

APPEAL APPLICATION

GENERAL INFORMATION: (Please print)

 Date: October 6, 2025

 Appellant: The Maryland HOA

 Mailing Address: 80 N Euclid Ave.

 City: Pasadena State: CA Zip: 91101

 Phone #: (day) 818-550-1800 (evening) 323-791-8837 Fax #: 818-550-1850

 Contact Person: Silvio Nardoni Phone #: 818-550-1800

 E-mail Address of Contact Person: silvio@archimedeslaw.com

 Applicant (if different from appellant): All Saints Church/Erica Tamblyn
APPEAL APPLICATION

ZENT2025-00039

 Application # MCUP 7318 Date of Decision 09/25/2025 Appeal Deadline 10/06/2025

 Property Address: 202 N Euclid Ave, Pasadena, CA

 I hereby appeal the decision of the: Board of Zoning Appeals

The decision maker failed to comply with the provisions of the zoning ordinance in the following manner:

See attached statement of grounds for appeal.

If necessary, please attach additional sheets



Applicant's Signature

October 6, 2025

Date of Application

 RECEIVED
2025 OCT -6 PM 1:51
CITY CLERK
CITY OF PASADENA

Activity # _____

Application Fee: \$ _____

Date Received: _____

Appeal Hearing Date _____

Received by: _____



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CITY CLERK
CITY OF PASADENA

Attached to Request for Appeal of MCUP #7318

October 6, 2025

The Honorable City Council
of the City of Pasadena
Pasadena City Hall
100 N. Garfield Ave.
Pasadena, California 91101

Re: Appeal of Board of Zoning Appeals' decision on MCUP #7318,
proposed Safe Parking use at the parking lot at 202 N. Euclid Ave.

Honorable Members of the City Council:

The Maryland Homeowners Association ("The Maryland") submits this letter as additional information attached to The Maryland's Request for Appeal of the Board of Zoning Appeals (the "BZA's") September 25, 2025 decision granting, with modifications, the application of Erica Tamblyn on behalf of All Saints Church for a Minor Conditional Use Permit ("MCUP") to allow a proposed Safe Parking operation on the parking lot at 202 N. Euclid Avenue, located at the southeast corner of Euclid and Walnut (the proposed "Safe Parking site").

The MCUP would allow up to 25 vehicles of homeless individuals to park between the hours of 7 p.m. and 7 a.m. on the Safe Parking site. The MCUP would not cap the number of individuals in those vehicles. All Saints proposes the Safe Parking operation be operated by Shower of Hope, which the City of Los Angeles recently de-funded.¹ The proposed Safe Parking operation is not limited to or even

¹ See the video of the BZA's Sept. 25, 2025, hearing at time-stamp 2:03:20 (acknowledging the de-funding) available here: https://pasadena.granicus.com/player/clip/8114?view_id=35&redirect=true.

required to favor homeless individuals from Pasadena. So, while the staff report to the BZA may be correct that the proposed Safe Parking operation may mean “fewer individual will be parking or sleeping in residential areas or on public sidewalks or streets,” these may well not be Pasadena’s residential areas, public sidewalks, and streets. All of the Safe Parking participants could drive in from Los Angeles.

Goodness knows the City of Los Angeles needs all the help it can get. But that help should not come at the expense of the jeopardizing the safety of a Pasadena neighborhood and its residents. This Council’s charge is, of course, to protect Pasadena’s residents. At the hearings before the Hearing Officer and the BZA, every person who lives in the neighborhood of the Safe Parking site opposed the proposed operation. Everyone (other than All Saints staff and parishioners) who works near the Safe Parking site opposed to it. The people who spoke in favor of the proposed operation were overwhelmingly All Saints staff and parishioners, none of whom live in the neighborhood, and none of whom will have to deal with the negative effects of the proposed Safe Parking operation.

Turning to the legal bases of The Maryland’s appeal, the BZA’s findings and decision were in error for three reasons:

- First, the proposed Safe Parking site is not a religious facility site, and therefore the Zoning Code does not allow the proposed operation there.
- Second, the proposed Safe Parking use is not an exempt project under the California Environmental Quality Act (CEQA) as involving “negligible or no expansion” of existing use because the proposed Safe Parking operation is a change of use, and the intensity of activity will expand significantly, causing a negative environmental impact.
- Third, the proposed Safe Parking operation would negatively affect the safety of the neighborhood, as the evidence, below, and which was presented to the BZA, demonstrates.

1. The Zoning Code does not allow Safe Parking on the proposed parking lot because it is not a religious facility site.

The City’s zoning code allows Safe parking operations in the PS (Public and Semi-Public) zoning district, where All Saints Church and the proposed Safe Parking site are located, as long as additional conditions are met. One additional

condition is that the Safe Parking operation must be located on one of several specified types of sites. The type relevant here is a “religious facility” site. (Zoning Code section 17.24.030 Table 2-5; section 17.50.265.)

Pasadena Zoning Code section 17.80.20 defines a “religious facility” as a facility “in which the primary use is religious worship.” While the Code notes that a religious facility “may include related accessory activities,” including the sorts of charitable and pastoral activities that commonly occur inside church buildings, such as “religious education, ministry, clothing and food distribution, counseling, employment assistance, referral services, and support groups,” the Code explicitly excludes “[o]ther uses (e.g., private schools and child day-care centers) that are located on the site of a religious assembly.” For-profit commercial parking is surely an excluded “other use.”

The Code does not define “facility.” Merriam-Webster Dictionary defines it as “something (such as a hospital) that is built, installed, or established to serve a particular purpose.” (See <https://www.merriam-webster.com/dictionary/facility>.) The American Heritage Dictionary defines it as a “building, room, array of equipment, or a number of such things, designed to serve a particular function: hospitals and other health care facilities.” (See <https://ahdictionary.com/word/search.html?q=facility>.)

The Code defines a primary use as the “main purpose for which a site is developed and occupied, including the activities that are conducted on the site a majority of the hours during which activities occur.” (Zoning Code section 17.80.020.)

A religious facility under the Zoning Code is thus a structure or assembly location and related equipment whose main purpose is religious worship. In short, and relevant to the current dispute, it’s a church and its appointments. The Code thus excludes from being a religious facility site any site whose main use is for-profit commercial activity—such as for-profit commercial parking—since a site’s primary use cannot be both for-profit commercial activity and religious worship.

The BZA legally erred in identifying the location of All Saints’ “religious facility site.” The alleged location of All Saints’ church site as depicted, in a presentation staff made to the BZA and upon which the BZA rendered its decision, is shown within a thick yellow line:



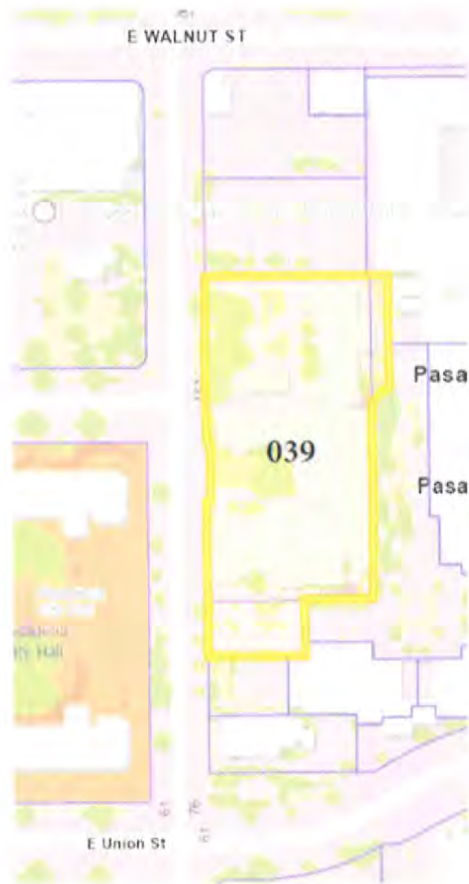
The yellow line surrounds almost the entire western half of the block from Walnut Street on the north to the edge of Plaza Las Fuentes on the south. The staff presentation indicates in red where the proposed Safe Parking operation will occur.

