

**THE VIRGINIA ROBINSON GARDENS**

Environmental Impact Report      June 10, 1980

# EXHIBIT "B"

NOV-06-1992 10:37 FROM ARBORETA & BOTANIC GARDEN TO

12136265578 P.02



STEPHEN J. KOONCE  
COUNTY ENGINEER

RAYMOND W. LOOMIS  
Assistant County Engineer

COUNTY OF LOS ANGELES  
DEPARTMENT OF COUNTY ENGINEER-FACILITIES  
550 SOUTH VERMONT, LOS ANGELES, CA 90020

(213) 738-2011



BOARD OF SUPERVISORS

PETER F. SCHABARUM  
KENNETH HAHN  
EDMUND D. EDELMAN  
VIGORINE BRATHWAITE BURKE  
BAXTER WARD

March 6, 1980

**ADOPTED**  
BOARD OF SUPERVISORS  
COUNTY OF LOS ANGELES

Honorable Board of Supervisors  
County of Los Angeles  
383 Hall of Administration

87

JUN 10 1980

Dear Supervisors:

APPROVAL OF ENVIRONMENTAL IMPACT  
REPORT AND ARCHITECTURAL PROGRAM  
VIRGINIA ROBINSON GARDENS  
SPECS. NO. 3987; C.P. NO. 68579  
(GF) SD-3

JAMES S. HIZE  
EXECUTIVE OFFICER

On March 12, 1974, your Board approved an agreement to assume possession of the 6.2 acre Virginia Robinson Estate upon Mrs. Robinson's death for use as a botanic garden. Existing improvements on the property include a main residence, servant quarters, guest cottage, swimming pool, tennis court and extensively landscaped gardens. The agreement includes an endowment fund of \$1,000,000 which will be paid to California Arboretum Foundation for maintenance and upkeep of the property. Legal title of property was conveyed to the County on March 12, 1974. With Mrs. Robinson's death on August 5, 1977, the Department of Arboreta and Botanic Gardens assumed maintenance of the estate.

Submitted for approval is the final Environmental Impact Report and Architectural Program for the Development of Virginia Robinson Gardens as prepared by the County Engineer-Facilities Department and approved by the Department of Arboreta and Botanic Gardens. The project provides for the Gardens to be developed in two phases. Phase I Development will allow the grounds to be opened for public tours by reservation only and will include paving the existing gravel drive and parking area for 15 cars. The project will also include installing an on-site fire hydrant, improving the existing walks and patios by eliminating safety hazards and remodeling the guest cottage to provide public toilet facilities. Phase II Development will permit the main residence and the cottage to be opened for public tours, classes and seminars as more fully described in the attached program.

The total project cost including Environmental Impact Report, plans and construction for Phases I and II is \$430,000.

Honorable Board of Supervisors

March 6, 1980  
Page 2 3987

The Environmental Impact Report indicating that this project has little significant effect upon the environment is attached for your Board's approval. This report has been made available for review and comment by the interested parties and various public agencies as provided for in the Environmental Document Reporting Procedures and Guidelines adopted by your Board on March 25, 1975. Comments generated as a result of this review were responded to by the Department of County Engineer-Facilities and are included in the final Environmental Impact Report.

IT IS RECOMMENDED THAT YOUR BOARD:

1. Approve the final Environmental Impact Report; certify that the final Environmental Impact Report complies with the California Environmental Quality Act and with the State and County guidelines and that the Board has reviewed and considered the Environmental Impact Report, and that the Board determine that the project will not have a significant effect on the environment.
2. Approve the attached Architectural Program for the Development of Virginia Robinson Gardens.

Very truly yours,

  
STEPHEN J. KOONCE  
County EngineerSJK:VHH  
JG:mpk 23

Attachments

cc: Arboreta and Botanic Gardens

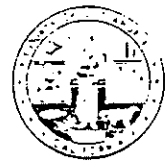


STEPHEN J. KOONCE  
County Engineer

COUNTY OF LOS ANGELES  
DEPARTMENT OF COUNTY ENGINEER-FACILITIES  
550 SOUTH VERMONT, LOS ANGELES, CA 90020

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RAYMOND W. LOOMIS  
Assistant County Engineer



BOARD OF SUPERVISORS

PETER F. SCHABARUM  
KENNETH HAHN  
EDMUND C. EDELMAN  
YVONNE BRATHWAITE BURKE  
BAXTER WARD

May 23, 1980

To: Whom It May Concern

From: Stephen J. Koonce  
County Engineer *[Signature]*

Subject: SUPPLEMENT TO FINAL  
ENVIRONMENTAL IMPACT REPORT  
THE VIRGINIA ROBINSON GARDENS

As a result of further communications with the Beverly Hills Community, the aforementioned project is being revised by this supplement to the Final Environmental Impact Report as identified in the attached letter dated May 23, 1980 to Mr. Sidney J. Machtinger. It is anticipated that the Final Environmental Impact Report, with this supplement, will go before the Board of Supervisors on June 3, 1980.

