

May 23, 2022

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Honorable Mayor and Members of the City Council,

CITY CLERK  
CITY OF PASADENA

I am writing this letter to oppose the Zoning Code Amendment for Religious Facilities with Affordable Housing as proposed. The staff report is only presenting a framework for which the ordinance which will be written later and brought back to the Council for approval. The Planning Commission or community will not have the opportunity to review the draft ordinance prior to its first reading. The following are a list of concerns:

**Public Notices** – Text amendments which affect the whole city are published in newspapers, however, this amendment is not only a text amendment but constitutes map amendments by overriding existing zoning designations. Due to the size of the proposed units 75 units by right per site, property owners that live adjacent or across the street from a church will be affected by these developments. The Commission only heard comments from groups that are proponents of this ordinance. There was no staff outreach to neighborhood associations. In addition, community participation is one of the eight Guiding Principles of the General Plan. This represents a due process issue.

**Predevelopment Plan Review** – If a project is 50 units or greater will the applicant be required to go through PPR and reviewed by the City Council prior to formal application as required by the zoning code?

**Review Process** - The proposed zoning designation for this development within this ordinance is 32 du/acre and up to 75 units per site by right. Will an applicant be permitted to apply for a density bonus? If an applicant requests more than 75 units a minor CUP will be required with a staff report going to the Hearing Officer with no public notice to the affected adjacent property owners.

As proposed the Design Commission is the only reviewing body for projects submitted on church property. Projects before the Design Commission are not publicly noticed.

If an applicant applies for affordable housing concessions, as suggested in a letter from Bill Burns, asking for all five concessions, will the applicant be required as per code to be reviewed by the Hearing Officer? Same question applies if the applicant wishes to submit for a waiver of development standards which would supersede FAR, height and setbacks. Would a variance be required?

**Development Standards** - The 32 du/acre requires a minimum of a 10,000 square foot lot, and a reduction in number of units based on lot square footage. Will this amendment override the zoning code and allow for 32 du/acre whatever the size of the lot?

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In the PS zones, which have no development standards, the development standards of the least restrictive abutting zone, including across the street, would apply. Therefore, if a proposed project is zoned RM-16 but across the street is RM-32, then RM-32 would prevail. Would this not require a zoning map amendment?

**Mixed Use Development Standards** - Mixed Use standards are recommended because of the constraints of building on church property with an existing building. If a church has a vacant lot contiguous to the main church which is solely used for parking can the City of Garden Standards be applied especially if the church is adjacent to RS or RM-12 zoning districts.

Development Standards for “Existing Use Permits” and Development Standards” conflict. Unclear as to the different approaches.

**Addendum to the 2015 General Plan EIR** – An addendum (paid for by the City) was prepared for this project which included comments that there are 15 potential church sites that do not permit church housing and references the 75 units by right. The EIR does not identify those 15 sites nor their zoning. Attachment E lists zoning Districts that would allow religious facilities, however many of those districts already provide for the development of housing. Identifying those sites would require the public to be familiar with the zoning code to determine which changes are allowed. How can an Addendum to the 2015 General Plan EIR be prepared when the ordinance itself is not yet written?

**Specific Plans** – The East Pasadena, North Lake and Fair Oaks Orange Grove Specific Plans have not been reviewed by the community nor the Planning Commission. The church ordinance is pre-empting the Specific Plan process. By allowing housing on church properties without any discussion for context of surrounding land is consistent with spot zoning practices.

**Special Privilege** – By approving this ordinance at this time appears to be a case of special privilege for churches.

There is no question that the City of Pasadena needs more affordable housing. Using underutilized church property may be one alternative of many, to addressing this issue. However, as proposed there are still many questions that need to be addressed, and which most likely be addressed in the ordinance presented to the City Council. But at that point there will be little opportunity for the community or any commission to voice their comments and concerns to the creation of new laws that make a multiple family, 3-4 or 5 story projects by right use.

Sincerely,

Carol Hunt Hernandez

Planning Commissioner

AICP, Retired

## McMillan, Acquanette (Netta)

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**From:** Andrew Mark  
**Sent:** Monday, May 23, 2022 3:35 PM  
**To:** PublicComment-AutoResponse  
**Cc:** Wilson, Andy; Rivas, Jessica; Madison, Steve; fewwilliams@gmail.com; Masuda, Gene; Kennedy, John J.; tyron@tyronhampton.com; Gordo, Victor; Reyes, David  
**Subject:** Rezoning Congregational Land for Affordable Housing

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Dear Mayor and City Council members,

I am a Pastor and renter living in **District 6 of Pasadena**. My family and I moved to Pasadena just this last December and have been grateful for the opportunity to live in such a wonderful city. That said, finding a place to live here was incredibly difficult and rent is shockingly high. At this point over 45% of our income goes to paying rent. Still, we are managing to make it through. Others are not so fortunate. Especially, our sisters and brothers of color and other marginalized communities.

As a Pastor at a local church (Pasadena Covenant Church) I am excited about the proposal to rezone congregational land for affordable housing. I am writing in support of this innovative and much needed zone change. Churches can and should be encouraged through policy to defend and support the vulnerable communities around them!

That said, there are some excellent aspects of the proposed policy, but other aspects that need to be changed to make it work. **Please increase the zoning to just four more units per acre and use the development standards that accompany a 32 dwelling unit per acre zoning designation.**

Thank you for taking the time to read this. Excited to be working together for the good of our new home and our new neighbors.

Grateful,

Andrew Mark  
Pastor for Families and Community  
[PasCov.org](http://PasCov.org)  
[amark@pascov.org](mailto:amark@pascov.org)

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## McMillan, Acquanette (Netta)

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**From:** Esprit Jones  
**Sent:** Monday, May 23, 2022 3:58 PM  
**To:** PublicComment-AutoResponse  
**Subject:** Agenda item 18 - ZONING CODE AMENDMENT – RELIGIOUS FACILITIES WITH AFFORDABLE HOUSING

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Dear Mayor Gordo and City Councilmembers,

I attend Pasadena Foursquare Church.

I support the proposal to rezone religious land in Pasadena for affordable housing. This rezoning needs to be "by right", so not to exclude in racist and classist manners that have built this city to where we stand now.

As specific demographics, especially Black and Latinx in already marginalized communities, are increasingly unable to keep up with cost of living, many have been displaced. With the gaps in housing, our school district's enrollment numbers continue to drop and community schools face losing staff members as well as students.