To understand why this yellow line misidentifies All Saints’ “religious facility” site, it’s essential to understand that the yellow line surrounds three distinct parcels, shown below with the last three digits of the parcels’ associated Assessor’s Parcel Numbers (APNs).²

² Trinity Church provides a useful contrast. Its safe parking program is sited on its non-commercial parking lot that primarily services and is on the same parcel as the church. Trinity’s parking lot is thus on a religious facility site and qualifies to host a Safe Parking program under the City’s Zoning Code.



The southernmost and largest parcel (“Parcel 039”) has APN 5723-017-**039** and the Church’s address of 132 N. Euclid Avenue:



As you can see from the aerial photograph and All Saints' campus map, below, Parcel 039 contains all of All Saints' facilities for religious worship and related accessory activities —the sanctuary, chapel, guild room, rector's office, etc. (As discussed later, Parcel 039 contains several lots.)

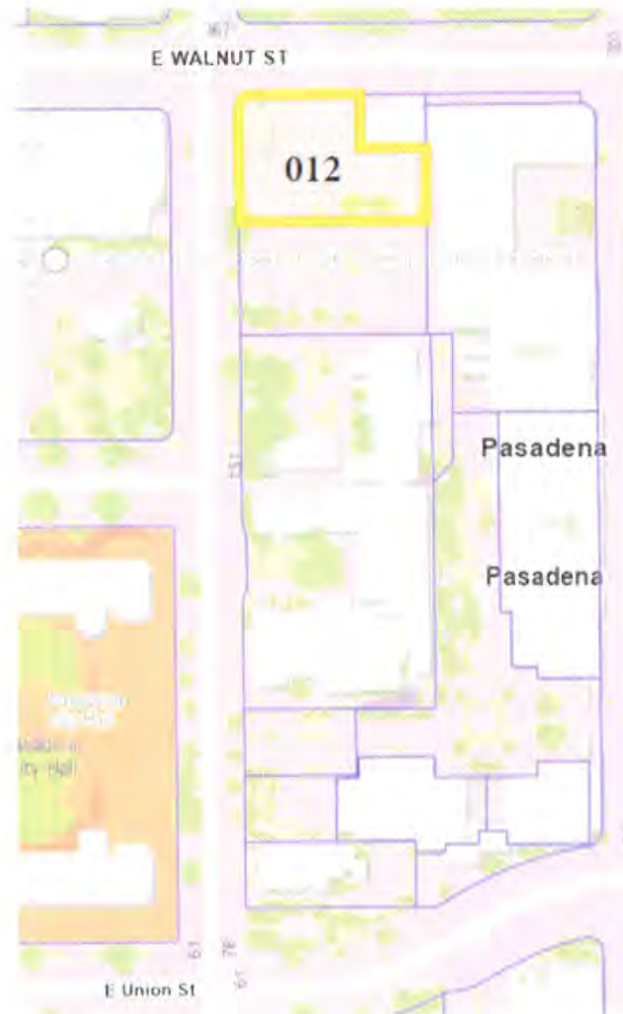


The middle parcel ("Parcel 040") has APN 5723-017-**040** and no listed separate address:



Parcel 040 is a parking lot, part of which is for-profit commercial. This parking lot contains 55 parking spaces, of which 30 are reserved for All Saints' exclusive use. The remaining 25 spaces are commercially rented on a daily basis, primarily to people parking at the courthouse located across Euclid Ave. All Saints uses some of the 25 spaces outside of business hours for attendees of church activities, especially on Sunday mornings. Except when All Saints has a choir rehearsal or other evening program, the lot has few cars parked on it during the evening. The lot is nearly empty between 10 p.m. and 7 a.m. the next morning, when court-parkers start arriving on Mondays through Friday, or when parishioners start arriving on Sunday mornings or religious holidays. The lot is only lightly used on Saturdays.

The northernmost parcel ("Parcel 012")—the parking lot on which All Saints proposes to operate the Safe Parking program—has APN 5723-017-**012** and no listed separate address:



Parcel 012 is entirely a for-profit commercial parking lot, except for one small storage structure at the corner of Euclid and Walnut which occupies (as one can see above) around one-tenth of the parcel. This parcel was a for-profit commercial parking lot when All Saints purchased it in 1992 and has remained so ever since. The parking lot contains 50 spaces, all of which are available for commercial use from 7 a.m. until 5 p.m. on weekdays, and used primarily by people parking to go to the courthouse located across Euclid Ave. Consistent with primarily servicing court-attendees, the parking lot has minimal turn-over during the course of the day. None of the spaces are reserved for All Saints' exclusive use, though All Saints uses some of the spaces outside of business-hours for attendees of church activities, especially on Sunday mornings. Except when All Saints has a choir rehearsal or other program, the lot has few cars parked on it during the evening. The lot is usually empty between 10 p.m. and 7 a.m. the next morning,

when court attendees or parishioners start arriving. The lot is mostly empty on Saturdays.

During the June 18 hearing before the Hearing Officer, the Hearing Officer asked “when is the church building and parking being used for church services?”³ An All Saints’ representative responded “practically 24/7,” listing near-constant activities: children’s choir rehearsals, safe haven programs, 12-step groups, committee meetings, and so on. But these are all activities that occur inside the church buildings and the lawn and playground on Parcel 039. They are not activities on the commercial parking lot on Parcel 012. Uncontested testimony by a speaker, Mr. Nardoni, was that the Safe Parking site is definitely not used “24/7.”⁴ As stated, most of the use of Parcel 012 consists of commercial parking during court-hours. The Maryland intends to supplement this appeal by providing photographic evidence that the usage of Parcel 012 falls far below the claimed “24/7.”

Parcel 012’s primary use is, thus, for-profit commercial parking, not religious worship or accessory activities consonant with a “religious facility.” The lot is developed and occupied as a parking lot, as it has been since All Saints purchased it in 1992. Most of the vehicles most of the time are parked on Parcel 012 by paying customers, not church-attendees. By any reasonable interpretation of the term, Parcel 012 is, therefore, not a religious facility site. Accordingly, the location is not eligible for a Safe Parking use, and the applicant does not qualify for an MCUP under Zoning Code section 17.24.030 Table 2-5.

To avoid this conclusion, the BZA relied on staff’s assertion that all three parcels are part of a single religious facility site based on the definition of “site” at Zoning Code section 17.80.020 (Definitions):

Site.

A lot or group of contiguous lots not divided by any alley, street, other right-of-way or city limit that is proposed for development in accord with the provisions of this Zoning Code, and is in a single ownership or has multiple owners, all of whom join in an application for development.

³ See Hearing Officer’s June 18, 2025, hearing video at time-stamp 31:25 here: <https://www.cityofpasadena.net/commissions/audio-video-recordings/>.