If you have any questions regarding this matter, please contact Mr. Claude Woodall of this office at 738-2227.

SJK:dm 22

Attachments





STEPHEN J. KOONCE  
County Engineer

COUNTY OF LOS ANGELES  
DEPARTMENT OF COUNTY ENGINEER-FACILITIES  
550 SOUTH VERMONT, LOS ANGELES, CA 90020

(213) 736-2011

RAYMOND W. LOOMIS  
Assistant County Engineer



BOARD OF SUPERVISORS

PETER F. SCHABARUM  
KENNETH HAHN  
EDMUND D. EDELMAN  
YVONNE BRATHWAITE BURKE  
BAXTER WARD

May 23, 1980

Mr. Sidney J. Machtinger  
Greenberg & Glusker, Lawyers  
1900 Avenue of the Stars  
Suite 2000  
Los Angeles, California 90067

Dear Mr. Machtinger:

FINAL ENVIRONMENTAL IMPACT REPORT  
THE VIRGINIA ROBINSON GARDENS

Your letter, dated April 9, 1980, to Mr. Roy T. Ito, Assistant Director, Arboreta and Botanic Gardens, contained comments and specific proposals resulting from your March 28, 1980 meeting with Supervisor Edelman, during which proposed changes in the use of the Virginia Robinson Gardens were discussed. Your proposals and the revisions to the Final Environmental Impact Report based on those proposals are as follows:

- (1) "All imprecise language would be eliminated and the proposed use of the facility would be specific as to time of visitation, number of people allowed on the premises, number of cars allowed to visit at any one time and all other aspects of the use of the property. It is our understanding that this concept is in accord with the intention of the Arboretum Society and does not conflict with what was intended in the Environmental Impact Report. This would require a change in the language on pages 8, 9, 10, 39 and 40. As an example, on page 8 in paragraph 2a, the word "normally" would be eliminated in reference to public visitation hours between 10 a.m. and 4 p.m. The phrase "with limited exceptions" would be eliminated in that same paragraph. Other imprecise words and phrases would also be eliminated."

Page 1, Circulation has been revised to read as follows:

"The proposed project will cause an increase in traffic flow on Crescent Drive and Elden Way of an estimated 84 vehicle trips per day Tuesday through Friday between 10 A.M. and 3 P.M.; this represents an increase of 23% in traffic flow on Crescent Drive and 142% increase on Elden Way."

Page 8, Item 2.a, first paragraph, has been revised to read as follows:

"In addition to testing of plants, the Arboretum education program will include special tours of the grounds for biology, botany and horticulture groups with related classes and seminars. Public visitation will be by group reservation only, with hours of operation between 10 A.M. and 3 P.M. Tuesday through Friday and closed weekends and holidays. The twice daily tours, 10:00-12:00 and 1:00-3:00, will each be limited to fifty persons and twenty automobiles. With the exception of a maximum of two events annually, as discussed under c. below, all visitors will be required to park on the site."

Page 10, first paragraph, which discussed twelve annual evening events, has been deleted; the twelve annual evening events are no longer proposed.

Page 25, Item 3, last paragraph, first sentence, has been revised to read as follows:

"The Robinson Gardens will provide 20 visitor parking spaces and will be open from 10 A.M. to 3 P.M. Tuesday through Friday."

Page 26, first paragraph, which referred to increased monthly vehicle trips due to the twelve annual evening events, has been deleted.

Page 30, second paragraph, last sentence, has been revised to read as follows:

"However, given the limited hours of operation planned for the Gardens (10 A.M. to 3 P.M.) and the design of homes in the area (large lots with large setbacks), any increase in noise should not be perceived as substantial by residents."

