



## GABRIELENO BAND OF MISSION INDIANS - KIZH NATION

Historically known as The San Gabriel Band of Mission Indians

Recognized by the State of California as the aboriginal tribe of the Los Angeles basin

Dear Edward Lara, P.E.  
Principle Engineer

**Subject:** Mitigated Negative Declaration for the City of Riverside CA located on Main St. between Tenth St. and Eleventh St.

"The project locale lies in an area where the Ancestral & traditional territories of the Kizh(Kitc) Gabrieleno villages, adjoined and overlapped with each other, at least during the Late Prehistoric and Protohistoric Periods. The homeland of the Kizh (Kitc) Gabrielenos, probably the most influential Native American group in aboriginal southern California (Bean and Smith 1978a:538 <https://nrmsecure.dfg.ca.gov/FileHandler.ashx?DocumentID=9497>), was centered in the Los Angeles Basin, and reached as far east as the San Bernardino-Riverside area. The homeland of the Serranos was primarily the San Bernardino Mountains, including the slopes and lowlands on the north and south flanks. Whatever the linguistic affiliation, Native Americans in and around the project area exhibited similar organization and resource procurement strategies. Villages were based on clan or lineage groups. Their home/ base sites are marked by midden deposits, often with bedrock mortars. During their seasonal rounds to exploit plant resources, small groups would migrate within their traditional territory in search of specific plants and animals. Their gathering strategies often left behind signs of special use sites, usually grinding slicks on bedrock boulders, at the locations of the resources. Therefore, in order to protect our resources, we're requesting one of our experienced & certified Native American monitors to be on site during any & all ground disturbances (this includes but is not limited to pavement removal, pot-holing or grubbing, weed abatement, auguring, boring, grading, excavation and trenching).

In all cases, when the NAHC states there are "No" records of sacred sites" in the subject area; they always refer the contractors back to the Native American Tribes whose tribal territory the project area is in. This is due to the fact, that the NAHC is only aware of general information on each California NA Tribe they are "NOT" the "experts" on our Tribe. Our Elder Committee & Tribal Historians are the experts and is the reason why the NAHC will always refer contractors to the local tribes.

In addition, we are also often told that an area has been previously developed or disturbed and thus there are no concerns for cultural resources and thus minimal impacts would be expected. I have two major recent examples of how similar statements on other projects were proven very inadequate. An archaeological study claimed there would be no impacts to an area adjacent to the Plaza Church at Olvera Street, the original Spanish settlement of Los Angeles, now in downtown Los Angeles. In fact, this site was the Gabrieleno village of Yangna long before it became what it is now today. The new development wrongfully began their construction and they, in the process, dug up and desecrated 118 burials. The area that was dismissed as culturally sensitive was in fact the First Cemetery of Los Angeles where it had been well documented at the Huntington Library that 400 of our Tribe's ancestors were buried there along with the founding families of Los Angeles (Pico's, Sepulveda's, and Alvarado's to name a few). In addition, there was another inappropriate study for the development of a new sports complex at Fedde Middle School in the City of Hawaiian Gardens could commence. Again, a village and burial site were desecrated despite their mitigation measures. Thankfully, we were able to work alongside the school district to quickly and respectfully mitigate a mutually beneficial resolution.

Given all the above, the proper thing to do for your project would be for our Tribe to monitor ground disturbing construction work. Native American monitors and/or consultant can see that cultural resources are treated appropriately from the Native American point of view. Because we are the lineal descendants of the vast area of Los Angeles and Orange Counties, we hold sacred the ability to protect what little of our culture remains. We thank you for taking seriously your role and responsibility in assisting us in preserving our culture.