⁴ Hearing Officer hearing at time-stamp 55:30.

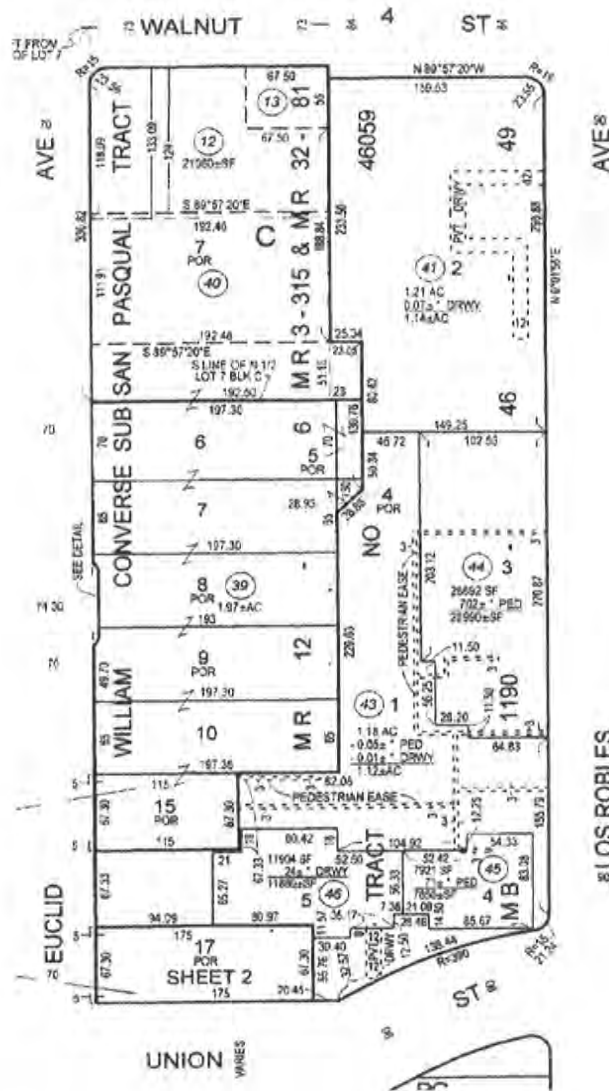
This definition contemplates a group of contiguous lots constituting a single site when a single proposed development spans the lots. While All Saints owns all three parcels and their constituent lots (Parcel 039 contains six lots), the *group* of lots is not proposed for development. The development is proposed only for the lot constituting Parcel 012, not any of Parcel 039, which is composed of the lots containing the church and structures for religious accessory activities.

Three final points support The Maryland's position. First, there appear to be no cases (The Maryland could find none) in which a "site" was identified as constituting multiple lots even though the proposed development would occur only one lot. The Maryland *did* find cases to the contrary. For example, in the staff report before the Hearing Officer for the May 15, 2024 hearing on CUP #7139, staff identified the "site" as the specific area where Caltech proposed to develop its Ginsburg Center for Quantum Precision Measurement. The "site" did not include Caltech contiguous acreage. (The Caltech campus encompasses approximately 124 acres.) Nor did the site include all of the approximately 28 acres of the parcel on which the approximately 1.6 acre development would occur.

Second, the title reports for the three parcels confirm the primary uses The Maryland has ascribed to them. See Exhibit A, attached, which contains the first, "Property Basics" pages of the title reports for the three parcels, showing the primary uses of each parcel:

- Parcel 5723-017-**039** / Type: Miscellaneous (Religious)
- Parcel 5723-017-**040** / Type: Commercial (Parking Lot, Parking Structure)
- Parcel 5723-017-**012** / Type: Commercial (Parking Lot, Parking Structure)

Third and finally, the plat map for the three parcels shows that Parcel 039, which contains all of the religious facilities and structures for religious accessory activities is distinct from Parcel 012 where the Safe Parking is proposed. Here is the plat:



Parcel 039 (indicated by the “39” in a circle) consists (going north to south) of Lots 6, 7, 8, 9, 10, and 15. These lots are all lot-tied, as indicated by the Z-shape on the lines separating them. Parcel 040 (indicated by the “40” in a circle) consists of one lot that is also called Lot 7. That Lot 7 was lot-split along the dash-line running between “San” and “Pasqual” on the plat. Parcel 039’s Lot 6 is, as the Z-shape indicates, lot-tied to the southern part (below the dashed line) of Parcel 040’s Lot 7. The parking lot on Parcel 040 is the portion of the Lot 6 north of the dashed line. That parking lot is not lot-tied to the religious facilities on the lot south of it. And the parking lot on the Lot comprising the whole of Parcel 012 is not lot-tied to any of Parcel 040. In other words, the commercial parking lots on Parcel 040 and Parcel 012 are not legally joined to the All Saints’ church facilities. We are dealing

with three distinct sites—only one of which, the parking lot on Parcel 012, is proposed for development in the application for MCUP #7318

The inescapable conclusion is that the parking lot on Parcel 012 on which All Saints is proposing a Safe Parking operation is not a religious facility and may not, therefore, legally host a Safe Parking operation. The Maryland's appeal of the BZA's determination must be granted, the BZA's decision overturned, and All Saints' application for MCUP #7318 denied.

2. The BZA's CEQA determination is improper because the proposed Safe Parking use is not exempt from environmental review.

Staff's recommendation for approval of the permit application rests on two acts of semantic legerdemain. As discussed above, Staff first argues that the Safe Parking program constitutes a development, because it establishes a land use, namely parking. But that is already the primary use of the only Parcel on which the purported development will occur. Staff employs a similar tactic in its analysis of why the development qualifies for exemption from environmental review. It argues, as it must, that the new land use requires a permit to comply with the Zoning Code, and then asserts that the new use is a minor or negligible expansion of the former use.

The BZA adopted the Staff Report's proposed environmental determination that the project is exempt from environmental review pursuant to 14 CCR § 15301 Class 1 and in the absence of any unusual circumstances. This Class 1 exemption applies to the operation of facilities "involving negligible or no expansion of existing or former use." That determination is in error because:

- Granting the MCUP would increase the hours of operation of the Safe Parking site operates by 120%.⁵

⁵ The hours of operation would increase from 7 a.m. to 5 p.m. to include 7 p.m. to 7 a.m., an increase from 10 to 22 hours. If one includes as part of the CEQA baseline the hours during which a substantial number cars are on the parking lot (which includes when All Saints' attendees park on the lot outside of business hours on Monday to Friday), then the hours would increase from 7 a.m. to 10 p.m. to include 10 p.m. to 7 a.m.—a 60% increase.

- Granting the MCUP would increase the number of cars authorized to park in the proposed Safe Parking site (Parcel 012) weekday by approximately 50%.⁶
- Granting the MCUP would be a change of use because the parking lot would be used for shelter 12 hours each day. That this is a change of use is evidenced by All Saints' requiring a new *use* permit. Staff acknowledged that the Safe Parking operation is a new, not an existing, use.⁷

These increases cannot be “negligible or no expansion” of use. Merriam-Webster Dictionary defines “negligible” as “so small or unimportant or of so little consequence as to warrant little or no attention.” (See <https://www.merriam-webster.com/dictionary/negligible>.) The American Heritage Dictionary similarly defines it as “[n]ot significant or important enough to be worth considering; trifling.” (See <https://ahdictionary.com/word/search.html?q=negligible>.)