Because of need, Pasadena has been mandated by the state of California through the Regional Housing Needs Assessment (RHNA) to build 5,900 affordable housing units over the next 8 years. More sites are needed to meet this goal, religious lands increases the number of sites available.

Ten community churches have expressed interest in participation. Ten church sites could provide over 1,000 units towards the RHNA target. One church has already chose an affordable housing developer to build 52 units, however, zoning changes would need to occur in order to move forward.

Most churches are either not zoned for residential housing or not zoned at a high enough density to make an affordable housing development financially feasible. Making Housing and Community Happen (MHCH) has laid out the details in their letter to Council. MHCH has also submitted a proposal to carefully review each church site and proposes a density limit that makes sense considering the direct surroundings.

Rezoning for religious land provides a profound opportunity to reshape our city.

Regards,  
Esprit Loren Jones

His purpose is greater than natural interpretation allows.

~ da poetess spreeway

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## McMillan, Acquanette (Netta)

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**From:** Sandy Schaupp  
**Sent:** Monday, May 23, 2022 4:00 PM  
**To:** PublicComment-AutoResponse  
**Subject:** Support for proposal to rezone congregational land

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Dear Mayor and City Council members,

Thank you for considering the proposal to rezone congregational land for affordable housing. I am writing in support of this innovative and much needed zone change.

Thank you Mayor Gordo for appointing a Housing Task Force and expressing concern for affordable housing.

Thank you to the Council for unanimously supporting affordable housing at Heritage Square South and the Civic Center.

I attend The Church We Hope For in Pasadena and have friends who have had to move out of Pasadena due to rising costs. Also, as a Christian I have a deep conviction that we need to help homeless human beings have a safe and sustainable living situation.

I know you care about affordable housing, so I urge you to adopt a zoning policy that will work to allow congregations to have affordable housing built on their underutilized land. There are 10 churches ready to do this!

The staff recommends zone changes only for commercial and public/semi-public zones, which excludes most congregations in our city. Please make sure that you pass an ordinance that works by increasing the number of units per acre from 32 to 36, only four additional units.

I support rezoning congregational land because churches are ideal sites for affordable housing. There are many congregations already involved in helping homeless and low-income individuals with food, clothing, and other services. Some of these congregations have large parking lots that are underutilized during the week. Let's give congregations a chance to bless our community not only with food, but also with much needed affordable housing so we can continue to see our homeless count drop.

Thank you for considering this request,

Sincerely,  
Sandy Lee Schaupp

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Sent from my iPhone

5/20/22



Hello Mayor & City Council,



✦ My name is Zionne Lee, and I ~~have~~ lived in Pasadena for 2 years. I also have attended Pasadena Foursquare for over 4 years.



I absolutely loved living in Pasadena although had to move to Alhambra because it was much more affordable & spacious. I see myself moving back to Pasadena as soon as possible because I still participate in lots of community events in Pasadena.



We need affordable housing in Pasadena because of the rise of homelessness as well as overcrowding in apartments. Over 10 churches have agreed to build affordable housing if zoning can permit it.



THANK YOU FOR YOUR COMMITMENT

♥ TO HOUSING JUSTICE ♥


♥ always

Zionne Lee






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PASADENA   
CITY COUNCIL

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## McMillan, Acquanette (Netta)

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**From:** Bin Lee  
**Sent:** Monday, May 23, 2022 4:13 PM  
**To:** PublicComment-AutoResponse  
**Subject:** Agenda Item #18 - Congregational Land

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Dear Mayor and City Council members,

Thank you for considering the proposal to rezone congregational land for affordable housing. I am writing in support of this innovative and much needed zone change.

I urge you to adopt this policy because it has broad public support. 95% of churches surveyed by MHCH support a Congregational Land Zoning amendment. The Clergy Community Coalition, which comprises 76 congregations, supports this zoning amendment, as does the Interdenominational Ministerial Alliance and the Pasadena Affordable Housing Coalition. When the Planning Department held a public zoom meeting on rezoning congregational land for affordable housing, only one person was not in support, among the hundred in attendance. Please listen to the voice of your constituents!

This is a great opportunity to protect our fellow families, friends, and neighbors and give Pasadena another tool to provide affordable housing in our city.

Thanks for your time,  
Bin Lee  
District 1 resident and homeowner

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## McMillan, Acquanette (Netta)

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**From:** Alli Burnison  
**Sent:** Monday, May 23, 2022 4:20 PM  
**To:** PublicComment-AutoResponse  
**Subject:** Rezone Religious Land for Affordable Housing

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Dear Mayor and City Council

I support the proposal to rezone religious land in Pasadena for affordable housing. There are ways that this zoning amendment can be written that will assure that it will work and actually produce affordable housing, and there are ways that it can be written that will assure that it will not work. For example, if the amendment allows for sufficient density at each site, then projects will be financially feasible, and the zoning amendment will work. But if it does not allow enough density at each site, then projects won't be financially feasible, and the zoning amendment will be virtually useless. There are other factors, such as the process of approval for each project, that will have bearing on whether the zoning amendment will work or not. Making Housing and Community Happen (MHCH) has addressed these factors in their letter, so

I recommend that the council seriously consider what MHCH has proposed.

We desperately need more affordable housing in Pasadena. Please pass a zoning amendment that works to create more affordable housing.

Thank you.  
Alli

**Alli Burnison**  
**Peace Catalyst International**  
Los Angeles, CA  
228-365-1111



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Dear Mayor and City Council:

I attend Pasadena Foursquare Church and own a condo in Pasadena with my husband.

Due to our daughter and her family not being able to find affordable housing in Pasadena and what I have seen in our own condo complex, I support the proposal to rezone religious land in Pasadena for affordable housing.

Since being on the HOA Board of my condo complex, I have noticed a consistent overturn of rental residents. This begins when an owner who cannot afford to stay in their unit, sells it cheaply to a person who flips the unit for more money who then rents it out at an outrageous price. Due to this, people who cannot afford to stay move out and there becomes a revolving door. As a result, the absence of these families with small and elementary aged children causes the City of Pasadena and Pasadena Schools to suffer.

We have also had homeless people relieve themselves in the bushes around our property. As a result, some owners sold their units because they did not feel safe when they went out for walks.

I believe affordable housing on church land can be one way to solve the problem so families can find homes to raise their children and invest themselves into Pasadena and the schools.

Thank you for your attention to this matter.