Page 31, Item c. has been revised to read as follows:

"Traffic noise attributed to the tours will occur Tuesday through Friday during four approximately one-half hour periods - 9:30-10:00 A.M. and 12:30-1:00 P.M. when visitors are arriving for the tours and 12:00-12:30 P.M. and 3:00-3:30 P.M. when visitors are departing after the tours."

Page 32, Item d. at the top of the page has been deleted; this referred to the one-per-month special evening events which are no longer included in the proposals for Virginia Robinson Gardens.

Page 32, Item e. which refers to the tennis court parking, has revised to read as follows:

"The existing north wall of the tennis court will help attenuate automobile sounds if the tennis court is converted to parking."

Page 37, Item B.1, first paragraph, second sentence has been revised to read as follows:

"Traffic on these streets will increase by approximately 84 vehicle trips per day between the hours of 10 A.M. and 3 P.M. Tuesday through Friday."

Page 37, Item B.1, third paragraph, which referred to increase in traffic for the special evening events, has been deleted; the twelve special evening events are no longer proposed.

Page 39, Item C.1 has been revised to read as follows:

"The proposed Virginia Robinson Gardens will be open for public visitation Tuesday through Friday between the hours of 10 A.M. and 3 P.M. This restriction should help ease the impact of the expected increase in traffic on Elden Way and Crescent Drive by limiting it to weekday, daylight hours."

Page 39, Item C.2, third sentence has been revised to read as follows:

"Traffic and the corresponding traffic-generated noise, will occur Tuesday through Friday during four approximately one-half hour periods - 9:30 to 10:00 A.M. and 12:30 to 1:00 P.M. when visitors are arriving for the tours and 12:00 to 12:30 P.M. and 3:00 to 3:30 P.M. when visitors are departing."

Page 39, Item C.3, which referred to the special evening events, has been deleted; this is no longer proposed.

- (2) "The Environmental Impact Report should specifically state that all parking by all persons visiting the facility would be on the Robinson premises and that there would be no off-street parking whatsoever. You indicated that this was also your understanding."

It is assumed that the phrase "off-street" was intended to be "on-street". The EIR does state that all parking will be on the grounds of the Gardens except for a maximum of two annual events. These facts are stated on page 8, Item 2.a, first paragraph, last sentence, as follows:

"With the exception of a maximum of two events annually, as discussed under c. below, all visitors will be required to park on the site."

- (3) "Public visitation would be limited to 20 cars containing a maximum of 50 persons. Luncheon meetings would be limited to 20 cars containing no more than 80 persons. Again, you indicated that this is your understanding of the EIR."

This continues to be the proposal for public visitation and luncheon meetings as indicated in the Final EIR on pages 8 and 9. The proposed days and hours of operation have been revised as indicated in Item 1 above.

- (4) "Visitation would be between the hours of 11 a.m. and 3 p.m., rather than 10 a.m. to 4 p.m., as proposed. The first EIR originally proposed that visitation be between 11 a.m. and 4 p.m. The present EIR enlarged on those visitation hours. It is our opinion that the hours of 10 a.m. to 4 p.m. present a traffic danger and hazard and an early morning noise nuisance to the Community. The EIR states that traffic would be heaviest between 9:30 a.m. and 10 a.m. and between 4 p.m. and 4:30 p.m. Since our children are going to and from school at those hours, it is essential that the time of visitation be reduced. Moreover, there is no reason why two visitations per day cannot be accommodated between the hours of 11 a.m. and 3 p.m. without any reduction of benefits to visitors."

Visitation times have been revised to 10 a.m. to 3 p.m., Tuesday through Friday. As indicated in Item 1 above, these times and days have been revised on pages 1, 8, 25, 30, 37 and 39 of the EIR.

- (5) "Visitation days should be between Tuesday and Friday rather than Tuesday and Saturday, as proposed. Again, with school children home on Saturdays, the added traffic on Saturdays, combined with the additional tourist traffic which regularly passes through Beverly Hills on Saturdays, presents a traffic hazard. This was not examined at all in the EIR. Taking into account the limited access to the Robinson Estate, we believe it is essential that there be no public visitation on Saturdays."

Please refer to Item 4 above.