The Safe Parking operation's expansion and/or change of use will have significant negative environmental effects warranting robust attention and consideration. A significant effect on the environment is statutorily defined as “a substantial, *or potentially substantial*, adverse change in the environment” including air and noise. (Public Resources Code sections 21068 and 21060.5.)

Chief among the significant negative effects will be air pollution from participants idling their vehicles (parked with engines running). *See Sunflower All. v. Dep't of Conservation* (2024) 105 Cal. App. 5th 771, 784-85 (CEQA recognizes cars harm air quality.) Safe Parking participants will inevitably idle their cars while waiting to drive into the lot when it opens each evening. (*See* Recording of Hearing Officer hearing at 1:00:43 (participants “will not go very far away because they want to get back and get their prime parking spot”). Participants will also

⁶ The proposed Safe Parking site would increase from approximately 50 daily cars to include an additional 25 cars each evening, an increase of 50%. (Because of the court-oriented function of the parking lot, there is little turn-over during the day. So, the number of parking spaces is a reasonable proxy for the number of vehicles.) If one added the parking spaces on Parcel 040 (including those for the exclusive use of All Saints) to Parcel's 012's spaces as part of the CEQA baseline, then the total would increase from approximately 90 cars to include an additional 25 cars—a 27% increase.

⁷ In answering the BZA's question whether the Safe Parking operation is a development under the City's Zoning Code, staff said it is because it is the “establishment of a land use.” See September 25, 2025 BZA hearing video at time-stamp 2:19:00-:20.

inevitably idle their cars while on the Safe Parking site to run their air-conditioning or heaters when the weather is hot or cold.

An idling engine produces 20 times more pollution than a car travelling at 32 m.p.h.⁸ Idling fuel usage varies from 0.2 to 0.5 gallons per hour for passenger vehicles across a range of sizes, and increases with idling speed.⁹ Thus, we have the commonly cited estimate that allowing your car to idle for two minutes is equivalent of driving one mile. Using this metric, 25 vehicles each idling for 60 minutes is equivalent of driving 750 miles. All of the pollution from these 750-miles-driving-equivalent will, of course, not be spread out over 750 miles but will all be discharged on and in the neighborhood of the Safe Parking site. The Euclid Avenue block between Walnut and Union is 0.16 mile. Thus, the 750-miles-driving-equivalent is equal to 4,687 cars driving down this block each day. This more than doubles the current level of traffic on this section of Euclid.¹⁰

The proposed Safe Parking operation will also potentially substantially increase the noise in a neighborhood with residences and a hotel. The MCUP requires participants comply with the City's Noise Ordinance, but that is aspirational. In reality, 25 vehicles with an indeterminate number of participants (which can include infants and children) and an indeterminate number of pets is going to make a lot of noise. The Westin hotel is immediately adjacent to the Safe Parking site. The Euclid Square apartments at 249 N. Euclid Avenue is 286 feet from the closest Safe Parking's parking space (260 feet if measured parcel-line to parcel-line). The Maryland is on the other side of the church from the Safe Parking site.

Because of these far-from-negligible expansions of use and changes of use, the proposed Safe Parking project does not fall within the Class 1 CEQA exemption. (*See* 14 CCR 15301 [the CEQA exemption's "key consideration is whether the project involves negligible or no expansion of an existing use"].) The expansion in use will have significant negative environmental effects. An environmental analysis is therefore required. (*See Protect Niles v. City of Fremont* (2018) 25 Cal. App. 5th 1129, 1138–39 [citing CEQA Guidelines that if there is

⁸ Utah Department of Environmental Quality, "Some Common Myths: Be Idle Free" available here: <https://deq.utah.gov/air-quality/some-common-myths-be-idle-free>.

⁹ U.S. Dept. Energy, "Which Is Greener: Idle, or Stop and Restart?" available here: https://afdc.energy.gov/files/u/publication/which_is_greener.pdf

¹⁰ See, Exhibit C, showing current traffic volume on the relevant portion of Euclid.

“substantial evidence” in the whole record supporting a fair argument that a project may have a significant effect on the environment, the lead agency shall prepare an EIR, even though it may also be presented with other substantial evidence that the project will not have a significant effect, and noting that “may” means a reasonable possibility].)

The City may not approve the MCUP application at least until the City conducts an environmental review. (*See, e.g., Save Tara v. City of W. Hollywood* (2008) 45 Cal. 4th 116, 122 (2013) [environmental review must precede project approval]; 14 CCR 15004 [“Before granting any approval of a project subject to CEQA, every lead agency or responsible agency shall consider a final EIR or negative declaration or another document authorized by these guidelines to be used in the place of an EIR or negative declaration.”].) The Maryland’s appeal of the BZA’s determination must be granted, the BZA’s decision overturned, and All Saints’ application for MCUP #7318 denied.

3. The Safe Parking operation would make the neighborhood less safe.

The City’s Zoning Code requires, and the BZA found, that the proposed use will not be detrimental to the “health, safety, or general welfare of persons residing or working in the neighborhood.” (Zoning Code section 17.61.050(H)(4); BZA Decision Attachment A, Finding 4.) That finding was in error.

A. *All Saints should not be entrusted with this Safe Parking operation.*

While All Saints’ goal of sheltering the homeless is admirable, All Saints has knowingly violated conditions of approval for a similar permit, and thus should not be trusted to abide by the conditions imposed on this MCUP. All Saints in 2021 was granted CUP #6898 to operate its Safe Haven Bridge to Housing program. One of the conditions of approval is that “[a]t least one security guard shall patrol the subject property from 7:00 p.m. to 7:00 a.m., daily.” (See September 1, 2021, staff report to the Hearing Officer at page 12, condition 12. The Hearing Officer adopted the staff report.) Prompted by then-rector Kinman, the current applicant, Erica Tamblyn, publicly stated on recorded video that All Saints is violating this condition.¹¹ Applicant Tamblyn states that “we [All Saints] have reduced the security” and now rely on security guards stationed at City Hall

¹¹ See “03.08.24 - All-Saints Pasadena Safe Haven Bridge to Housing Ministry” at time-stamp 1:00:20 here: https://www.youtube.com/watch?v=h5M3_NLeijl&t=2987s.

who “come over a couple of times per night” except for “two nights a week that are like ‘hot’ nights—Friday night and Saturday night—when we have an officer there throughout the night.” This violates the condition of All Saints’ CUP. This admission by All Saints undermines any assumption that All Saints will abide by the condition of this MCUP to have a security guard on-site during all hours of operation of its Safe Parking program?¹²

Additionally, All Saints is already an attractive nuisance that cannot control what occurs on its property. Since 2020, All Saints has had *over 450 calls* for service from the Police Department, basically averaging a call every 4 days for 5.5 years. (See the Pasadena Police Department’s Call for Service Reports attached as Exhibit B.) If All Saints were treated like any other permit-holder or business, it would have been classified as a gross nuisance and closed down by the City years ago. Like a magnet attracting iron filings, the All Saints campus has drawn to it an agglomeration of troublemakers. This history belies All Saints’ claim that it can maintain a Safe Parking operation on its parking lot for twelve hours every day without degrading the safety of the neighborhood for our residents and workers, as well as for the customers who come to patronize the neighborhood’s businesses.