Lori Holloway

## McMillan, Acquanette (Netta)

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**From:** carl selkin  
**Sent:** Monday, May 23, 2022 4:27 PM  
**To:** PublicComment-AutoResponse  
**Subject:** Agenda (5.23.2022) item 18 Zoning Church Land For Housing

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**To:** Mayor Gordo and members of the Pasadena City Council  
**Subject:** Revision to zoning restrictions of housing on church land  
**Date:** May 23, 2022

The Social Justice Committee of Pasadena Jewish Temple and Center supports the revision of Pasadena zoning ordinances to facilitate by-right development of affordable housing on the underutilized property of area churches. While this zoning change would not apply to PJTC, we recognize the unacceptable shortfall in housing for those who require affordable and supportive housing. Pasadena non-profits have been at the forefront of advocating for housing to relieve the dire situations of the houseless and the at-risk, and many churches have stepped up with their available land to meet the need in a city where such property ready for this kind of development is in such short supply.

We know that for developers to take this opportunity to address our city's need, there must be the guarantees of by-right development, adequate density to ensure economic viability, and the guarantee that these developments will be well-managed and maintained for the long haul, a requirement that can best be insured by the integrity of houses of worship and their non-profit partners.

We urge speedy passage with full consideration and approval of the recommendations of Making Housing and Community Happen.

Carl Selkin

Pasadena resident, District 5

Co-Chair Social Justice Committee of Pasadena Jewish Temple and Center

Respectfully Submitted for the Social Justice Committee of Pasadena Jewish Temple and Center

Sent from [Mail](#) for Windows

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## McMillan, Acquanette (Netta)

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**From:** Robles, Sandra  
**Sent:** Monday, May 23, 2022 4:30 PM  
**To:** Iraheta, Alba; McMillan, Acquanette (Netta)  
**Cc:** Flores, Valerie; Jomsky, Mark  
**Subject:** FW: May 23rd City Council Agenda Item#18 -- Religious Housing -- Commissioner DELGADO Comment Letter

Hi netta,

Please print and distribute

Hi Alba,

Please post

**Sandra S. Robles**, Assistant City Clerk | Office of the City Clerk  
D 626.744.7398 E [sarobles@cityofpasadena.net](mailto:sarobles@cityofpasadena.net)  
100 N. GARFIELD AVENUE | PO BOX 7115 | PASADENA, CA 91109-7215



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**From:** Reyes, David <[davidreyes@cityofpasadena.net](mailto:davidreyes@cityofpasadena.net)>  
**Sent:** Monday, May 23, 2022 4:19 PM  
**To:** Official Records - City Clerk <[OfficialRecords-CityClerk@cityofpasadena.net](mailto:OfficialRecords-CityClerk@cityofpasadena.net)>  
**Cc:** Jomsky, Mark <[mjomsky@cityofpasadena.net](mailto:mjomsky@cityofpasadena.net)>; Robles, Sandra <[sarobles@cityofpasadena.net](mailto:sarobles@cityofpasadena.net)>; Kurtz, Cynthia <[ckurtz@cityofpasadena.net](mailto:ckurtz@cityofpasadena.net)>; Paige, Jennifer <[jpaige@cityofpasadena.net](mailto:jpaige@cityofpasadena.net)>  
**Subject:** FW: May 23rd City Council Agenda Item#18 -- Religious Housing -- Commissioner DELGADO Comment Letter

Please provide to the City Council

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**From:** Reyes, David  
**Sent:** Monday, May 23, 2022 2:05 PM  
**To:** Williams, Felicia <[fwilliams@cityofpasadena.net](mailto:fwilliams@cityofpasadena.net)>; Gordo, Victor <[vgordo@cityofpasadena.net](mailto:vgordo@cityofpasadena.net)>; Kurtz, Cynthia <[ckurtz@cityofpasadena.net](mailto:ckurtz@cityofpasadena.net)>  
**Cc:** De La Cuba, Vannia <[VDeLaCuba@cityofpasadena.net](mailto:VDeLaCuba@cityofpasadena.net)>; Bagneris, Michele <[mbagneris@cityofpasadena.net](mailto:mbagneris@cityofpasadena.net)>; Paige, Jennifer <[jpaige@cityofpasadena.net](mailto:jpaige@cityofpasadena.net)>  
**Subject:** RE: May 23rd City Council Agenda Item#18 -- Religious Housing -- Commissioner DELGADO Comment Letter

Dear all,  
Please see below for responses to questions. Thank you.

### **CM Felicia Williams (Part 1)**

What is the SBDL bonus for an 80% affordable housing project?

- The proposed ordinance would require that proposed housing projects consist of 80% affordable units, which would allow a 50% density bonus. Projects would need to exceed the affordability requirement

and provide a 100% affordable project (including density bonus units) in order to exceed the 50% and get the "super" density bonus of AB 1763.

Verify these regulations only apply to ~9 sites identified in EIR addendum Figure 2

- These regulations apply to ~9 sites that do not currently allow housing today, as well as sites where housing may be allowed but existing regulations are a barrier to development of affordable housing in conjunction with a religious facility.

Verify these regulations wouldn't supersede any existing RM zoning designations (e.g. church currently zoned RM-32)

- Correct. If a religious institution was located in RM-32 then the existing zoning requirements would apply. These regulations are focused on commercial and PS zones in the City.

What are the specific development standards for projects abutting SF districts? How would these be developed?

- The applicable development standards would be those of the least restrictive abutting zone. If the least restrictive abutting zone is an RS zone, then standards such as maximum height (28' if site less than 75 feet wide, and 32' if site 75 feet wide or larger) and required setbacks (blockface avg. but not less than 25 feet in the front yard, 10% of lot width in side yard, and 25 feet in rear yard) would be governed by the RS zone standards. Additionally, the zoning code includes an encroachment plane requirement for commercially-zoned property that is adjacent to RS and RM-12 zoned property. These regulations would apply that encroachment plane to PS zones adjacent to RS/RM-12 zones as well.

How many potential sites are located in historic/landmark districts?

- There are no eligible sites known to be in a landmark district. There are a number of religious institutions within National Register historic districts such as the Pasadena Civic Center district and Pasadena Playhouse district, however such districts are in zones that currently allow housing. Any religious facility housing proposal located in a historic/landmark district would be subject to review by the Design & Historic Preservation section for compliance with the City's Historic Preservation Ordinance and the Secretary of the Interior's Standards.

Would churches with schools/day care be exempt due to similar daily activity of public school sites that have been exempted?

