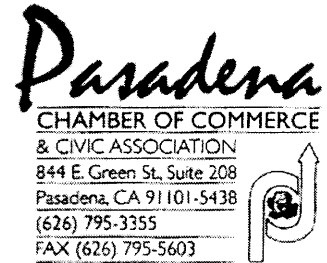


Stephanie DeWolfe
City of Pasadena
Department of Planning and Development
100 North Garfield Avenue
Pasadena, CA 91109



March 24, 2010

Re: General Plan Outreach Draft Report

Dear Ms. DeWolfe:

The Board of Directors of the Pasadena Chamber of Commerce appreciates the opportunity to comment, as a body, on the Draft Community Outreach Report from the General Plan Update Advisory Commission. We also are encouraged that our President and CEO Paul Little sits as a member of the committee.

Before focusing on the report, you should be aware that many in the business community in Pasadena view the General Plan revision process with some measure of skepticism. They are concerned that resident interests will dominate the discussion with little or no consideration to the economic foundation of Pasadena, our employment base or the significant financial contribution Pasadena's commercial sector makes to the well being of our city.

The Chamber Board does have some specific concerns about the report, as presented currently, and some more general concerns about the overall approach, as illustrated by the report.

Here are the comments of the Board of the Pasadena Chamber of Commerce about the overall General Plan revision process:

- We seem to be approaching the revision as if there is not an existing, functional general plan. The 1994 plan, though certainly in need of updating, should not be jettisoned completely. Many of the elements of the existing plan remain valid and serve the City of Pasadena well. The Chamber Board would prefer a careful analysis of the existing plan and zoning code, followed by an examination of those elements that continue to serve Pasadena well and an updating of those portions that require changes to meet the evolving needs of our community.
- The report largely ignores the harsh reality of our current economy. In planning for Pasadena's future, there is a basic need for an analysis of Pasadena's current economy as well as short and long term economic

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projections. Absent a plan for Pasadena's commercial and economic future, the revised general plan does not have the foundation necessary to be effective. An excellent quality of life in Pasadena's neighborhoods and a thriving economy require an understanding of how each can be achieved and at what cost. A thorough economic analysis will allow Pasadena's leaders to incentivize investment where it is appropriate to create a city that thrives for all its stakeholders. Such an analysis would allow considered and careful examination of our local economy followed by a plan for our commercial future. Pasadena also needs to focus realistically on economic planning, especially contingency planning for times of economic stress.

- From this point on, the effort will require the services of consultants who are expert in land use and mobility, as well as economic analysis, to support the work of City planning and transportation staff. Absent an expenditure for necessary professional support, the General Plan revision process will not progress to a conclusion in a reasonable amount of time, and certainly not in a timeframe that could have a positive impact on Pasadena's immediate economic condition and finances.
- The Plan needs to move forward as quickly as possible. The City of Pasadena needs a revised general plan in place soon so that investment and investors can understand what is allowed here, where development and investment may occur and what sort of commercial activity is allowed, what is encouraged and what could possibly be incentivized. Delay in implementing the revised plan only translates into delay in investment in Pasadena's economy.
- We also note that very important Pasadena institutions, such as the Tournament of Roses have not been involved in any meaningful way up to this point.

These are the Board's comments relative to the General Plan Outreach report:

- The report contains troubling generalizations. For example, the report uses the terms participants, community and people when it is actually referencing residents. The comments therefore are characterized as universal, when in fact they are really those of only one segment of the persons queried and comments gathered. Further, the 66 residents who filled out the Move About booklets are given significant weight in the report, by virtue of consistent references to their responses, so that 2% of the responses seem to be much more influential than the response rate warrants. Generalizing responses as if they are universal and consensual gives a very false impression of unanimity of opinion. It is resident concerns that dominate the report and the report should state that clearly.

- It could help to clarify the report if it were clearly stated how many residents were involved, how many non-profit representatives and how many business people. It would also help if it were clearly delineated who serves on the General Plan Update Advisory Committee and what organizations, commissions and constituencies they represent. Our representative, Paul Little, is the CEO of the Chamber, serves on the Rose Bowl Operating Company and is a former councilmember, for example.
- Commercial stakeholders are largely ignored, even when they provided comment and input. When the report references the economy, it is from the perspective of resident remarks concerning vacant store fronts in the Central District. As another example, traffic is called out as a significant concern, yet was barely mentioned in meetings with commercial stakeholders. Traffic remains almost an exclusively resident issue, and not even one that all residents mentioned as a problem. As another example, residents in the Central District and east Pasadena, along with their commercial counterparts, all expressed the view that not enough on-site parking is incorporated into commercial buildings, yet that is not mentioned in the report.

The Pasadena Chamber of Commerce Board of Directors strongly urges the City of Pasadena to update the Economic Development and Employment element of the General Plan as part of the current update process. The Chamber Board favors a measured approach that examines the current condition of our economy, realistically projects what we can expect if we maintain the status quo and formulation of a plan for growth for the future.

The Chamber of Commerce Board of Directors continues to appreciate being involved in the general plan update process and encourages the City Council and staff to make a more aggressive effort at ensuring Pasadena's commercial and economic interests are considered and incorporated appropriately.

We also note that it is very difficult to determine exactly how, in what form, and to who anyone is to submit comments on the outreach report. There is no easily accessible and coherent link from the City's main home page to the report. Once one finds the report online the comment links are not working and there is no individual, office, or address identified as a place to submit written remarks.

Thank you for providing the opportunity to comment on this report.

Sincerely,



Ray Serafin
Chair of the Board of Directors