B. The future will resemble the past.

At a Maryland meeting to discuss the proposed Safe Parking operation, every member of The Maryland in attendance opposed the operation because it would make the neighborhood unsafe for residents and workers. Maryland residents base their opinion on past experience. Five years ago, All Saints permitted as many as 10 or more homeless individuals to camp under a tree south of its sanctuary. While the encampment was in place the following happened:

- Drug dealers loitered in the area to sell drugs to the homeless and to anyone else nearby. A Maryland resident on two occasions walked to the nearby courthouse for business. On both occasions he was solicited to buy drugs.

¹² All Saints applicant Tamblyn stated at the BZA hearing that All Saints did not realize it was violating its Safe Haven CUP, and that it now has a security guard present each night as is required. (See September 25, 2025 BZA hearing video starting at time-stamp 1:00:50.) Everyone can look at the earlier-cited video with Rector Kinman and Ms. Tamblyn and judge for themselves whether All Saints understood it was violating its permit. If you think they did understand, then All Saints appears to be coming into compliance with its Safe Haven CUP in order to receive its Safe Parking MCUP.

- On multiple occasions, members of the encampment and/or others drawn to the encampment shot up drugs on part of The Maryland's property adjoining Plaza Las Fuentes.
- On multiple occasions, members of the encampment and/or others drawn to the encampment shot up drugs and passed out on The Maryland's front steps.
- On multiple occasions, members of the encampment and/or others drawn to the encampment lit fires to do drugs on the green-space at the corner of Euclid and Union. The Maryland is worried that the trees there will catch fire and spread to The Maryland.
- On multiple occasions, we had to clean up human feces from Maryland property.
- The amount of trash in the area, especially food containers and beer and liquor bottles greatly increased.

The Maryland's experience is not unique. At the hearing before the Hearing Officer, a representative of the office tower at 301 E Colorado Blvd., across from City Hall, described similar problems:

- Homeless individuals lurk in his building's garage, which has made his security guards afraid to go at night into the lower levels of the tower's garage. (June 18, 2025 Hearing Officer hearing at time-stamp 1:04:18.)
- The tower also had to install a fence around the generator serving the Montana condominiums, located on the office tower's property, because of homeless people defecating behind it.

The problems Maryland residents and other residents and workers in the neighborhood experienced before will return.

At The Maryland homeowners' meeting at which the MCUP was discussed, residents stated that they do not walk during the evening near the old YWCA or YMCA because it is unsafe because of the presence of unstable individuals. Does the City really want to make the area more unsafe by concentrating more unstable homeless individuals into the Civic Center? The answer, we hope, is No.

C. A single security guard will not suffice.

The Maryland rejects—as should the Council—the BZA's determination that a single security guard will suffice to ensure that Safe Parking participants stay on-property and are not solicited by non-participants. The proposed Safe Parking

location is inherently insecure. There are multiple entry points for vehicles, and the northern boundary of Parcel 12 has a low cinder block wall.

A single security guard (or even two, though the proposed permit calls for only one) will not be able to secure 25 vehicles and an indeterminate number of individuals on a parking lot open to the public space on three sides. A representative of the Montana, a residential building at 345 E. Colorado Blvd., agreed that a single security office would be inadequate and that the proposed program is “a disaster waiting to happen.” (June 18, 2025 Hearing Officer hearing at time-stamp 49:55-50:55.)

D. Drug-use and -solicitation will increase in the neighborhood before and after Safe Parking hours.

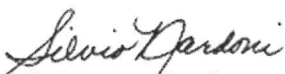
Even if the Safe Parking location were somehow secured during the night, drug dealers and users will be loitering in the area before and after the program hours. As a Maryland resident who is a licensed psychologist who has worked with homeless individuals testified at the June 18 Hearing Officer hearing, many homeless individuals, including those living in their cars, are drug-users with schizo-affective disorders. Realistically, here is what will happen: Before they drive onto the parking lot in the evening, some of the Safe Parking participants will park on Euclid or elsewhere in the vicinity to purchase and use drugs. After driving off of the parking lot in the morning, some of the Safe Parking participants will park on Euclid or elsewhere in the vicinity to purchase and use drugs. Other users who are not participants in the Safe Parking program will be attracted to the area because of the concentration of available drugs.

Because the proposed Safe Parking operation will make the neighborhood less safe, the Maryland’s appeal of the BZA’s determination must be granted, the BZA’s decision overturned, and All Saints’ application for MCUP #7318 denied.

We appreciate the City Council’s attention to this matter and anticipate that the Council will deny the application for a minor conditional use permit as sought in MCUP # 7318.

Respectfully,

The Maryland Homeowners Association


Silvio Nardoni

Corporate Secretary

Property Basics

OWNERSHIP

Primary Owner:	Rector Wardens & Vestry Of All	Secondary Owner:	Saints Church Of Pasadena
Mailing Address:	132 N Euclid Ave Pasadena, CA 91101		
Vesting:	-		
Legal Description:	LAND DESC AS PAR 1 IN DOC 1849462, 901101		

SALE & LOAN

Sale Amount:	\$0	Sale Date:	Not Available
Lender:	-	Loan type:	-
Document:	-		

ASSESSMENT & TAX

Value (Structure):	\$4,836,187	Value (Land):	\$883,657
Tax Amount:	\$6,486	Tax Area:	07-456
Exemption:	No	Percent Improved:	85
Value (Total):	\$5,719,844		

PROPERTY CHARACTERISTICS

Type:	1-2 Family Detached	Year:	1923
Sqft (Structure):	52,434	Sqft (Lot):	85,397
Rooms:	-	Stories:	1
Beds:	-	Baths:	-
Garage:	-		-
Number of Units:	-	Fireplace:	-

LAND RECORDS

Parcel/APN:	5723-017	County:	Los Angeles
Zoning:	PSC-		461902
Map Ref:	-		

Property Basics

OWNERSHIP

Primary Owner:	All Saints Church Of Pasadena	Secondary Owner:	Rector Wardens & Vestry Of
Mailing Address:	132 N Euclid Ave Pasadena, CA 91101		
Vesting:	-		
Legal Description:	SAN PASCUAL TRACT LAND DESC AS PAR 2 IN DOC 2111922,901224 POR OF LOT 7 BLK C		

SALE & LOAN

Sale Amount:	\$0	Sale Date:	Not Available
Lender:	-	Loan Type:	-
Document:	-		

ASSESSMENT & TAX

Value (Structure):	\$15,896	Value (Land):	\$1,874,476
Tax Amount:	\$8,657	Tax Area:	07-456
Exemption:	No	Percent Improved:	1
Value (Total):	\$1,890,372		

PROPERTY CHARACTERISTICS

Type:	Single-Family Residential	Year Built:	1980
Sqft (Structure):	21,312	Sqft (Lot):	22,226
Rooms:	-	Stories:	1
Beds:	-	Baths:	-
Garage:	-	Pool:	-
Number of Units:	-	Fireplace:	-

LAND RECORDS

Parcel/APN:	5723-017	County:	Los Angeles
Zoning:	PSC-	Tract:	-
Map Ref:	-		

Property Basics

OWNERSHIP

Primary Owner:	All Saints Church Of Pasadena	Secondary Owner:	Rector Wardens & Vestry Of
Mailing Address:	132 N Euclid Ave Pasadena, CA 91101		
Vesting:	-		
Legal Description:	SAN PASQUAL TRACT LOT COM W 192.5 FT AND N 240 FT FROM NE COR OF LOT 5 WM CONVERSE SUB TH N TO A PT S 55 FT FROM S LINE OF WALNUT ST TH W 67.5 FT TH N TO SD S LINE TH W THEREON AND S ON E LINE LINE TO BEG PART OF LOT 7 BLK C		