With respect,

Please contact our office regarding this project to coordinate a Native American Monitor to be present. Thank You

Andrew Salas, Chairman  
Albert Perez, treasurer I

Nadine Salas, Vice-Chairman  
Martha Gonzalez Lemos, treasurer II

Christina Swindall Martinez, secretary  
Richard Gradias, Chairman of the council of Elders

Andrew Salas, Chairman  
Cell (626) 926-4131

Addendum: clarification regarding some confusions regarding consultation under AB52:

AB52 clearly states that consultation must occur with tribes that claim traditional and cultural affiliation with a project site. Unfortunately, this statement has been left open to interpretation so much that neighboring tribes are claiming affiliation with projects well outside their traditional tribal territory. The territories of our surrounding Native American tribes such as the Luiseno, Chumash, and Cahuilla tribal entities. Each of our tribal territories has been well defined by historians, ethnographers, archaeologists, and ethnographers – a list of resources we can provide upon request. Often, each Tribe as well educates the public on their very own website as to the definition of their tribal boundaries. You may have received a consultation request from another Tribe. However we are responding because your project site lies within our Ancestral tribal territory, which, again, has been well documented. What does Ancestrally or Ancestral mean? The people who were in your family in past times, Of, belonging to, inherited from, or denoting an ancestor or ancestors <http://www.thefreedictionary.com/ancestral>. . If you have questions regarding the validity of the “traditional and cultural affiliation” of another Tribe, we urge you to contact the Native American Heritage Commission directly. Section 5 section 21080.3.1 (c) states “...the Native American Heritage Commission shall assist the lead agency in identifying the California Native American tribes that are traditionally and culturally affiliated with the project area.” In addition, **please see the map below.**

CC: NAHC

APPENDIX 1: Map 1-2; Bean and Smith 1978 map.

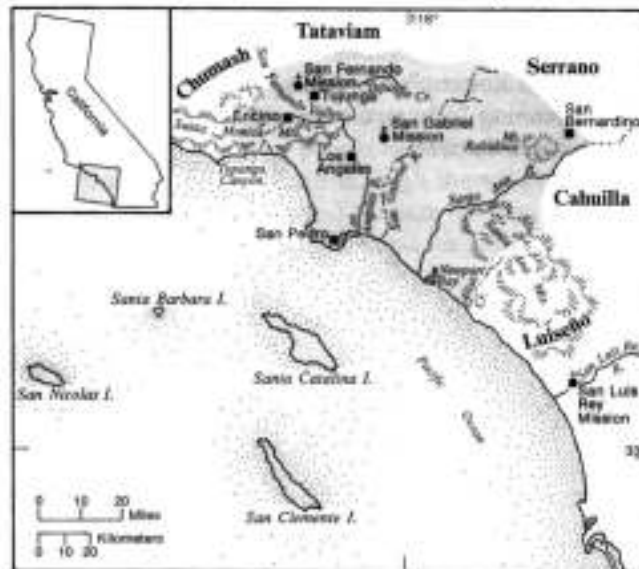


Fig. 1. Tribal territory.

The United States National Museum's Map of Gabrieliño Territory:

Bean, Lowell John and Charles R. Smith  
1978 Gabrieliño IN Handbook of North American Indians,  
California, Vol. 8, edited by R.F. Heizer, Smithsonian  
Institution Press, Washington, D.C., pp. 538-549

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**SUPERIOR COURT OF CALIFORNIA  
COUNTY OF RIVERSIDE**

CHAMBERS OF  
**BECKY DUGAN**  
PRESIDING JUDGE

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RIVERSIDE, CALIFORNIA 92501  
(951) 777-3162  
FAX (951) 777-3127

February 27, 2017

Mr. Edward Lara, P.E., Principal Civil Engineer  
City of Riverside, Engineering Division  
3900 Main Street, 4<sup>th</sup> Floor  
Riverside, CA 92522

RE: Pedestrian Mall Extension at Main Street  
Case. No. P16-0828

**RECEIVED**  
**FEB 27 2017**  
City of Riverside  
Public Works Department

Dear Mr. Lara:

As Presiding Judge of the Riverside Superior Court, I write on behalf of all of our judges, court staff, attorneys and court users to express our concern and dismay that neither the "Mitigated Negative Declaration Study" nor the "Downtown Parking Strategic Plan" even mention the courts and the more than 3000 people per day who use them, especially the disabled people who will have no place to park, other than to say that the Civil Court is a "historic building." A fair argument could be made that there are specific environmental impacts which have not been addressed. We have added an attachment to this letter which details those impacts.