- These regulations would apply to religious institutions in the City. Religious institutions with schools/day care would be eligible under the proposed amendment, as long as the primary use of those sites is a religious facility.

### **CM Felicia Williams (Part 2)**

- **Protection of Historic/Landmark Districts** - After our win on SB9 (yes, I am calling it a WIN!!) this proposal could potentially harm our landmark/historic districts and resources that we just fought to protect. Clearer protections along with a list of eligible resources (forthcoming with the citywide historic survey) are needed.
  - **Page 5 of the staff report states that** *"Development proposed on any site containing a designated historic resource, a site with an eligible historic resource, or a noncontributing site located within a designated historic or landmark district shall be subject to all applicable regulations within the City's Historic Preservation Ordinance and the Secretary of the Interior's Standards and subject to review as determined by Design & Historic Preservation staff."*
  - **There are no known religious institution sites within landmark districts that would be subject to these regulations. There are some religious institutions located in National Register Historic Districts (such as those found in the Central District) however those are in zones that currently allow housing. As stated above, any religious institution proposing housing within a landmark/historic district would be subject to compliance with the Historic Preservation Ordinance and the Secretary of the Interior's Standards, as well as review by Design & Historic Preservation staff.**
- **State Density Bonus Law Makes Projects Less Affordable** - Staff report needs to analyze impact of SBDL on (1) total density (if we approve staff rec of 32 du/acre are we effectively approving 58 du/acre with density bonus?); and (2) affordability of bonus units (of 58 du, only 26 would be affordable or less than 50%, so these are effectively market rate projects).
  - **For a project with 80% affordable units, the maximum density bonus permitted is 50%. For example, a project proposing 8 low income units and 2 market-rate units would be eligible for up to 4 bonus**

units, which may or may not be market-rate. In this scenario, the City cannot require that bonus units be affordable per State law.

- To achieve the 80% “super” density bonus, 100% of the units would be required by State law to be affordable, including density bonus units.
- **SF Adjacent Development Standards Needed** - These were not included in the staff’s proposal and should be evaluated along with the proposed amendment.
  - **Page 5 of the staff report states that** “The encroachment plane at right would apply to any property line shared with properties zoned RS (single-family) and RM-12 (two-unit lots). In addition, in the PS zones, projects would utilize the setback requirements of the least restrictive abutting zoning district.”
  - **As noted above, any site adjacent to an RS-zoned (single-family) parcel would be required to demonstrate compliance with an encroachment plane to ensure that the scale and massing of proposed projects are contextually appropriate with adjoining properties.**
- **Inclusion of School Sites is Consistent with General Plan Principle Supporting Public Education** - Need to at least include vacant school sites that are in targeted zoning districts. Also supports Housing Task Force desire for “institutional” housing without dramatically increasing number of sites. Updated EIR Addendum required.
  - **The direction of the Planning Commission (and staff’s recommendation) was to focus on religious institutional sites as locations of underutilized parcels. School sites have different operational characteristics that would require additional study and may be presented as part of a future code amendment, if desired.**
- **General Plan Amendments** - Zone change requires GP/SP updates and if this is not a zone change it runs into issues identified below with due process, spot zoning, equal access identified below.
  - **No zone map changes are proposed as part of the proposed amendment. The proposed Zoning Code text amendment is consistent with the General Plan.**

**PC Julianna Delgado**

**The Amendment creates a new land use category--“Religious Facility with Affordable Housing”--that supersedes an existing use with ‘By Right’ zoning, setting a precarious precedent.** “By Right” development eliminates the underlying zoning, substitutes development standards for those that would apply, and precludes any form of public, Planning Commission, or City Council participation in the approval process (other than appeals to the Council of a Design Commission approval).

“By-right” does not eliminate the underlying zoning. “By-right” means that there is no zoning entitlement required to allow the use. For example, multi-family housing projects in the City are “by-right” and do not require review by the Planning Commission or City Council. The proposed regulations require projects to be compliant with the City’s Zoning Code. Additionally, multi-family residential projects remain subject to design review.

**There is no draft ordinance to review and approve.** The ordinance will amend the Zoning Code. Staff reports are not used to regulate land use but Zoning Codes are. The exact language of the proposed ordinance for the Amendment, as members of the Planning Commission requested, should be provided to the public and the City Council before any actions are taken.

The City’s process for policymaking is to draft an ordinance after the Pasadena City Council approves the proposed policy and directs the City Attorney to prepare an ordinance.

**The Amendment essentially creates “mini-Planned Developments” (PDs), a *de facto* form of spot-zoning citywide.** Like the PD, the Amendment would erase base zoning designations; however, in this case a project would not be subject to contextual design considerations and discretionary review in any form. The eliminated discretionary reviews would include Pre-Development Review (“PPR”) by the City Council (required for 50 units or more), Planning Commission recommendation and City Council approval (currently required for PDs), and (potentially) Zoning Hearing Officer review for any affordable housing concessions (currently required for all eligible projects). **This means church-housing developers would be given *carte blanche* to build projects as**

they see fit that might be out-of-scale and context with their surroundings, citywide with no oversight. Given the number and location of churches, this 'one-size-fits-all' approach is consequential (see maps in Staff Report, Attachments E. and F.).

The proposed amendment does not provide for Zoning Map amendments, as a Planned Development would, and is not spot-zoning. The proposed amendment sets standards for certain types of land uses, which is an approach utilized throughout the Zoning Code, similar to Animal Hospitals, Urban Housing and City of Gardens projects.

The proposed amendment would require compliance with the requirements of the underlying zone. In cases where there are no underlying requirements, such as the PS (Public, Semi-Public) zone, projects would be required to comply with the development standards of the least restrictive adjacent zone.

**The Amendment erodes due process.** 'By right' undermines all public participation that has established the underlying zoning, including the 2015 General Plan Land Use Element Update and subsequent Specific Plan Updates now underway. This disregard for the public process and lack of governmental transparency further erodes the community's confidence and trust in the City Council and City staff. The City has spent approximately \$5 million in public funds on consulting and outreach costs, and the community has volunteered countless hours towards those efforts. 'By Right' eliminates the right of the community to weigh in on development issues that concern them. **All developers, including affordable housing ones, should abide by the community's underlying zoning and standards and respect the public engagement process.**

The proposed project would require any affordable housing developer to abide by the community's underlying zoning and standards as it requires compliance with the development standards of the underlying zone, or in the case of the PS (Public, Semi-Public) zone, compliance with the development standards of the least restrictive adjacent zone. "By-right" represents an objective review process where projects are reviewed for compliance with the development standards in the City's Zoning Code. Most development projects in the City are "by-right" and do not require review by the Planning Commission or City Council, such as a multi-family housing project. Many such projects, including multi-family housing, do require design review.