SALE & LOAN

Sale Amount:	\$3,992,000	Sale:	12/17/1990
	Sanwa Bank California	Loan Type:	CONVENTIONAL
Document:	1990.2111922		

ASSESSMENT & TAX

Value (Structure):	\$17,663	Value (Land):	\$1,856,790
Tax Amount:	\$20,217	Tax Area:	07-456
	No	Percent Improved:	1
Value (Total):	\$1,874,453		

PROPERTY CHARACTERISTICS

		Year:	1947
Sqft (Structure):	21,455	Sqft (Lot):	21,101
Rooms:	-	Stories:	1
Beds:	-	Baths:	-
Garage:	-	Pool:	-
of Units:	-	Fireplace:	-

LAND RECORDS

	5723-01	County:	Los Angeles
	PSC-		463601
Map Ref:	-		



Pasadena Police Department
Calls For Service Report

Pursuant to Section 7923.600 of the Government
code, information deemed non-releasable or
confidential has been blocked out or pages removed.

Generated by 6076 on 6/17/2025

Search Criteria: City: PA | Time Range: 01/01/21 00:01 - 05/31/22 23:59 | Agency: F,P | Address: 132 N EUCLID AV

Incident	A	Date	Time	Type	NOI	Unit	Dispo	Location
1PA0000873	P	01/04/21	11:21:43	459RA	BURGLARY ALARM	1L12	FALSE	132 N. EUCLID AV
1PA0002351	P	01/09/21	17:54:35	459RA	BURGLARY ALARM	2D5	CAN	132 N. EUCLID AV
1PA0004117	P	01/16/21	00:46:38	TRST	TRANSIENT	3A22	RES	132 N. EUCLID AV
1PA0004147	P	01/16/21	09:09:33	FB	FOOTBEAT	HP3	RES	132 N. EUCLID AV
1PA0004421	P	01/17/21	05:52:48	TRST	TRANSIENT		CAN	132 N. EUCLID AV
1PA0004782	P	01/18/21	12:47:31	243A	BATTERY	2L55	RES	132 N. EUCLID AV
1PA0006089	P	01/23/21	00:36:14	415M	TRST	3A31	RESH	132 N. EUCLID AV
1PA0007124	P	01/27/21	07:08:27	TRST	TRANSIENT	1L51	RES	132 N. EUCLID AV
1PA0007409	P	01/28/21	00:24:55	TRST	TRANSIENT	3L51	RES	132 N. EUCLID AV
1PA0009901	P	02/06/21	07:25:24	484A	PETTY THEFT	1L51	RES	132 N. EUCLID AV
1PA0009931	P	02/06/21	10:45:58	FNDPR P	FOUND PROPERTY	1L52	RPT	132 N. EUCLID AV
1PA0010164	P	02/07/21	03:19:10	TRST	TRANSIENT	3L51	RES	132 N. EUCLID AV
1PA0010373	P	02/08/21	00:31:23	TRST	TRANSIENT	3L52	RES	132 N. EUCLID AV
1PA0010402	P	02/08/21	07:33:15	TRST	TRANSIENT		CAN	132 N. EUCLID AV
1PA0010890	P	02/10/21	01:42:38	TRST	TRANSIENT	3L31	RES	132 N. EUCLID AV
1PA0011158	P	02/11/21	00:39:34	602	TRESPASS		DUP	132 N. EUCLID AV
1PA0011159	P	02/11/21	00:40:56	602	TRESPASS	3L21	RES	132 N. EUCLID AV
1PA0011169	P	02/11/21	02:05:45	314	INDECENT EXPOSUR	3L21	RES	132 N. EUCLID AV
1PA0011258	P	02/11/21	11:21:28	HSVIO L	CITE OUT	P63	RPT	132 N. EUCLID AV
1PA0011358	P	02/11/21	17:53:16	166-4	VIOL COURT ORDER	HP3	UNF	132 N. EUCLID AV
1PA0011387	P	02/11/21	19:03:09	TRST	TRANSIENT	2L55	RES	132 N. EUCLID AV
1PA0011443	P	02/12/21	01:28:30	TRST	TRANSIENT	3L51	RES	132 N. EUCLID AV
1PA0012043	P	02/14/21	00:22:54	TRST	TRANSIENT	3L12	RES	132 N. EUCLID AV
1PA0012058	P	02/14/21	03:58:15	925A	SUSP PERSON/VEH	3L51	RES	132 N. EUCLID AV
1PA0013011	P	02/17/21	15:33:06	HSVIO L	HEALTH & SAFETY	2A55	UTL	132 N. EUCLID AV
1PA0013210	P	02/18/21	03:05:42	TRST	TRANSIENT	3L11	GOA	132 N. EUCLID AV
1PA0014704	P	02/23/21	02:52:56	459RA	BURGLARY ALARM	3L51	FALSE	132 N. EUCLID AV
1PA0015020	P	02/24/21	00:39:20	TRST	TRANSIENT	3L52	RES	132 N. EUCLID AV
1PA0015347	P	02/25/21	01:07:46	TRST	TRANSIENT	3L52	RES	132 N. EUCLID AV
1PA0016897	P	03/01/21	20:47:43	459RA	BURGLARY ALARM	3L51	FALSE	132 N. EUCLID AV
1PA0017393	P	03/03/21	13:43:49	██████████	██████████	HP1	RES	132 N. EUCLID AV
1PA0018551	P	03/06/21	20:11:15	TRST	TRANSIENT	3L11	RES	132 N. EUCLID AV
1PA0018802	P	03/07/21	17:15:30	TRST	TRANSIENT	2A55	GOA	132 N. EUCLID AV
1PA0018810	P	03/07/21	18:04:22	TRST	TRANSIENT	2A55	GOA	132 N. EUCLID AV
1PA0019793	P	03/10/21	17:27:11	415M	415 MISC		CAN	132 N. EUCLID AV
1PA0019964	P	03/11/21	09:42:36	459RA	BURGLARY ALARM		CAN	132 N. EUCLID AV



Pasadena Police Department

Calls For Service Report

Generated by 6076 on 6/17/2025

Search Criteria: City: PA | Time Range: 01/01/21 00:01 - 05/31/22 23:59 | Agency: F,P | Address: 132 N EUCLID AV