The Study disingenuously refers to the loss of only 42 parking spaces directly in front of the courthouse (there are actually 45). It fails to mention the loss of another 73 parking spaces with the build-out of two parking lots adjacent to 11<sup>th</sup> street. All of the people who regularly park there will have to park somewhere else. Further, we are told there is adequate parking "within a short walking distance."

Our Civil court includes courtrooms that handle Probate and Unlawful Detainers. As just a small example, Probate deals with the elderly, mentally ill and families in guardianships. Many of these people are severely disabled and have to be helped by others who escort them. They cannot be dropped off near the court while the driver looks for parking. Our criminal courtrooms start at 8:30 AM and are packed with hundreds of defendants and jurors, many who fear a warrant issuing if they fail to appear on time.

The only answer the City has for the above problems is to raise the parking rates around the "Justice Center." The traffic study refers to a Stakeholders meeting to which the Court was never invited and is not even mentioned, although the extension of the pedestrian mall directly effects the courts more than any other stakeholder.

Further, the "Mitigated Negative Declaration" does not even mention court operations when discussing such impacts as noise or the effect on public service. Those sections amazingly list "no potentially significant impact." I am sure we could tolerate the temporary noise and pollution created by the construction, but there is no consideration whatsoever to the noise, trash, congestion, lack of public bathrooms and lack of parking created permanently by the project itself.

On page 41, section 18b., there is a catchall question designed to assess cumulative impacts of individual factors. Other than re-hashing traffic flow concerns, it does not mention or address that three operating courthouses will be daily affected by this closed street directly in front of them. Here, in this section, one would think that noise, congestion, trash, security, public bathrooms and access might be addressed. Instead, one wouldn't even know this pedestrian extension was near a courthouse, let alone three courthouses.

The City of Riverside owes much more to its court users than is reflected in these pages. The city has the right to build this extension if it chooses. However, we should be able to expect that our disabled, our jurors, our staff, our attorneys, and all the litigants that are mandated to appear in court be able to access our buildings and find parking for their vehicles without walking blocks. Further, we are very concerned that without security protecting our courthouses, significant damage will be done to the building and landscaping as people congregate to eat and to socialize, especially in the night time hours when court is closed and there are fewer eyes to observe misbehavior.

We take our partnerships with the City and County seriously and respect our boundaries. We have always been willing to work together to reach a fair solution to problems. Our justice partners, District attorney Michael Hestrin, Public Defender Steve Harmon and Probation Chief Mark Hake, have authorized me to inform you that they share in the court's concerns and objections. We all look forward to arriving at an appropriate resolution for our citizens who must access the Justice Center. However, we strongly object to the "Mitigated Negative Declaration" that has currently been submitted for approval.

Sincerely,

A handwritten signature in black ink, appearing to read "B L Dugan", with a stylized flourish at the end.

Becky L. Dugan  
Presiding Judge

Attachments

Attachment to Riverside Superior Court's Objection to the City of Riverside's draft Mitigated Negative Declaration concerning the Pedestrian Mall Extension, Main Street, Riverside

The Riverside Superior Court submits that the draft Mitigated Negative Declaration dated February 7, 2017, and the Initial Study upon which it is based, are legally defective. Contrary to the conclusion of the declaration, the facts demonstrate that a fair argument can be made that, despite the mitigation measures to be required by the City, the project will have a significant effect on the environment. Therefore, a mitigated negative declaration is improper, and an environmental impact report is legally required.