**If the Amendment is designed to help failing churches, then selling their surplus land at Fair Market Value, instead of doing ground leases, is more likely to ensure longer-term viability for religious institutions.** If church property is ground leased, religious institutions put their property at risk if the developer defaults on its financing. Have churches been provided a clear picture of the risks of ground leasing their land, which subsidizes development? While it benefits and protects the developer, the church's lease revenue for its land may be far less than if the church sold its property at Fair Market Value.

The proposed amendment is designed to provide for affordable housing options on currently underutilized land. The City is attempting to find solutions to the problem of affordable housing; the proposed amendment represents one such solution.

**Furthermore, if the underlying purpose of the Amendment is to help failing churches become financially solvent by building housing, "By Right" zoning may constitute favoritism, a special privilege that is contrary to the constitutional guarantee of equal protection.** What makes a religious business any better suited as a landlord than any other one?

The proposed amendment is designed to provide for affordable housing options on currently underutilized land. The City is attempting to find solutions to the problem of affordable housing; the proposed amendment represents one such solution.



**Extending the financial opportunity to all non-profits, especially those located in Public/Semi-Public zones, which currently prohibits housing would broaden the possibility of constructing more affordable housing citywide and do so in an equitable manner, a far better approach.**

The proposed amendment focuses on underutilized sites owned by religious institutions as those sites typically have limited operating hours and significant lengths of time where the sites are underutilized. Additional sites such as college campuses were also considered, however such sites have significantly different operational characteristics and would require additional analysis.

**Pasadena does not need any more market-rate housing.** If the purpose of the Amendment is genuinely to provide more affordable housing then, as the Planning Commission initially recommended, 100% of the units must be affordable. Staff has argued that 20% needs to be market rate to make the project 'pencil out' for developers. But no evidence has been presented in terms of development pro forma that has been analyzed by City staff.

The proposed amendment would require that projects provide a minimum of 80% affordable units.

**If application of the State Density Bonus law results in additional housing units, would the additional units be market rate or affordable?**

The City cannot require that units granted through density bonus be affordable, unless the project is a "super density bonus" project with an 80% or greater density bonus, in which case all units would be required to be affordable.

**The Amendment supersedes all previous entitlements for a site and is based on considering the 'least restrictive' adjacent use in applying development standards.** This means that all single-family residential districts—the 'most restrictive use'—adjacent to church properties are not considered or protected and might be severely impacted.

Existing entitlements on a site would remain and would not be required to be amended for a proposed affordable housing development. If the site is adjacent to an RS zone, an encroachment plane would apply that restricts the scale and massing of a proposed project. Additionally, if the proposed site is a PS zone and surrounded by RS zones, then the RS zone is the least restrictive adjacent zone and those standards would apply.

**Pasadena households of all ethnicities and income levels own and maintain single-family homes and the City's largest land use zone in terms of area is single-family residential.** The Amendment would allow upwards of 75 multi-family units next to a single-family house or duplex. There would be no limit if all units were affordable to very-low-income tenants and adjacent homeowners would have no recourse, except to appeal the physical design. Given the number and location of churches, this 'one-size-fits-all' approach is also consequential.

As noted in the question below, the maximum density permitted is 32 dwelling units per acre. Up to 75 units would be allowed by-right, however this would require a site of over 2 acres in size to be applicable.

**The Amendment allows a density of 32-units per acre on any parcel regardless of size with a "By Right" 75-unit cap. Why were these amounts specified and why are they appropriate citywide?**

Staff worked with affordable housing advocates and the Housing Department to understand the minimum densities required for project feasibility. Staff's understanding is that densities less than 32 dwelling units per acre are not financially feasible and would result in no affordable housing provided on these sites.

**Exceeding the 75-unit cap requires only a Minor Conditional Use Permit (MCUP).** The MCUP means that exceeding the cap would be approved at the City staff level with no public process, required noticing and community outreach. This would, again, by-pass the Planning Commission and other discretionary public review bodies.

A Minor Conditional Use Permit requires public notice and a public hearing would occur with the Hearing Officer if requested.

**In preparing the Amendment, the City made no concerted effort to reach out and inform the public at large--especially potentially impacted neighborhoods--about the long-term impacts of an Amendment that severely limits their civil right to appeal.**

The City has conducted a community meeting (with over 100 attendees) and has conducted public meetings on the issue with the Planning Commission (four times) as well as the City Council. The City has also provided public notice for the proposed Zoning Code Amendment consistent with the requirements of the Zoning Code.

In preparing the Addendum to the General Plan EIR, about nine (9) properties were identified where housing is not now allowed that would benefit from the Amendment, which Staff refused to disclose by address (See Attachment F.). **Because noticing of the CEQA document is not required by statute, neither the public at large nor the surrounding property owners of the identified sites were ever notified of potential impacts, which also includes negative impacts on their property values.**

The addendum identified approximately 9 mapped sites where the proposed amendment would be applicable. The proposed regulations are not a proposed development project, and no site-specific noticing is required or appropriate. Noticing regarding hearings for the proposed amendment was conducted in accordance with the requirements of the Zoning Code.

**Findings of Approval for the Amendment cannot be made as it is not in compliance with State law or the City's General Plan.** CA Government Code Sections 65030 and 65033 require public participation at every level of the planning process. In particular, Section 65030 states:

*The Legislature recognizes the importance of public participation at every level of the planning process. It is therefore the policy of the state and the intent of the Legislature that each state, regional, and local agency concerned in the planning process involve the public through public hearings, informative meetings, publicity and other means available to them, and that at such hearings and other public forums, the public be afforded the opportunity to respond to clearly defined alternative objectives, policies, and action.*

The City provided public notice for the proposed Zoning Code Amendment consistent with the requirements of the Zoning Code. The language referenced is the legislative intent of the State. The City's public notice requirement for Zoning Code Amendments complies with (and exceeds) the public notice requirement in State law (GC 65090).

**Importantly, Guiding Principle #7 of Pasadena's General Plan also states: "Community participation will be a permanent part of achieving a greater city." At no time has the public at large been adequately notified or given the opportunity to review viable alternatives or the proposed language of the Amendment.** The majority of input has come from a small number of proponents led by affordable housing developers and several churches.