1PA0019967	P	03/11/21	09:54:54	459RA	BURGLARY ALARM	1L21	CAN	132 N. EUCLID AV
1PA0020636	P	03/13/21	04:46:04	602	TRESPASS	3L52	RES	132 N. EUCLID AV
1PA0021318	P	03/15/21	15:35:15	TRST	TRANSIENT	2A55	RES	132 N. EUCLID AV
1PA0021441	P	03/16/21	00:11:48	TRST	TRANSIENT	3L51	RES	132 N. EUCLID AV
1PA0021971	P	03/17/21	16:05:02	415M	415 MISC	1L52	RES	132 N. EUCLID AV
1PA0022183	P	03/18/21	04:53:22	TRST	TRANSIENT	3L11	GOA	132 N. EUCLID AV
1PA0022531	P	03/19/21	03:32:12	602	TRESPASS	3L51	RES	132 N. EUCLID AV
1PA0022978	P	03/20/21	14:20:48	TRST	TRANSIENT	1L51	GOA	132 N. EUCLID AV
1PA0023566	P	03/22/21	10:59:35	415M	415 MISC	1L51	RES	132 N. EUCLID AV
1PA0024101	P	03/23/21	22:33:04	415M	415 MISC	3L52	RES	132 N. EUCLID AV
1PA0024151	P	03/24/21	04:04:15	415M	415 MISC	3A41	RPT	132 N. EUCLID AV
1PA0024152	P	03/24/21	04:16:28	SUPV	SUPERVISOR RQST	3S3	RES	132 N. EUCLID AV
1PA0025572	P	03/28/21	05:39:54	TRST	TRANSIENT		CAN	132 N. EUCLID AV
1PA0026443	P	03/31/21	00:19:33	TRST	TRANSIENT	3L51	RES	132 N. EUCLID AV
1PA0029869	P	04/10/21	05:16:46	FNDPR P	FOUND PROPERTY		CAN	132 N. EUCLID AV
1PA0031689	P	04/16/21	00:48:50	TRST	TRANSIENT	3L51	GOA	132 N. EUCLID AV
1PA0033286	P	04/21/21	06:19:24	TRST	TRANSIENT	1L52	RES	132 N. EUCLID AV
1PA0033871	P	04/23/21	00:10:32	415M	TRST		RES	132 N. EUCLID AV
1PA0034239	P	04/24/21	02:20:24	415M	415 MISC	3L51	RES	132 N. EUCLID AV
1PA0035203	P	04/27/21	07:33:54	TRST	TRANSIENT	1L52	RES	132 N. EUCLID AV
1PA0035209	P	04/27/21	07:53:36	TRST	TRANSIENT	1L52	RES	132 N. EUCLID AV
1PA0035247	P	04/27/21	10:30:34	TRST	TRANSIENT	1L52	RES	132 N. EUCLID AV
1PA0036514	P	05/01/21	00:39:58	415M	415 MISC	3L52	RES	132 N. EUCLID AV
1PA0036515	P	05/01/21	00:40:55	TRST	TRANSIENT	3L11	RES	132 N. EUCLID AV
1PA0037084	P	05/03/21	00:04:35	TRST	TRANSIENT	3L52	RES	132 N. EUCLID AV
1PA0037089	P	05/03/21	00:44:03	TRST	TRANSIENT	3L52	RES	132 N. EUCLID AV
1PA0037112	P	05/03/21	04:56:43	TRST	TRANSIENT	1L52	RES	132 N. EUCLID AV
1PA0037959	P	05/05/21	17:57:14	925	SUSP PERSON	2L55	RES	132 N. EUCLID AV
1PA0038088	P	05/06/21	06:52:38	TRST	TRANSIENT	1L51	GOA	132 N. EUCLID AV
1PA0039292	P	05/10/21	03:29:33	TRST	TRANSIENT	3A11	GOA	132 N. EUCLID AV
1PA0040491	P	05/14/21	01:24:57	TRST	TRANSIENT	3L52	RES	132 N. EUCLID AV
1PA0041168	P	05/16/21	03:40:28	TRST	TRANSIENT	3L11	RES	132 N. EUCLID AV
1PA0041170	P	05/16/21	04:02:18	TRST	TRANSIENT	3L11	RES	132 N. EUCLID AV
1PA0043129	P	05/22/21	00:54:37	TRST	TRANSIENT	3L52	RES	132 N. EUCLID AV
1PA0043183	P	05/22/21	08:23:57	243A	BATTERY	1L51	RES	132 N. EUCLID AV
1PA0044030	P	05/24/21	19:27:06	459RA	BURGLARY ALARM	3L51	FALSE	132 N. EUCLID AV
1PA0044123	P	05/25/21	06:37:14	TRST	TRANSIENT	1L12	RES	132 N. EUCLID AV
1PA0044124	P	05/25/21	06:48:16	TRST	TRANSIENT	1L32	RES	132 N. EUCLID AV
1PA0044414	P	05/26/21	07:45:57	TRST	TRANSIENT	1L52	RES	132 N. EUCLID AV



Pasadena Police Department

Calls For Service Report

Generated by 6076 on 6/17/2025

Search Criteria: City: PA | Time Range: 01/01/21 00:01 - 05/31/22 23:59 | Agency: F,P | Address: 132 N EUCLID AV

1PA0044680	P	05/26/21	23:16:44	TRST	TRANSIENT	3L52	RESH	132 N. EUCLID AV
1PA0045827	P	05/30/21	15:13:04	TRST	TRANSIENT	1L51	RES	132 N. EUCLID AV
1PA0046091	P	05/31/21	18:05:50	CHKW EL	CHECK WELFARE	2L55	UTL	132 N. EUCLID AV
1PA0050082	P	06/12/21	23:15:14	TRST	TRANSIENT	3L51	RES	132 N. EUCLID AV
1PA0050603	P	06/15/21	00:31:53	415FYT	415 FIGHT	3L51	RES	132 N. EUCLID AV
1PA0052213	P	06/20/21	07:16:03	TRST	TRANSIENT	1L51	RES	132 N. EUCLID AV
1PA0052236	P	06/20/21	10:46:07	██████	██████████	1A21	RES	132 N. EUCLID AV
1PA0054814	P	06/28/21	08:29:42	TRST	TRANSIENT	1L12	RES	132 N. EUCLID AV
1PA0056846	P	07/04/21	00:37:24	459RA	BURGLARY ALARM	3L11	CAN	132 N. EUCLID AV
1PA0056857	P	07/04/21	01:01:49	TRST	TRANSIENT	3A22	RES	132 N. EUCLID AV
1PA0074227	P	08/23/21	12:31:33	PMC	HU 1L51	1L51	UTL	132 N. EUCLID AV
1PA0075184	P	08/26/21	11:32:03	459RA	BURGLARY ALARM	1L52	RES	132 N. EUCLID AV
1PA0078821	P	09/06/21	07:47:30	459RA	BURGLARY ALARM	1L52	FALSE	132 N. EUCLID AV
1PA0081689	P	09/15/21	17:31:20	FNDPR P	FOUND PROPERTY	2A55	UTL	132 N. EUCLID AV
1PA0083845	P	09/22/21	15:20:55	TRST	POSS 484A/	1L51	GOA	132 N. EUCLID AV
1PA0086991	P	10/03/21	00:31:59	602	TRESPASS	3L51	RES	132 N. EUCLID AV
1PA0087221	P	10/03/21	22:40:33	TRST	TRANSIENT		CAN	132 N. EUCLID AV
1PA0087459	P	10/04/21	19:04:30	415M	415 MISC	3L12	CAN	132 N. EUCLID AV
1PA0088498	P	10/08/21	13:27:41	415M	415 MISC	1L51	RES	132 N. EUCLID AV
1PA0092343	P	10/21/21	09:46:56	FB	FOOTBEAT	HP2	RES	132 N. EUCLID AV
1PA0093653	P	10/25/21	09:32:16	TRST	TRANSIENT	1L52	RES	132 N. EUCLID AV
1PA0106568	P	12/05/21	08:54:01	TRST	TRANSIENT	1L52	GOA	132 N. EUCLID AV
1PA0111406	P	12/21/21	10:41:15	CHKW EL	CHECK WELFARE	HP2	UTL	132 N. EUCLID AV
2PA0002746	P	01/11/22	09:54:11	EXSER	EXTRA SERVICE	HP2	RES	132 N. EUCLID AV
2PA0005156	P	01/19/22	17:49:26	459SA	SIL BURG ALARM	2L55	FALSE	132 N. EUCLID AV
2PA0007037	P	01/25/22	11:22:56	FB	FOOTBEAT	HP2	RES	132 N. EUCLID AV
2PA0014050	P	02/16/22	16:53:38	487-1	GRAND THEFT	2L55	RES	132 N. EUCLID AV
2PA0014612	P	02/18/22	13:26:33	602	TRESPASS	1L52	RES	132 N. EUCLID AV
2PA0015487	P	02/21/22	11:32:24	484A	PETTY THEFT	1L51	UTL	132 N. EUCLID AV
2PA0016355	P	02/24/22	10:17:20	602	415 MISC	1L52	RES	132 N. EUCLID AV
2PA0020432	P	03/08/22	10:27:05	FB	FOOTBEAT	HP2	RES	132 N. EUCLID AV
2PA0021511	P	03/11/22	16:59:36	FNDPR P		3L51	RES	132 N. EUCLID AV
2PA0025298	P	03/23/22	16:02:22	415M	415 MISC	2L55	RES	132 N. EUCLID AV
2PA0026640	P	03/27/22	19:04:50	PUBAS T	PUBLIC ASSIST	3L52	RES	132 N. EUCLID AV
2PA0027058	P	03/29/22	11:53:09	484A	PETTY THEFT		RPT	132 N. EUCLID AV
2PA0032522	P	04/15/22	17:43:14	██████	██████	2L15	RPT	132 N. EUCLID AV