The specific impacts that justify an EIR include the following:

Air Quality (Section 3)

In both subsections 3b and 3c, the Initial Study concludes that the closure of this block of Main Street to vehicular traffic will not have a significant impact on air quality by relying on the following: "The proposed project would not generate additional vehicular trips; rather, vehicles would be redirected onto existing surrounding roadways, thereby emitting similar mobile source emissions into the surrounding environment compared to existing conditions." That statement is false.

While it is true that the traffic will be redirected onto other streets, the emissions resulting from that traffic will be greater than existing conditions. The project involves the elimination of 45 parking spaces from the five-courthouse Justice Center. As set forth in more detail below (see Transportation/Traffic, *infra*), those parking spaces are the ones most convenient to citizens going to the Historic Courthouse, and accordingly are in high demand. The City concedes that the elimination of those spaces will cause citizens with business at the courthouses in the Justice Center, and especially at the Historic Courthouse, to spend much more time circling the Justice Center, looking for open parking spaces. (Initial Study, p. 31, "Project Circulation Changes.") That additional low-speed mileage will inevitably increase the resulting emissions above existing levels.

The proposed mitigated negative declaration offers no measures to attempt to mitigate this impact. To the contrary, the related "Chow Alley" project will eliminate several parking lots, thereby increasing the shortage of available parking in the Justice Center and rendering the additional emissions that much greater.

Noise (Section 12)

In subsections 12a and 12d, the Initial Study concedes that the construction of the project will result in "a temporary increase in noise levels," but dismisses the impact of that noise on the ground that construction activities will "occur between the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday" and shorter hours on Saturdays. Far from rendering the impact of that construction noise insignificant, the timing of the construction activity directly impacts the operations of the adjacent courthouses. While the resulting noise may not exceed the city's noise ordinance, it is far from insignificant.

Directly adjacent to the entire length of the project is the Historic Courthouse. The Hall of Justice and the Family Law Courthouse are just feet away from the southerly end of the project. Within those three courthouses, 39 courtrooms are engaged in hearings in civil, probate, criminal, and family law matters between the hours of 8:00 A.M. and 5:00 P.M., the very hours during which construction will be occurring. The noise resulting from that construction will directly interfere with the operations of those courtrooms and of the Riverside Superior Court in general, and will impair the Court's ability to serve the public. Loud machinery will especially impact hearings and trials within the Historic Courthouse, given its close proximity to the project.

Nor is the impact limited to the period of construction. If the adjacent Chow Alley project is as successful as the city hopes, noise will be a continuing factor as people congregate directly outside the Historic Courthouse and socialize. To the extent that socialization is occurring during working hours, it will be during the same time that judges and jurors are trying to listen carefully to testimony and argument inside the Historic Courthouse.

Because the Initial Study fails to acknowledge that the impact of noise from the project on the court operations will be significant, no mitigation measures are proposed to lessen that impact. Without mitigation, a fair argument can be made that the noise impact will be significant.

#### Public Services (Section 14)

Subsection 14e incorrectly finds that the project will not increase the demand for governmental services or facilities. It will, to the contrary, result in an increase in the demand for public restroom facilities. Nevertheless, no such facilities are provided by the project.

The project is designed to create a space in which people will take food purchased from the vendors in the adjacent Chow Alley project, sit at tables located in the former street to eat, drink, and otherwise socialize. But no public bathrooms are planned, either as part of this project or as part of the concurrent Chow Alley project. Therefore, the only places that the public will have to go to the bathroom will be the restrooms in the adjacent court buildings. Their entries into those facilities for that purpose will add to the crowd going through the Court's security checkpoints, delaying court operations further.

Moreover, after the close of the courthouses at the end of the work day, there will be no access to any public restrooms, increasing the likelihood that people will relieve themselves on the courthouse landscaping under cover of darkness.