The City provided public notice for the proposed Zoning Code Amendment consistent with the requirements of the Zoning Code.

**The Amendment does not require units to remain affordable should the property be sold and no longer under religious facility control.** Affordable housing covenants should be recorded and run with the land, not the financing.

Per Page 4 of the Council staff report, the proposed amendment specifically requires that affordable housing be covenanted, consistent with existing inclusionary housing requirements. Such covenants run with the land and are not contingent upon the religious facility.

**The Amendment is silent on how providing housing on church-owned land will be non-discriminatory if in conflict with religious beliefs.** Under the US Constitution, the First Amendment states that “...Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof.” **This may permit churches to discriminate against such groups as the LGBTQ community and people of color or other faiths.**

The City Attorney may provide additional analysis of this issue – any housing project that receives federal, state or local funding must comply with fair housing laws.

**The definition of ‘religious facility’ in the City’s Zoning Code is broad and vague, which the Amendment does not address.** The Planning Commission recommended more clarity, such as in order to benefit, a ‘religious facility’ must have operated as such and owned the subject site a minimum of five (5) years prior to applying for permits and provide proof of non-profit status. Otherwise, any developer could claim to be a ‘religious facility’ and build a “mini-PD” anywhere. **Does it have to stay a church for another 5 years post development?**

The proposed amendment would require verification that an existing religious facility has owned and operated a site for at least five years.

**Under CA Senate Bill 9, landmark and historic districts are excluded from residential development beyond the base zoning. However, the Amendment does not similarly exclude church-owned sites within those districts nor does it protect historic or historic-eligible church buildings per the Sec. of Interior’s standards, consistent with the City’s Historic Preservation Ordinance.**

Page 3 of the Council staff report states that *“the proposal would not be allowed in any single-family zoning districts and additional development standards are required for sites that abut single-family zones.”*

Page 5 of the staff report states that *“Development proposed on any site containing a designated historic resource, a site with an eligible historic resource, or a noncontributing site located within a designated historic or landmark district shall be subject to all applicable regulations within the City’s Historic Preservation Ordinance and the Secretary of the Interior’s Standards and subject to review as determined by Design & Historic Preservation staff.”* **This is consistent with how development is regulated and Historic Preservation is implemented in the City.**

The proposed amendment does not allow affordable housing projects on sites located within RS zones. SB 9 is State legislation specifically applicable to the development of duplexes in RS zones, and is not applicable to the proposed amendment.

In conclusion, most of Pasadena’s religious-owned property is zoned for housing but little has been built (see the Attachment F. map). No members of the clergy have spoken at Planning Commission or Housing Task Force meetings about the proposed Amendment to allow their congregation to build affordable housing on their surplus property. At the April 27, 2022, Planning Commission meeting, Staff confirmed that only one (1) religious facility, New Life Holiness Church, has approached the City to date to build housing where the zoning precludes it; however, this church has not applied for a zone change. **The proposed Amendment appears to be driven more by developers who stand to profit from these housing developments than by churches.**

The goal of the proposed amendment is to provide opportunities for affordable housing on underutilized parcels within the City. Some sites with religious institutions are underutilized from a land use perspective as the use is active for limited hours and contain parking lots that are utilized on a limited basis. The state additionally recognized the potential benefits of affordable housing on underutilized religious properties when it adopted AB 1851, which allows for up to 50% of existing religious facility parking lots to be

developed with affordable housing. The proposed amendment would make affordable housing a permitted use on such sites, allowing them to utilize the provisions of AB 1851.

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**From:** Williams, Felicia <[fwilliams@cityofpasadena.net](mailto:fwilliams@cityofpasadena.net)>  
**Sent:** Monday, May 23, 2022 9:37 AM  
**To:** Gordo, Victor <[vgordo@cityofpasadena.net](mailto:vgordo@cityofpasadena.net)>; Kurtz, Cynthia <[ckurtz@cityofpasadena.net](mailto:ckurtz@cityofpasadena.net)>; Reyes, David <[davidreyes@cityofpasadena.net](mailto:davidreyes@cityofpasadena.net)>  
**Cc:** De La Cuba, Vannia <[VDeLaCuba@cityofpasadena.net](mailto:VDeLaCuba@cityofpasadena.net)>; Jomsky, Mark <[mjomsky@cityofpasadena.net](mailto:mjomsky@cityofpasadena.net)>; Bagneris, Michele <[mbagneris@cityofpasadena.net](mailto:mbagneris@cityofpasadena.net)>  
**Subject:** Fw: May 23rd City Council Agenda Item#18 -- Religious Housing -- Commissioner DELGADO Comment Letter

The issues raised in Dr. Delgado's letter below are significant and **I am requesting that we continue this item** so staff can provide the research and respond to the questions. To add on the the items below, the following issues are of concern to me:

- **Protection of Historic/Landmark Districts** - After our win on SB9 (yes, I am calling it a WIN!!) this proposal could potentially harm our landmark/historic districts and resources that we just fought to protect. Clearer protections along with a list of eligible resources (forthcoming with the citywide historic survey) are needed.
- **State Density Bonus Law Makes Projects Less Affordable** - Staff report needs to analyze impact of SBDL on (1) total density (if we approve staff rec of 32 du/acre are we effectively approving 58 du/acre with density bonus?); and (2) affordability of bonus units (of 58 du, only 26 would be affordable or less than 50%, so these are effectively market rate projects).
- **SF Adjacent Development Standards Needed** - These were not included in the staff's proposal and should be evaluated along with the proposed amendment.
- **Inclusion of School Sites is Consistent with General Plan Principle Supporting Public Education** - Need to at least include vacant school sites that are in targeted zoning districts. Also supports Housing Task Force desire for "institutional" housing without dramatically increasing number of sites. Updated EIR Addendum required.
- **General Plan Amendments** - Zone change requires GP/SP updates and if this is not a zone change it runs into issues identified below with due process, spot zoning, equal access identified below.

Thanks.

