CITY OF BURBANK
COMMUNITY DEVELOPMENT DEPARTMENT
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January 30, 2026

Mr. Ray Sosa, Chief Planning Officer
Mr. Timothy Lindholm, Chief Program Management Officer
Metropolitan Transportation Authority
Attn: North Hollywood to Pasadena Bus Rapid Transit Corridor Project
One Gateway Plaza
Los Angeles, CA 90012

RE: Senate Bill 79 Subsequent Environmental Review for the Metro North Hollywood to Pasadena Bus Rapid Transit Corridor Project

Dear Mr. Sosa and Mr. Lindholm:

The City of Burbank (Burbank) is reviewing 100% plans for the Metropolitan Transportation Authority (Metro) North Hollywood to Pasadena Bus Rapid Transit Corridor Project (BRT) and believes that Senate Bill 79's (SB 79) mandatory upzoning constitutes new information that changes the circumstances under which the BRT was proposed and renders its Final Environmental Impact Report (EIR) legally inadequate. Burbank respectfully requests Metro conduct subsequent environmental review under the California Environmental Quality Act (CEQA) to analyze, publicly disclose and mitigate potential significant environmental impacts of any BRT stations that qualify for SB 79 density increases.

Metro's Draft and Final EIR's for BRT were considered by Burbank on December 8, 2020, and April 12, 2022, respectively. On March 26, 2024, Burbank's City Council approved a Cooperative Agreement with Metro for Design and Construction of the BRT. The BRT EIR determined the Project would have a less-than-significant Land Use and Planning Impact because it was limited to operating entirely within existing transportation corridors and would not impact land uses.[1] In other words, the EIR assumed the BRT would not implicate or require increases in building height, density, and floor area ratios for future development that could conflict with a land use plan, policy or regulation of any agency with jurisdiction over the Project. SB 79 changed that fundamental assumption.

SB 79 was signed on October 10, 2025, and is generally effective July 1, 2026. The law requires housing development projects proposed within one-half mile of qualifying transit-oriented development stops

[1] Metropolitan Transportation Authority, Draft Environmental Impact Report: North Hollywood to Pasadena Bus Rapid Transit Corridor Project (SCH# 2019060110), October 2020, Ch. 4, p. 4-14

be allowed at substantially higher densities than permitted under Burbank's General Plan (including the 2021-2029 Housing Element), zoning code and proposed specific plans, including in single-family residential zones. Burbank's permitted multifamily residential housing densities range from 0 to 43 units per acre in residential zones and between 20 and 87 units per acre in commercial and other non-residential zones. SB 79 would permit approximately 140 units per acre adjacent to qualifying transit stations and 80 to 100 units per acre in zones within one-half mile from those stations, which include single-family residential.

As Burbank evaluated Metro's BRT Draft and Final EIRs, it approved its 6th Cycle Housing Element, which demonstrated zoning capacity for more than 10,000 additional housing units, and commenced several specific plans to, among other things, identify appropriate zoning and development incentives to accommodate up to 26,836 additional housing units in the next 10 years. The CEQA analysis for the Housing Element and several specific plans conclude significant and unavoidable impacts to Burbank's sewage conveyance and treatment system and find electricity demand from future housing growth will similarly require a substantial increase in Burbank's power system interconnection capacity. Adding substantially more residential density around SB 79-qualifying transit-oriented development stops, not previously studied under CEQA, will exacerbate these impacts.

The BRT project description in the Draft and Final EIRs circulated and approved by the Metro Board of Directors on April 28, 2022, was limited to operating a bus rapid transit service and stations in existing transportation corridors and did not include any residential transit-oriented development. SB 79 and its imposition of higher residential densities around BRT stations presents substantial new information that could not have been known, which is of substantial importance to the project, and will have significant and unavoidable impacts to Burbank's infrastructure that have not been analyzed or considered.

Therefore, Burbank formally requests Metro, the lead agency for BRT, commence subsequent environmental review to determine potentially significant environmental impacts around any SB 79 "transit-oriented development stops" located within the City.

Sincerely,

Patrick Prescott
Community Development Director

Cc: Justin Hess, City Manager
Joseph McDougall, City Attorney
Burbank City Council