highest frequency service as written in SB 79 and (currently) SB 677. (Note that the scope changes to *very high frequency commuter rail* that were put in the January 5 draft were reverted back to the adopted SB 79 language in the current January 8 bill draft.)
- When Orange County becomes an urban transit county later this year, there are four stops (Anaheim, Fullerton, Irvine, and Santa Ana) that will become Tier 2 stops due to combining rail services. These would not become eligible under the current wording of SB 79.

Again, further work remains to look across all Metrolink and other California commuter rail stations that serve multiple lines to see which ones will be made eligible under SB 677.

Given that these are scope changes and not technical clarifications, SB 677 would impose unwieldy requirements on cities that would have one set of stations and density tiers for the fast-approaching July 1, 2026, SB 79 deadline and another set of requirements for the January 1, 2027, SB 677 deadline.