Councilmember Felicia Williams  
City of Pasadena, District 2  
<https://www.cityofpasadena.net/district2/>  
[fwilliams@cityofpasadena.net](mailto:fwilliams@cityofpasadena.net)  
(626) 744-4742

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**From:** julianna <[julianna.delgado@sbcglobal.net](mailto:julianna.delgado@sbcglobal.net)>  
**Sent:** Monday, May 23, 2022 7:35 AM  
**To:** Gordo, Victor <[vgordo@cityofpasadena.net](mailto:vgordo@cityofpasadena.net)>; De La Cuba, Vannia <[VDeLaCuba@cityofpasadena.net](mailto:VDeLaCuba@cityofpasadena.net)>; Williams, Felicia <[fwilliams@cityofpasadena.net](mailto:fwilliams@cityofpasadena.net)>; Dyson, Darla <[ddyson@cityofpasadena.net](mailto:ddyson@cityofpasadena.net)>; Rivas, Jessica <[jerivas@cityofpasadena.net](mailto:jerivas@cityofpasadena.net)>; Morales, Margo <[mlmorales@cityofpasadena.net](mailto:mlmorales@cityofpasadena.net)>; district1 <[district1@cityofpasadena.net](mailto:district1@cityofpasadena.net)>; Madison, Steve <[smadison@cityofpasadena.net](mailto:smadison@cityofpasadena.net)>; Wilson, Andy

<awilson@cityofpasadena.net>; jikennedy@cityofpasadena.net <jikennedy@cityofpasadena.net>; Masuda, Gene <gmasuda@cityofpasadena.net>

Cc: 'Julianna' <julianna.delgado@sbcglobal.net>; 'David Delgado' <david@daviddelgadolaw.com>; Reyes, David <davidreyes@cityofpasadena.net>

**Subject:** RE: May 23rd City Council Agenda Item#18 -- Religious Housing -- Commissioner DELGADO Comment Letter

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Honorable Mayor and Members of the City Council,

Pasadena needs more affordable housing. As a longtime advocate of housing as a human right, I have pushed for more affordable units citywide on underutilized land. However, I have serious concerns at this time about amending Pasadena's Zoning Code to create a new Land Use Category, "Religious Facility with Affordable Housing" ("the Amendment"), given the many issues raised, questionable purpose, inherent inequity as written, disregard for the entire community, and limited possibility to increase significantly housing affordability. Furthermore, in compliance with State law (CA Govt. Sec. 65030) and best professional planning practices, the Staff Report does not disclose or discuss the potentially vast unintended consequences. Thus, as a Planning Commissioner and Design Commissioner, I voted against recommending the Amendment for the following reasons:

- **The Amendment creates a new land use category--"Religious Facility with Affordable Housing"--that supersedes an existing use with 'By Right' zoning, setting a precarious precedent.** "By Right" development eliminates the underlying zoning, substitutes development standards for those that would apply, and precludes any form of public, Planning Commission, or City Council participation in the approval process (other than appeals to the Council of a Design Commission approval).
- **There is no draft ordinance to review and approve.** The ordinance will amend the Zoning Code. Staff reports are not used to regulate land use but Zoning Codes are. The exact language of the proposed ordinance for the Amendment, as members of the Planning Commission requested, should be provided to the public and the City Council before any actions are taken.
- **The Amendment essentially creates "mini-Planned Developments" (PDs), a *de facto* form of spot-zoning citywide.** Like the PD, the Amendment would erase base zoning designations; however, in this case a project would not be subject to contextual design considerations and discretionary review in any form. The eliminated discretionary reviews would include Pre-Development Review ("PPR") by the City Council (required for 50 units or more), Planning Commission recommendation and City Council approval (currently required for PDs), and (potentially) Zoning Hearing Officer review for any affordable housing concessions (currently required for all eligible projects). **This means church-housing developers would be given *carte blanche* to build projects as they see fit that might be out-of-scale and context with their surroundings, citywide with no oversight.** Given the number and location of churches, this 'one-size-fits-all' approach is consequential (see maps in Staff Report, Attachments E. and F.).
- **The Amendment erodes due process.** 'By right' undermines all public participation that has established the underlying zoning, including the 2015 General Plan Land Use Element Update and subsequent Specific Plan Updates now underway. This disregard for the public process and lack of governmental transparency further erodes the community's confidence and trust in the City Council and City staff. The City has spent approximately \$5 million in public funds on consulting and outreach costs, and the community has volunteered countless hours towards those efforts. 'By Right' eliminates the right of the community to weigh in on

development issues that concern them. **All developers, including affordable housing ones, should abide by the community's underlying zoning and standards and respect the public engagement process.**

- **If the Amendment is designed to help failing churches, then selling their surplus land at Fair Market Value, instead of doing ground leases, is more likely to ensure longer-term viability for religious institutions.** If church property is ground leased, religious institutions put their property at risk if the developer defaults on its financing. Have churches been provided a clear picture of the risks of ground leasing their land, which subsidizes development? While it benefits and protects the developer, the church's lease revenue for its land may be far less than if the church sold its property at Fair Market Value.
- **Furthermore, if the underlying purpose of the Amendment is to help failing churches become financially solvent by building housing, "By Right" zoning may constitute favoritism, a special privilege that is contrary to the constitutional guarantee of equal protection.** What makes a religious business any better suited as a landlord than any other one?
- **Extending the financial opportunity to all non-profits, especially those located in Public/Semi-Public zones, which currently prohibits housing would broaden the possibility of constructing more affordable housing citywide and do so in an equitable manner, a far better approach.**
- **Pasadena does not need any more market-rate housing.** If the purpose of the Amendment is genuinely to provide more affordable housing then, as the Planning Commission initially recommended, 100% of the units must be affordable. Staff has argued that 20% needs to be market rate to make the project 'pencil out' for developers. But no evidence has been presented in terms of development pro forma that has been analyzed by City staff.
- **If application of the State Density Bonus law results in additional housing units, would the additional units be market rate or affordable?**
- **The Amendment supersedes all previous entitlements for a site and is based on considering the 'least restrictive' adjacent use in applying development standards.** This means that all single-family residential districts—the 'most restrictive use'—adjacent to church properties are not considered or protected and might be severely impacted.
- **Pasadena households of all ethnicities and income levels own and maintain single-family homes and the City's largest land use zone in terms of area is single-family residential. The Amendment would allow upwards of 75 multi-family units next to a single-family house or duplex. There would be no limit if all units were affordable to very-low-income tenants and adjacent homeowners would have no recourse, except to appeal the physical design. Given the number and location of churches, this 'one-size-fits-all' approach is also consequential.**
- **The Amendment allows a density of 32-units per acre on any parcel regardless of size with a "By Right" 75-unit cap. Why were these amounts specified and why are they appropriate citywide?**
- **Exceeding the 75-unit cap requires only a Minor Conditional Use Permit (MCUP).** The MCUP means that exceeding the cap would be approved at the City staff level with no public process, required noticing and

community outreach. This would, again, by-pass the Planning Commission and other discretionary public review bodies.