- (6) "There should be no visitation whatsoever by bus. The EIR proposes that group tours by bus may "occasionally" be in lieu of one of the daily tours. It is impossible for buses to park on the facility which necessitates parking on the street. Buses cannot make the turn on the cul-de-sac if any automobiles are parked in the cul-de-sac area. Buses would,

therefore, be forced to park a block from the facility with the public walking to and from the facility. The EIR does not discuss or review the noise occasioned by visitors walking to and from the bus. The location of the facility does not lend itself to having large groups of people, who may be boisterous, loud, or at the very least, talking among themselves, walking to and from the Robinson Estate. Groups of people could be bused to the facility with mini-buses with the mini-buses parking right on the grounds. The public can, therefore, be accommodated by mini-bus, eliminating the problems presented by bus transportation."

Page 9, the first paragraph, which discusses group tours by bus, should be deleted and replaced with the following:

"Group tours by bus will not be permitted except by mini-buses of such a size that can be accommodated in the on-site parking spaces."

Page 44, Item 3, fifth paragraph discusses the alternate of visitors arriving by bus, walking on the street and disturbing the neighbors' privacy.

- (7) "There is also no need for what is described as "not more than 12 unobtrusive evening events". Evening events create noise and disturb the neighbors to a greater degree than daytime events. Evening events are not necessary to accomplish the primary purpose of the Estate, which, according to the EIR, is "the growing, testing and demonstration of plants". Moreover, the business of an evening event can be accomplished just as well during a luncheon event which can be held at any time and may give the benefit of viewing the facility during daytime hours."

As indicated in Item 1 above, the previous proposal for twelve special evening events has been eliminated from consideration and deleted from pages 10, 26, 32, 37 and 39 of the EIR.

- (8) "There would be permitted two large evening events similar to those which Mrs. Robinson conducted during her life-time."

The discussion of two large evening events annually, as included in the EIR, remains a part of the proposals for Virginia Robinson Gardens.

Very truly yours,

STEPHEN J. KOONCE  
County Engineer



Mr. Roy T. Ito  
April 9, 1980  
Page 2

We believe that concessions must also be made by the Arboretum Society and by the Trustees of the Robinson Estate. If all parties cooperate, the Robinson Estate may be of benefit to everyone. With this spirit in mind, we propose the following:

(1) All imprecise language would be eliminated and the proposed use of the facility would be specific as to time of visitation, number of people allowed on the premises, number of cars allowed to visit at any one time and all other aspects of the use of the property. It is our understanding that this concept is in accord with the intention of the Arboretum Society and does not conflict with what was intended in the Environmental Impact Report. This would require a change in the language on pages 8, 9, 10, 39 and 40. As an example, on page 8 in paragraph 2a, the word "normally" would be eliminated in reference to public visitation hours between 10 a.m. and 4 p.m. The phrase "with limited exceptions" would be eliminated in that same paragraph. Other imprecise words and phrases would also be eliminated.

(2) The Environmental Impact Report should specifically state that all parking by all persons visiting the facility would be on the Robinson premises and that there would be no off-street parking whatsoever. You indicated that this was also your understanding.

(3) Public visitation would be limited to 20 cars containing a maximum of 50 persons. Luncheon meetings would be limited to 20 cars containing no more than 80 persons. Again, you indicated that this is your understanding of the EIR.

(4) Visitation would be between the hours of 11 a.m. and 3 p.m., rather than 10 a.m. to 4 p.m., as proposed. The first EIR originally proposed that visitation be between 11 a.m. and 4 p.m. The present EIR enlarged on those visitation hours. It is our opinion that the hours of 10 a.m. to 4 p.m. present a traffic danger and hazard and an early morning noise nuisance to the Community. The EIR states that traffic would be heaviest between 9:30 a.m. and 10 a.m. and between 4 p.m. and 4:30 p.m. Since our children are going to and from school at those hours, it is essential that the time of visitation be reduced. Moreover, there is no reason why two visitations per day cannot be accommodated between the hours of 11 a.m. and 3 p.m. without any reduction of benefits to visitors.

Mr. Roy T. McC

April 9, 1980

Page 3

(5) Visitation days should be between Tuesday and Friday rather than Tuesday and Saturday, as proposed. Again, with school children home on Saturdays, the added traffic on Saturdays, combined with the additional tourist traffic which regularly passes through Beverly Hills on Saturdays, presents a traffic hazard. This was not examined at all in the EIR. Taking into account the limited access to the Robinson Estate, we believe it is essential that there be no public visitation on Saturdays.