Pasadena Police Department

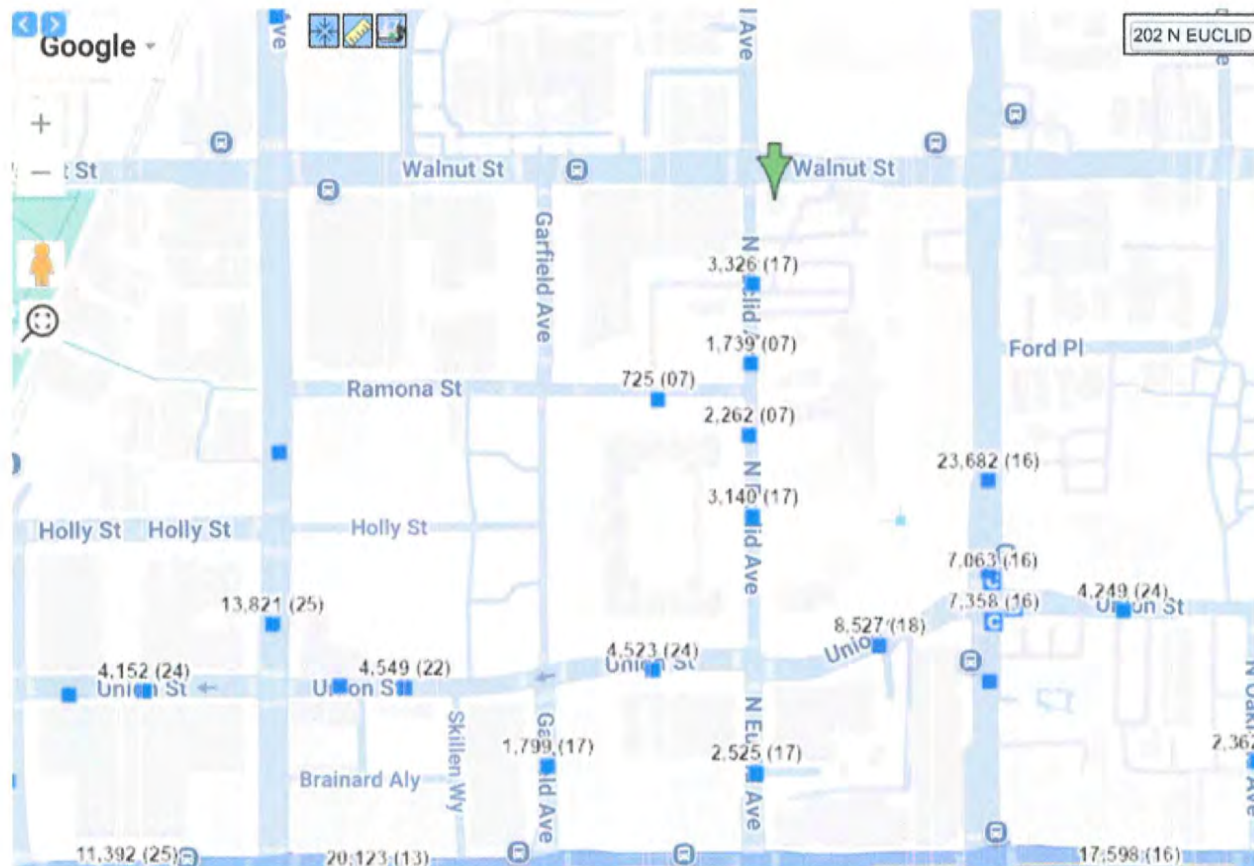
Calls For Service Report

Generated by 6076 on 6/17/2025

Search Criteria: City: PA | Time Range: 01/01/21 00:01 - 05/31/22 23:59 | Agency: F,P | Address: 132 N EUCLID AV

2PA0033749	P	04/19/22	14:37:34	459RA	BURGLARY ALARM	1L52	FALSE	132 N. EUCLID AV
2PA0033757	P	04/19/22	14:58:41	459RA	BURGLARY ALARM	2D1	CAN	132 N. EUCLID AV
2PA0033763	P	04/19/22	15:19:00	459RA	BURGLARY ALARM		CAN	132 N. EUCLID AV
2PA0033769	P	04/19/22	15:33:01	459RA	HU 1L52	1A21	FALSE	132 N. EUCLID AV
2PA0042214	P	05/16/22	08:03:18	PFDAS T	FIRE DEPT ASSIST		CAN	132 N. EUCLID AV

<https://pasadena.public.ms2soft.com/tcds/tsearch.asp?loc=Pasadena&mod=>



TRAFFIC VOLUME ON EUCLID BETWEEN WALNUT AND UNION

CITY OF PASADENA

GENERAL RECEIPT

RECEIVED FROM Silvio Nardoni The Maryland HOA DATE 10/6/2025
ADDRESS 80 N. Euclid Ave CITY Pasadena PHONE # 818 550-1800

☐ MUNICIPAL SERVICES - ACCOUNT # _____
☐ LICENSE _____
☐ PARAMEDIC - INV. # _____ INV. AMT. \$ _____
PAID THIS DATE \$ _____
BALANCE DUE \$ _____
☐ PARKING CITATIONS \$ _____
☒ OTHER 202 N Euclid Ave INV. AMT. \$ _____
MCUP # 7318
Zent 2025-00039
PAID THIS DATE \$ 1,124.31
BALANCE DUE \$ _____

AMT. PAID 1,124.31

CODE: _____

☐ CASH
☒ CHECK # 1449
☐ MONEY ORDER # _____

Sandra S. Robles
RECEIVED BY

NOTE: NOT A VALID RECEIPT UNLESS ENDORSED ABOVE BY REGISTER OR SIGNATURE

CASHIER—WHITE CUSTOMER COPY—CANARY OFFICE COPY—PINK
CTCK0013 (4/99)