



COMMUNITY DEVELOPMENT

February 17, 2026

SENT VIA ELECTRONIC MAIL

Mr. Anthony DeFrenza, Project Manager
Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012

Re: City of Burbank Review of the North Hollywood to Pasadena Bus Rapid Transit Corridor Project (BRT) 100 Percent Plans

Dear Mr. DeFrenza:

The City of Burbank has completed reviewing 100 percent plans for the Metropolitan Transportation Authority (Metro) North Hollywood to Pasadena Bus Rapid Transit Corridor (BRT) Project and has delivered comments to Metro on Tuesday, February 17, 2026 as agreed under the terms set by the Cooperative Agreement. The City's comments are being made for project plans that include bus lanes on a portion of the alignment within the City.

As discussed in the City's letter to Metro on January 30, 2026, the City believes that Senate Bill 79's (SB 79) mandatory upzoning constitutes new information that changes the circumstances under which the BRT project was proposed and renders its Final Environmental Impact Report (EIR) legally inadequate. 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.

As a Responsible Agency for the Project under the California Environmental Quality Act (CEQA), Burbank cannot issue a construction permit for the BRT Project until Metro conducts subsequent environmental review to analyze, publicly disclose and mitigate potential significant environmental impacts of any BRT stations that qualify for SB 79 density increases as a "transit-oriented development stop."

Public Resources Code Section 65912.156(p) defines a transit-oriented development stop as a "major transit stop, as defined by Section 21064.3 of the Public Resources Code, and also including stops on a route for which a preferred alternative has been selected or which are identified in a regional transportation improvement program, that is served by...bus service within an urban transit county meeting the standards of paragraph (1) of subdivision (a) of Section 21060.2 of the Public Resources Code." Under this definition, the City believes the BRT Project constructed with no bus lanes will not trigger SB 79 and thus, would not require subsequent environmental review. If the state definitions change or new information becomes available, suggesting SB 79 will apply to bus stops served by mixed-flow bus lanes, the City's position will likewise be that subsequent CEQA review is required for the BRT Project with mixed-flow lanes.

In addition, in 2022 as part of its review of the EIR, the City Council adopted a position that the BRT Project shall be implemented with mixed-flow operations on Olive Avenue between Buena Vista Street and Lake Street. Metro's 100 percent plans show dedicated bus lanes on this segment. Aside from City's inability to issue a permit due to SB 79, the City also cannot issue a construction permit for the project because bus lanes are still shown on this segment. The City's request for mixed-flow on this segment of Olive Avenue has been previously communicated to Metro at the 60 and 85 percent plan level, as well as through various coordination meetings between the two agencies.

In conclusion, the City has delivered comments on Metro's 100 percent plans as required by the Cooperative Agreement but cannot issue a construction permit for the BRT Project based on the approval of SB 79. In order for the City to consider issuing a permit, Metro must either conduct subsequent environmental review or remove all bus lanes from the BRT Project plans.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. Kriske", is written over a light blue horizontal line.

David Kriske
Assistant Community Development Director, Transportation

Cc: Patrick Prescott, Community Development Director
Damian Skinner, Public Works Director
Lifan Xu, Chief Assistant Public Works Director- City Engineer
Fred Ramirez, Assistant Community Development Director