



COMMUNITY DEVELOPMENT

March 3, 2026

Mr. Kome Ajise, Executive Director
Southern California Association of Governments
900 Wilshire Boulevard, Suite 1700
Los Angeles, CA 90017

Re: SB 79 Transit-Oriented Development Stop Designations and CEQA Obligations

Dear Mr. Ajise:

The City of Burbank is providing input regarding SCAG's responsibilities under Senate Bill 79 (SB 79) to identify Transit-Oriented Development (TOD) stops around which increased residential development capacity must be permitted.

SB 79 vests SCAG with the responsibility to identify qualifying transit stops and to prepare corresponding TOD maps that will trigger mandatory increases in residential development capacity within specified radii. Given the significant land use, infrastructure, and environmental implications of these designations, the City requests SCAG identify TOD stops for the unbuilt Bus Rapid Transit (BRT) projects in a manner that is consistent with both SB 79 and the California Environmental Quality Act, prior to publishing the TOD maps required under SB 79.

Inability for SCAG to Apply SB 79 TOD Stop Criteria to Unbuilt BRT Transit Projects

The application of the criteria identified in SB 79 for designating TOD stops around unconstructed BRT projects is unclear. This is because the level of project detail needed to apply SB 79 TOD stop criteria for BRT projects is not included in the Regional Transportation Plan's project descriptions and is often not even included in the project description adopted by its lead agency.

In the case of the Metro North Hollywood to Pasadena BRT Project, neither the SCAG Connect SoCal 2020, SCAG Connect SoCal 2024, Metro Long Range Transportation Plan, nor Metro Short Range Transportation Improvement Program, provide the granular, project-level characteristics necessary to confirm whether stops along the project alignment are TOD stops under SB 79. Specifically, SB 79 requires detailed description and limits of a BRT project's full-time dedicated lanes, or locations where BRT projects operate in exclusive right-of-way. The law also requires knowledge of peak service frequencies. None of these project characteristics are known at a project's conceptual or design phase. Furthermore, in the case of the Metro North Hollywood to Pasadena BRT Project, as of the date of this letter these important details are still being determined as

part of the design process, and may further change between now and the July 1, 2026 deadline for SCAG to identify TOD stops for the project. The City does not believe that SCAG can identify TOD stops along the Metro North Hollywood to Pasadena BRT Corridor project in accordance with the criteria established in SB 79.

Identifying SB 79 TOD Stops is a Project Subject to CEQA Review

The City of Burbank's adopted Housing Element and associated specific plan environmental reviews already identify and evaluate the impacts of projected housing growth consistent with our Regional Housing Needs Allocation (RHNA). Those analyses disclose significant and unavoidable impacts in certain resource areas, even under locally planned growth scenarios.

If SB 79 TOD designations require additional residential density beyond what was assumed and evaluated in those CEQA documents, the resulting development intensity will exacerbate identified impacts, including but not limited to land use, transportation, infrastructure capacity, public services, and utilities.

Creating SB 79 TOD stop maps would function as a regulatory trigger requiring increased residential development capacity, therefore SCAG's designation of these TOD stops constitutes a discretionary action with reasonably foreseeable environmental consequences. Accordingly, SCAG must conduct appropriate CEQA review of the land use intensification resulting from SB 79 designations prior to adoption of any TOD stop maps. Because the Connect SoCal 2024 Plan includes similar transit maps that have development implications under other state laws, the City recommends that creation of the SB 79 maps be conducted as part of a formal amendment to the Connect SoCal Plan, which would be subject to CEQA review and include opportunities for public comment.

City of Burbank Request

Given the above, the City of Burbank respectfully requests that SCAG:

1. Not designate SB 79 TOD stops for the Metro North Hollywood to Pasadena BRT Corridor Project until the project has been permitted for construction, because project design elements necessary to apply SB 79 criteria are not known until that time.
2. Conduct comprehensive CEQA review that evaluates the environmental impacts associated with the increased residential densities required by SB 79 TOD stop designation prior to map adoption, potentially via an amendment to Connect SoCal 2024 that would be reviewed under CEQA and approved by the SCAG Regional Council.
3. Provide affected jurisdictions an opportunity to review and comment on both the eligibility determinations and the associated environmental analysis.

The City of Burbank remains committed to meeting its housing obligations and advancing sustainable, transit-supportive growth. However, implementation of SB 79 must occur in a manner that is legally sound, environmentally responsible, and transparent to local jurisdictions that will bear the primary responsibility for infrastructure, public safety, and community impacts.

We look forward to continued coordination with SCAG staff on this matter and appreciate your attention to these important concerns.

Sincerely,



Patrick Prescott
Community Development Director
City of Burbank

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

Sara Jepson, Chief Planning Officer, SCAG