More generally, and more fundamentally, the Initial Study fails to recognize that the Historic Courthouse is a working courthouse, not an attractive but empty building. To deliver justice, a courthouse must be readily accessible to those needing the protection of the law and the courts. When conservators must park a distance away with their conservatees, and must walk for blocks while trying to control the behaviors and bathroom functions of their wards, merely in order to provide seating for a collection of restaurants, adequate public services are not being provided. When a person seeking a restraining order must walk for blocks, subject to harassment or violence from the person whose behavior may need restraining, adequate public services are not being provided. When victims of crimes, and witnesses for the prosecution, must walk the gauntlet for several blocks, at risk of harassment or violence from those who may be allied with the lawbreaker, adequate public services are not being provided.

Access to justice involves more than merely the right to be heard in court. It also requires that there be no physical barriers to entering a courthouse. For many users of the courts, the elimination of available parking will create exactly such a physical barrier.

Because the Initial Study fails to acknowledge that the impact of the project on both court users and court operations will be significant, no mitigation measures are proposed to lessen that impact. Without mitigation, a fair argument can be made that the impact on the Court's ability to provide justice services will be significant.

#### Transportation/Traffic (Section 16)

Subsection 16a states that the project will result in the elimination of 42 parking stalls. This is incorrect. There are 45 parking stalls on this block of Main Street, not 42. All 45 will be eliminated by the project. Although the Initial Study concludes that mitigation measures will render the impact of the loss of those 45 spaces insignificant. It is mistaken. Not only are those parking spaces not replaced elsewhere, the proposed mitigation measures worsen the problem.

Parking spaces around the courthouses are in very high demand. Indeed, the Initial Study itself acknowledges that the section of Main Street to be eliminated by the project "is primarily accessed by motorist [*sic*] searching for parking near the Superior Court of California – Riverside County." (Page 31.) It also states that an average of 1,851 vehicles travel that block of Main Street every day. (*Ibid.*) Therefore, at least 926 vehicles per day are on that street searching for parking.

The City also admits that, although the average on-street parking rate was only 40 percent for the downtown area as a whole (Report dated 1-24-17 re Downtown Strategic Parking Plan [hereinafter, "Parking Report"], p. 2), "[t]he justice center experiences very high demand during regular weekdays" (*id.*, p. 5; and see Initial Study, p. 31 ["high parking demand" for spaces adjacent to the Riverside Superior Court courthouses]). Similarly, the City's Strategic Parking Plan found that the blocks around the three state courthouses showed the highest parking demand during the morning in the entire downtown area, with occupancy rates of over 85%. (City of Riverside 2016 Strategic Parking Plan [hereinafter, "Parking Plan"], p. 13.) This high level of demand for parking on this block, and other streets in the immediate vicinity of the courthouses, is confirmed by the fact that the City charges higher rates for parking in the Justice Center than it does at parking meters in other areas of downtown. (Parking Report, p. 7.)

Despite the City's acknowledgment that there is very high demand for parking adjacent to the courthouses, and despite the City's concession that those "parking resources will be impacted" by this project and the related Chow Alley project (Parking Report, p. 5), the project offers no replacement parking spaces or other form of mitigation. Instead, the City proposes to make the impact even worse by proposing mitigation measures that eliminate more parking stalls and change the nature of others. Mitigation Measure Traf-1 will result in the elimination of 6 more parking stalls, bringing the total loss to 51. In addition, MM Traf-1 will result in the conversion of 9 angled parking stalls to parallel parking stalls. Parallel spaces cannot be used for handicapped spaces.

The result of the elimination of those spaces will be the elimination of any parking for disabled users of the Court. In addition to people with disabilities, drivers who are taking the



disabled, the mentally ill or infirm, or children to court appearances will have no parking close to the courthouses and no safe place to deliver people who do not drive.