(6) There should be no visitation whatsoever by bus. The EIR proposes that group tours by bus may "occasionally" be in lieu of one of the daily tours. It is impossible for buses to park on the facility which necessitates parking on the street. Buses cannot make the turn on the cul-de-sac if any automobiles are parked in the cul-de-sac area. Buses would, therefore, be forced to park a block from the facility with the public walking to and from the facility. The EIR does not discuss or review the noise occasioned by visitors walking to and from the bus. The location of the facility does not lend itself to having large groups of people, who may be boisterous, loud, or at the very least, talking among themselves, walking to and from the Robinson Estate. Groups of people could be bused to the facility with mini-buses with the mini-buses parking right on the grounds. The public can, therefore, be accommodated by mini-bus, eliminating the problems presented by bus transportation.

(7) There is also no need for what is described as "not more than 12 unobtrusive evening events". Evening events create noise and disturb the neighbors to a greater degree than daytime events. Evening events are not necessary to accomplish the primary purpose of the Estate, which, according to the EIR, is "the growing, testing and demonstration of plants". Moreover, the business of an evening event can be accomplished just as well during a luncheon event which can be held at any time and may give the benefit of viewing the facility during daytime hours.

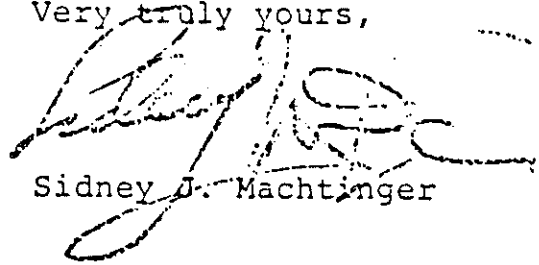
(8) There would be permitted two large evening events similar to those which Mrs. Robinson conducted during her lifetime.



Mr. Roy T. Itt  
April 9, 1980  
Page 4

I suggest that we meet to review the EIR for the purpose of changing the language of the EIR so that it sets forth the suggestions proposed in this letter.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'Sidney J. Machtinger', written over the typed name.

Sidney J. Machtinger

SJM/j

cc: Supervisor Ed Edelman  
Joseph Sinay  
David Rowen  
Robert Dickerman  
Robert Trugman  
B. Mocktarian



STEPHEN J. KOONCE  
COUNTY ENGINEER

RAYMOND W. LOOMIS  
Assistant County Engineer

COUNTY OF LOS ANGELES  
DEPARTMENT OF COUNTY ENGINEER-FACILITIES  
550 SOUTH VERMONT, LOS ANGELES, CA 90020

(213) 738-2011



BOARD OF SUPERVISORS

PETER F. SCHABARUM  
KENNETH HAHN  
EDMUND O. EDELMAN  
YVONNE BRATHWAITE BURKE  
BAXTER WARD

March 6, 1980

Honorable Board of Supervisors  
County of Los Angeles  
383 Hall of Administration

Dear Supervisors:

APPROVAL OF ENVIRONMENTAL IMPACT  
REPORT AND ARCHITECTURAL PROGRAM  
VIRGINIA ROBINSON GARDENS  
SPECS. NO. 3987; C.P. NO. 68579  
(GF) SD-3

On March 12, 1974, your Board approved an agreement to assume possession of the 6.2 acre Virginia Robinson Estate upon Mrs. Robinson's death for use as a botanic garden. Existing improvements on the property include a main residence, servant quarters, guest cottage, swimming pool, tennis court and extensively landscaped gardens. The agreement includes an endowment fund of \$1,000,000 which will be paid to California Arboretum Foundation for maintenance and upkeep of the property. Legal title of property was conveyed to the County on March 12, 1974. With Mrs. Robinson's death on August 5, 1977, the Department of Arboreta and Botanic Gardens assumed maintenance of the estate.

Submitted for approval is the final Environmental Impact Report and Architectural Program for the Development of Virginia Robinson Gardens as prepared by the County Engineer-Facilities Department and approved by the Department of Arboreta and Botanic Gardens. The project provides for the Gardens to be developed in two phases. Phase I Development will allow the grounds to be opened for public tours by reservation only and will include paving the existing gravel drive and parking area for 15 cars. The project will also include installing an on-site fire hydrant, improving the existing walks and patios by eliminating safety hazards and remodeling the guest cottage to provide public toilet facilities. Phase II Development will permit the main residence and the cottage to be opened for public tours, classes and seminars as more fully described in the attached program.