- **In preparing the Amendment, the City made no concerted effort to reach out and inform the public at large--especially potentially impacted neighborhoods--about the long-term impacts of an Amendment that severely limits their civil right to appeal.**
- In preparing the Addendum to the General Plan EIR, about nine (9) properties were identified where housing is not now allowed that would benefit from the Amendment, which Staff refused to disclose by address (See Attachment F.). **Because noticing of the CEQA document is not required by statute, neither the public at large nor the surrounding property owners of the identified sites were ever notified of potential impacts, which also includes negative impacts on their property values.**
- **Findings of Approval for the Amendment cannot be made as it is not in compliance with State law or the City's General Plan.** CA Government Code Sections 65030 and 65033 require public participation at every level of the planning process. In particular, Section 65030 states:

*The Legislature recognizes the importance of public participation at every level of the planning process. It is therefore the policy of the state and the intent of the Legislature that each state, regional, and local agency concerned in the planning process involve the public through public hearings, informative meetings, publicity and other means available to them, and that at such hearings and other public forums, the public be afforded the opportunity to respond to clearly defined alternative objectives, policies, and action.*

- **Importantly, Guiding Principle #7 of Pasadena's General Plan also states: "Community participation will be a permanent part of achieving a greater city." At no time has the public at large been adequately notified or given the opportunity to review viable alternatives or the proposed language of the Amendment.** The majority of input has come from a small number of proponents led by affordable housing developers and several churches.
- **The Amendment does not require units to remain affordable should the property be sold and no longer under religious facility control.** Affordable housing covenants should be recorded and run with the land, not the financing.
- **The Amendment is silent on how providing housing on church-owned land will be non-discriminatory if in conflict with religious beliefs.** Under the US Constitution, the First Amendment states that "...Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof." **This may permit churches to discriminate against such groups as the LGBTQ community and people of color or other faiths.**
- **The definition of 'religious facility' in the City's Zoning Code is broad and vague, which the Amendment does not address.** The Planning Commission recommended more clarity, such as in order to benefit, a 'religious facility' must have operated as such and owned the subject site a minimum of five (5) years prior to applying for permits and provide proof of non-profit status. Otherwise, any developer could claim to be a 'religious facility' and build a "mini-PD" anywhere. **Does it have to stay a church for another 5 years post development?**
- **Under CA Senate Bill 9, landmark and historic districts are excluded from residential development beyond the base zoning. However, the Amendment does not similarly exclude church-owned sites within those**

## McMillan, Acquanette (Netta)

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**From:** Marsha Rood  
**Sent:** Monday, May 23, 2022 4:47 PM  
**To:** PublicComment-AutoResponse  
**Subject:** Item # 18 May 23, 2022

**Importance:** High

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Dear Mayor Gordo and Members of the City Council -

The Planning Director stated that the reason for the 32 du/acre recommendation is that density is needed for affordable housing projects to "pencil."

**If his rationale is that the basis for dwelling unit density in the Zoning Code is for financial reasons, it is not in accordance with law. It has to be on the basis of the police powers of the state and on health and safety. The U.S Supreme Court held in the case (1926) *Ambler Realty v Village of Euclid* that zoning ordinances, regulations and laws must find their justification in some aspect of police powers and asserted for the benefit of the public welfare. Public welfare being determined in connection with the circumstances, the conditions and the locality of the zoning. It says nothing about the "financial feasibility" of a development as being part of the public welfare.**

**Basically, you cannot determine zoning based on what pencils for development projects - it undermines the whole concept and legal basis for zoning.**

Thank you for your consideration.

Marsha Rood, FAICP

05/23/2022  
Item 18



**McMillan, Acquanette (Netta)**

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**From:** Patti Feldmeth  
**Sent:** Monday, May 23, 2022 4:34 PM  
**To:** PublicComment-AutoResponse  
**Subject:** #18 on Agenda, Monday May 23, 2022

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**#18 Agenda Item Rezoning of Religious land for Affordable Housing**

Good Evening City Council Members:

I'm requesting that the city council vote to approve the rezoning of religious land for use to build affordable housing in Pasadena. Doing this will help Pasadena reach its state mandated target of 6,000 new affordable housing units by October 2029.

I'm requesting that the city council vote for a zoning amendment that will actually work to help accomplish this challenge –one where the planning and housing departments work together, bringing both their strengths to provide a viable plan.

My husband and I have been home owners in Pasadena for 34 years. My husband has worked in Pasadena schools for 46 years. We have raised three children in this wonderful city and if things don't change, 2 of my 3 children will never be able to rent a place to live in Pasadena. Forget about purchasing a home.

Those who work in or grew up in and love this city should be able to afford to live here. They want to be able live, work, play, raise families and give back to make and keep Pasadena a city that is equitable. It seems that most of the new building is only for the wealthy. The "token" low income units are not enough. If significant progress doesn't happen soon, those who work in or near Pasadena will be forced to leave like so many others.

You have an opportunity here to vote to provide a step forward that brings a true Fair Housing solution to those who love this city .

Please vote to approve rezoning of religious land for affordable housing in Pasadena.

05/23/2022  
Item 18

Sincerely,

Patti Feldmeth

Executive Director

Pasadena Meals on Wheels

**districts nor does it protect historic or historic-eligible church buildings per the Sec. of Interior's standards, consistent with the City's Historic Preservation Ordinance.**

In conclusion, most of Pasadena's religious-owned property is zoned for housing but little has been built (see the Attachment F. map). No members of the clergy have spoken at Planning Commission or Housing Task Force meetings about the proposed Amendment to allow their congregation to build affordable housing on their surplus property. At the April 27, 2022, Planning Commission meeting, Staff confirmed that only one (1) religious facility, New Life Holiness Church, has approached the City to date to build housing where the zoning precludes it; however, this church has not applied for a zone change. **The proposed Amendment appears to be driven more by developers who stand to profit from these housing developments than by churches.**

I urge you to continue the Amendment until these and other community issues raised are resolved.

Sincerely,

Julianna Delgado

**Julianna Delgado, M.Arch, Ph.D, FAICP**

Planning Commissioner, City of Pasadena

Design Commissioner, City of Pasadena

Member, Mayor's Housing Task Force, City of Pasadena

President, Southern California Planning Congress

Professor Emerita, Department of Urban and Regional Planning

Co-Director, California Center for Land and Water Stewardship

California State Polytechnic University, Pomona