The impact of the loss of 51 spaces by this project is compounded by the impact of other losses of parking resulting from other current development projects in the downtown area. The City's own Parking Report (at p. 3) and Parking Plan (at p. 19) list the following additional losses:

- 90 spaces eliminated by the closure of Lot 19 on Market Street between 10<sup>th</sup> and 11<sup>th</sup> Streets to accommodate Chow Alley.
- 58 spaces eliminated by new and expanded RTA bus stops on Market, Lemon, and University.
- 29 spaces eliminated by the closure of Lot TW to accommodate the Imperial Hardware Loft project.
- 37 spaces likely to be eliminated by the closure of Lot 27 at Lemon Street and Mission Inn Avenue.
- 36 spaces likely to be eliminated by the closure of Lot 46 in 2017.
- 91 spaces likely to be eliminated by the closure of Lot 42 in 2017.

The cumulative result will be that drivers trying to get to other parts of downtown will be vigorously competing for the few parking spaces that would remain in the Justice Center after the elimination of the nearby 51 spaces.

The potential for delay in court proceedings cannot be overstated. A court hearing cannot commence until all the parties and witnesses arrive. No judicial officer wants to issue a warrant, or default a party, or postpone a case because a litigant or a witness cannot find parking. Riverside Superior Court is already the most under-resourced court in the entire state, and our calendars are huge. Any delay impacts the court – and the litigants and witnesses waiting for their cases to be called – negatively.

Despite the magnitude of the impact, the Initial Study does not acknowledge in any way whatsoever the deleterious effects of the loss of parking, and thus offers zero mitigation measures. In particular, the Initial Study does not explain where the drivers of the cars that would otherwise park in the 51 spaces eliminated by the project can find alternative parking within a reasonable (two-block) radius of the Historic Courthouse.

The elimination of so many parking spaces will also affect traffic. The traffic study is very detailed, but it is based upon false assumptions, because it does not recognize the unique clientele of a courthouse and the importance of allowing that clientele to park close to the courthouse. Many persons who come to court have never been to a courthouse before, and tend to drive around in order to figure out which of the courthouses is the correct one for their case. When a person who seeks to attend the first court hearing in her divorce (or her civil lawsuit, or her parents' estate case, or the criminal case in which she is to testify) is circling all the tall buildings wondering which is the right one, and wondering where to park, that visit should count as three "trips," not one. Further, the traffic study does not adequately take into account the effect of the numerous projects now under construction or in planning, which will increase traffic downtown while eliminating hundreds of existing parking spaces. When people drawn by those



other projects cannot find parking, they will be circling the block looking for a space, and that will certainly aggravate the traffic situation.

For all of these reasons, a fair argument can be made that the impact on traffic and parking will be significant, and that the two mitigation measures proposed will not reduce that impact to insignificance.

#### Mandatory Findings of Significance (Section 18)

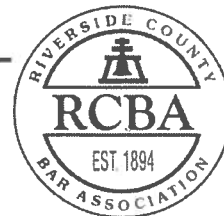
Subsection 18b concerns project impacts that are individually limited but cumulatively significant, especially when viewed in connection with the effects of other current projects. It is here that one would expect the Initial Study to present a discussion of and plan to mitigate the impact of the trash, noise, congestion, and security risks to the Courts that would flow from this project, especially when viewed in the context of Chow Alley. Yet again, however, the Court is not mentioned at all. Indeed, Chow Alley, which this project is designed to facilitate, is barely mentioned. The Initial Study does not begin to address the cumulative effects of the two projects on the Riverside Superior Court or the environment surrounding the three state courthouses in the Justice Center.

#### Conclusion

For all the reasons stated above, the Riverside Superior Court submits that the draft Mitigated Negative Declaration, and the Initial Study upon which it is based, are legally defective. Contrary to the conclusion of the draft declaration, the facts support a fair argument that, despite the mitigation measures to be required by the City, the project will have a significant effect on the environment. Therefore, a mitigated negative declaration is improper. The City must either revise the project to reduce those impacts to a level of insignificance or prepare an environmental impact report.