The total project cost including Environmental Impact Report, plans and construction for Phases I and II is \$430,000.

JUN 10 1980

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Honorable Board of Supervisors

March 6, 1980  
Page 2 3987

The Environmental Impact Report indicating that this project has little significant effect upon the environment is attached for your Board's approval. This report has been made available for review and comment by the interested parties and various public agencies as provided for in the Environmental Document Reporting Procedures and Guidelines adopted by your Board on March 25, 1975. Comments generated as a result of this review were responded to by the Department of County Engineer-Facilities and are included in the final Environmental Impact Report.

IT IS RECOMMENDED THAT YOUR BOARD:

1. Approve the final Environmental Impact Report; certify that the final Environmental Impact Report complies with the California Environmental Quality Act and with the State and County guidelines and that the Board has reviewed and considered the Environmental Impact Report, and that the Board determine that the project will not have a significant effect on the environment.
2. Approve the attached Architectural Program for the Development of Virginia Robinson Gardens.

Very truly yours,

  
STEPHEN J. KOONCE  
County Engineer

SJK:VIII  
JG:mpk 23

Attachments

cc: Arboreta and Botanic Gardens

# **The Virginia Robinson Gardens**

**Arboreta and Botanic Gardens**

## **environmental impact report**

**Stephen J. Keonig, County Engineer**

**County of Los Angeles, Dept. of County Engineer-Facilities**

**350 South West Street, Los Angeles, CA 90005**



STEPHEN J. KOONCE  
COUNTY ENGINEER

RAYMOND W. LOGANS  
COUNTY ENGINEER

COUNTY OF LOS ANGELES  
DEPARTMENT OF COUNTY ENGINEER-FACILITIES  
550 SOUTH VERMONT, LOS ANGELES, CA 90020

(213) 738 2011



BOARD OF SUPERVISORS

PETER F. SCHABARUM  
KENNETH HAHN  
EDMUND D. EDELMAN  
YVONNE BRATHWAITE BURKE  
BAXTER WARD

February 25, 1980

To: Whom It May Concern

From: Stephen J. Koonce  
County Engineer *by Kim Barnack*

Subject: FINAL ENVIRONMENTAL IMPACT REPORT  
THE VIRGINIA ROBINSON GARDENS

Attached for your information is the Final Environmental Impact Report for the aforementioned project. The Draft EIR for this project was circulated for review and comment on June 9, 1978. This report reflects the changes made in response to comments generated by the circulation of the Draft EIR. The comments and responses are included in the Addendum. It is anticipated that the Final EIR will go before the Board of Supervisors for approval on March 18, 1980.

If you have any questions regarding this matter, please contact Mr. Claude Woodall of this office at (213) 738-2227.

SJK:mm 22

Attachment

ENVIRONMENTAL IMPACT REPORT  
THE VIRGINIA ROBINSON GARDENS

STEPHEN J. KOONCE, COUNTY ENGINEER  
DEPARTMENT OF COUNTY ENGINEER-FACILITIES  
550 SOUTH VERMONT AVENUE  
LOS ANGELES CALIFORNIA 90020

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VIRGINIA ROBINSON GARDENS

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Plant Introduction Program, Dept. of Arboreta  
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Procedures on Acquisitioning, Accessioning and  
Record Keeping, Plant-Introduction Program  
Plant Collection Program  
Comments Received on the Draft Environmental  
Impact Report



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NOTE:

Items which have been added to the Draft Environmental Impact Report are indicated with a vertical line in the right hand margin.

Items deleted from the Draft Environmental Impact Report have been lined out ~~thus~~.

### SUMMARY

This report addresses the potential environmental effects of the development of an arboretum and botanic garden at the Virginia Robinson Estate, located at 1008 Elden Way in the City of Beverly Hills.

The Virginia Robinson Gardens will be developed primarily as a facility for the growing, testing, and demonstration of plants that cannot be grown well at other Arboretum facilities.

Because of the unique climatic conditions, the site offers optimum growing conditions for a wide range of tropical and sub-tropical type plants that will complement the Arboretum's collection of plants. Horticulturally desirable and suitable plants will be made available to the nursery industry and to the general public as part of the Arboretum's Plant Introduction Program.

The Arboretum's Education Program will utilize the proposed gardens for special tours by biology, botany and horticultural classes. The furnished residence, constructed in 1911 and the first house in Beverly Hills, will also be a part of the Estate tour. Public visitation of the Robinson Gardens will be by reservation, during specific and limited hours.

The significant environmental effects associated with this project are:

#### Land Use

The proposed project will change land use at the Robinson Estate from residential to public open space. An indirect effect of this may be a loss in privacy realized by neighbors in the area; this will be mitigated by measures discussed in Section III, C.

#### Circulation

The proposed project will cause an increase in traffic flow on Crescent Drive and Elden Way ~~on local streets~~ of an estimated 84 ~~96~~ vehicle trips per day ~~This increase will occur~~ principally Tuesday through Saturday ~~on weekdays~~ between 10 A.M. and 4 P.M.; this represents an increase of 23% in traffic flow on Crescent Drive and 142% increase on Elden Way. The future conversion of the tennis court to parking for twelve annual special evening events will result in a total increase of 172 vehicle trips per day for one day per month; this will represent an increase of 48% in traffic flow on Crescent Drive and a 291% increase on Elden Way, one day per month.

• In addition to the analysis of the proposed project, this report addresses the environmental effects of five separate alternatives. These alternatives are: (1) "No Project" a) The City of Beverly Hills operating the Robinson Garden, b) The possibility of the Robinson Estate being developed for residential purposes and, c) the Robinson Estate remaining as a single family residence, (2) Reduced Scope, and (3) The use of an alternative site or design.

## INTRODUCTION

### A. Purpose of the Report

This ~~Draft~~ Environmental Impact Report (EIR) has been prepared for the proposed Virginia Robinson Gardens project in accordance with the California Environmental Quality Act of 1970 (CEQA), as amended, and the Los Angeles County Environmental Document Reporting Procedures and Guidelines of 1977. The report is intended to provide an independent analysis of environmental impacts and proposed mitigating measures which may result from the development and operation of the Virginia Robinson Gardens.

### B. Legal Requirements

The California Environmental Quality Act of 1970 (CEQA) requires that an EIR be prepared for all projects where the initial study identifies possible or obvious significant environmental impacts. CEQA states that an EIR should be prepared when there is serious public controversy concerning the environmental effect of a project.

The Los Angeles County Department of County Engineer-Facilities has been designated the "Lead Agency" in compliance with CEQA and the Los Angeles County Environmental Document Reporting Procedures and Guidelines, and has been directed to develop this EIR.

### C. Environmental Impact Report Procedure

This EIR has been prepared pursuant to the basic intent of CEQA and the Los Angeles County Guidelines. The EIR represents a full and objective disclosure of all known facts relevant to the identified environmental effects of the proposed project. The document is intended to assist decision makers in the selection and implementation of an action that best meets the needs of all interested parties.

In the preparation of this EIR a formal Initial Stu. was not completed and is not attached because the Los Angeles County Department of County Engineer-Facilities, the Lead Agency in this project, has determined pursuant to Section ~~401 of the County Environmental Document Reporting Procedures and Guidelines~~, that the project will clearly ~~have a significant effect, thus requiring an EIR.~~ 15080 of the State of California Guidelines for Implementation of the California Environmental Quality Act that the project "may cause a significant effect on the environment," thus requiring an EIR.

The initial study format was utilized to gather and assimilate data. The EIR was developed following the format below:

1. Project Description
2. Environmental Setting
3. Significant Environmental Impacts
4. Significant Environmental Impacts That Cannot Be Avoided.
5. Mitigation Measures.
6. Alternatives to the Proposed Project.
7. Growth Inducing Impacts.