# Riverside County Bar Association

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February 28, 2017

Mr. Edward Lara, P.E. Principal Civil Engineer  
City of Riverside, Engineering Division  
3900 Main Street, 4<sup>th</sup> Floor  
Riverside, CA 92522

Dear Mr. Lara,

I am writing on behalf of the Riverside County Bar Association and its members, in response to the Pedestrian Mall Extension at Main Street – “Chow Alley.” I have had the opportunity to review the Mitigated Negative Declaration Study as well as the Downtown Parking Strategic Plan. The Bar Association representatives have had several meetings and conversations with City officials,, including Mayor Bailey and Emilio Ramirez. Also, Councilman Mike Gardner has spoken to the Board of Directors and to the Bar Advocacy Committee. We greatly appreciate your time in listening to our concerns. We wanted to summarize them again here.

As you know, the Association owns and occupies the building located at 4129 Main Street and, in addition to having our offices located there, we provide office space for the Public Defender’s Office, private attorneys, Riverside Legal Aid, and others. Our tenants rely on parking, not only for themselves and their staff, but for prospective clients and members of the public whom use our services.

When Councilman Gardner met with the Board last week, he explained that the project has not jelled yet in terms of what its final effect on parking near and around our building will look like. I was not able to attend that meeting, but I understand that Councilman Gardner was thorough and straightforward in his presentation. We remain concerned, however, and we would like to be part of the conversation concerning the project as it moves ahead. Councilman Gardner has stated he is willing to be a point of contact for us and we appreciate his assistance. Please keep us, as well as the other businesses in this area, in mind. If we were to lose 118 parking spaces nearby it could truly cause a severe injury to our ability to attract tenants and to be of service to the downtown area, the greater Riverside community and the surrounding environs.

Also, several members still have security concerns about Chow Alley. Again Councilman Gardner has assured us that Chow Alley may well result

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City of Riverside  
Public Works Department

in improved security due to the increase in business and foot traffic which the project hopes to affect. Again, we just want to be part of that conversation.

I urge the City to remember the impact this Project will have on the Bar Association, as well as other businesses in the downtown area should these concerns (parking & security) not be properly addressed.

Sincerely,

A handwritten signature in black ink, appearing to read "Jean Serrano", written in a cursive style.

Jean-Simon Serrano  
President



March 15, 2017

Mr. Edward Lara, P.E.  
Principal Civil Engineer  
City of Riverside  
Public Works Department  
3900 Main Street  
Riverside, CA 92522

Re: Objection to Resolution No. 23131  
Extension of Pedestrian Mall to Eleventh Street

Dear Mr. Lara:

Provident Bank is writing in connection with the above mentioned Resolution (to extend the Pedestrian Mall more commonly known as "Main Street Riverside" Pedestrian Mall from Sixth Street and Tenth Street to Eleventh Street). We wish to strongly object to the extension development of this Pedestrian Mall.

Provident Bank has been in Riverside for over 60 years and in downtown Riverside for 20 years with great success. Our Office is located at 4001 Main Street, in the heart of this proposed extension to the Pedestrian Mall.

After full review of Resolution 23131, the proposed Pedestrian Mall is particularly ill considered as the extension from Tenth Street to Eleventh Street is the street frontage to the Court House and our Office which are not industries consistent with the current Pedestrian Mall. Furthermore, the security of our personnel and customers is of the utmost importance and we are concerned that public safety officials would be hindered by the extension. Additionally, the extension takes up vital parking which will impact our customer base and others, potentially resulting in loss of business for Provident Bank.

Furthermore, there is no need for this kind of open market Pedestrian Mall as it appears the current Pedestrian Mall is sufficient.

Please accept this letter as our formal protest and objection to said establishment and extension of the Pedestrian Mall. We would like to be heard on March 28<sup>th</sup>, 2017 during the 3:00 PM hour.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Blunden".

Craig G. Blunden  
Chairman and Chief Executive Officer



3756 Central Avenue, Riverside, CA 92506 Tel: (800) 442-5201