ENVIRONMENTAL IMPACT REPORT  
THE VIRGINIA ROBINSON GARDENS

SECTION I - PROJECT DESCRIPTION

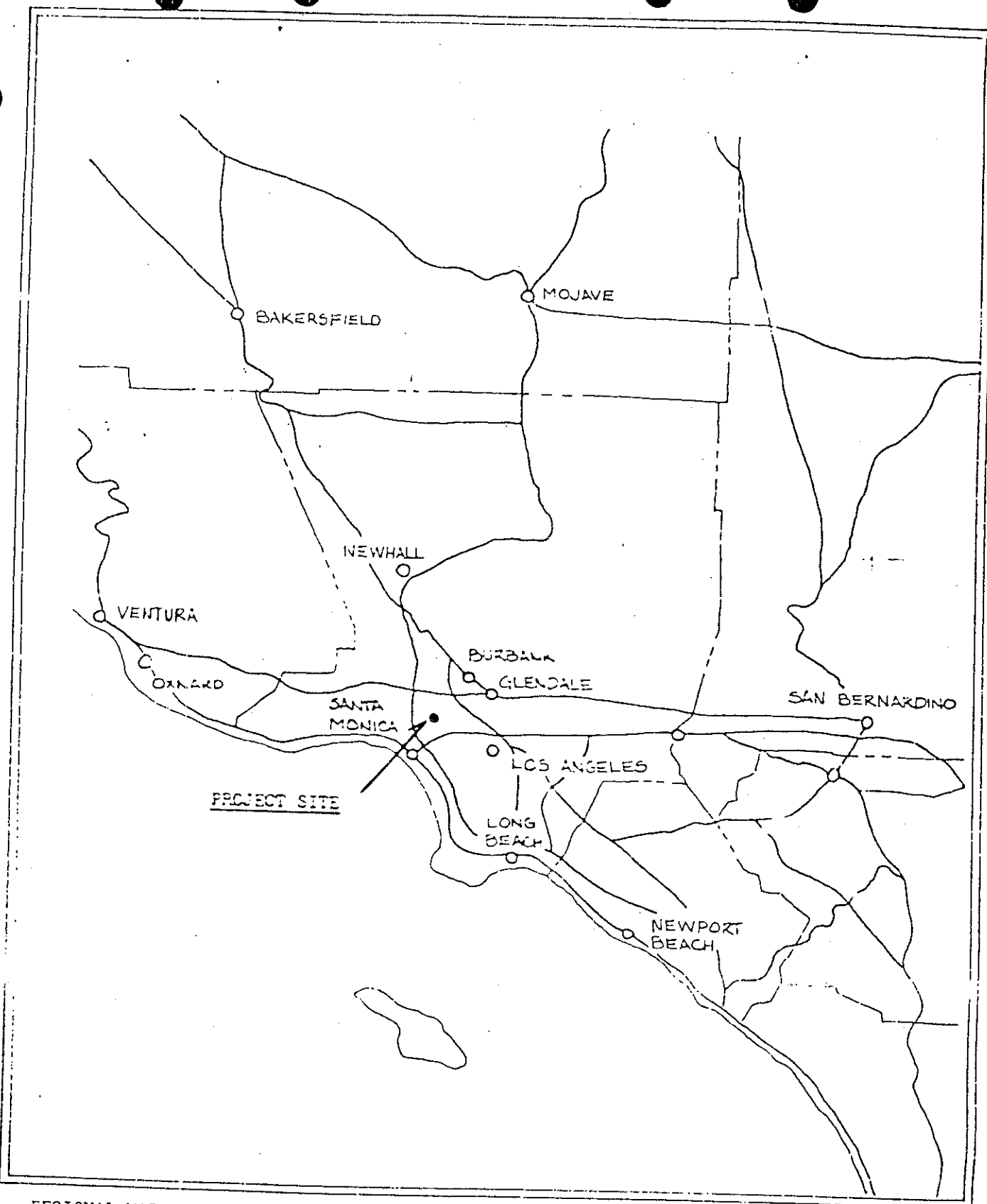
A. Location

The 6.2 acre Virginia Robinson Estate is located at 1008 Elden Way, within the City of Beverly Hills, approximately 8.5 miles west of the Los Angeles Civic Center. The estate is located within the boundaries of the Third Supervisorial District of Los Angeles County. (See figures one and two).

B. Objectives

On March 12, 1974 the Los Angeles County Board of Supervisors approved an agreement to assume possession of the Virginia Robinson Estate upon her death. Under this agreement the County agreed to preserve the property and operate it as an arboretum or botanical garden. If the County is unable to or unwilling to operate the property as an arboretum or botanic garden, title to the property would then vest in the City of Beverly Hills pursuant to the terms of the agreement and the deed. In the event that the City was unable or unwilling to operate the property as an arboretum or botanic garden, the property would then revert to Mrs. Robinson's estate and pass to the residuary beneficiaries under her will. The agreement with Mrs. Robinson included an endowment fund of one million dollars to be paid to the California Arboretum Foundation for maintenance and upkeep of the property. With Mrs. Robinson's death on August 5, 1977, the Los Angeles County Department of Arboreta and Botanic Gardens has taken over maintenance of the property.

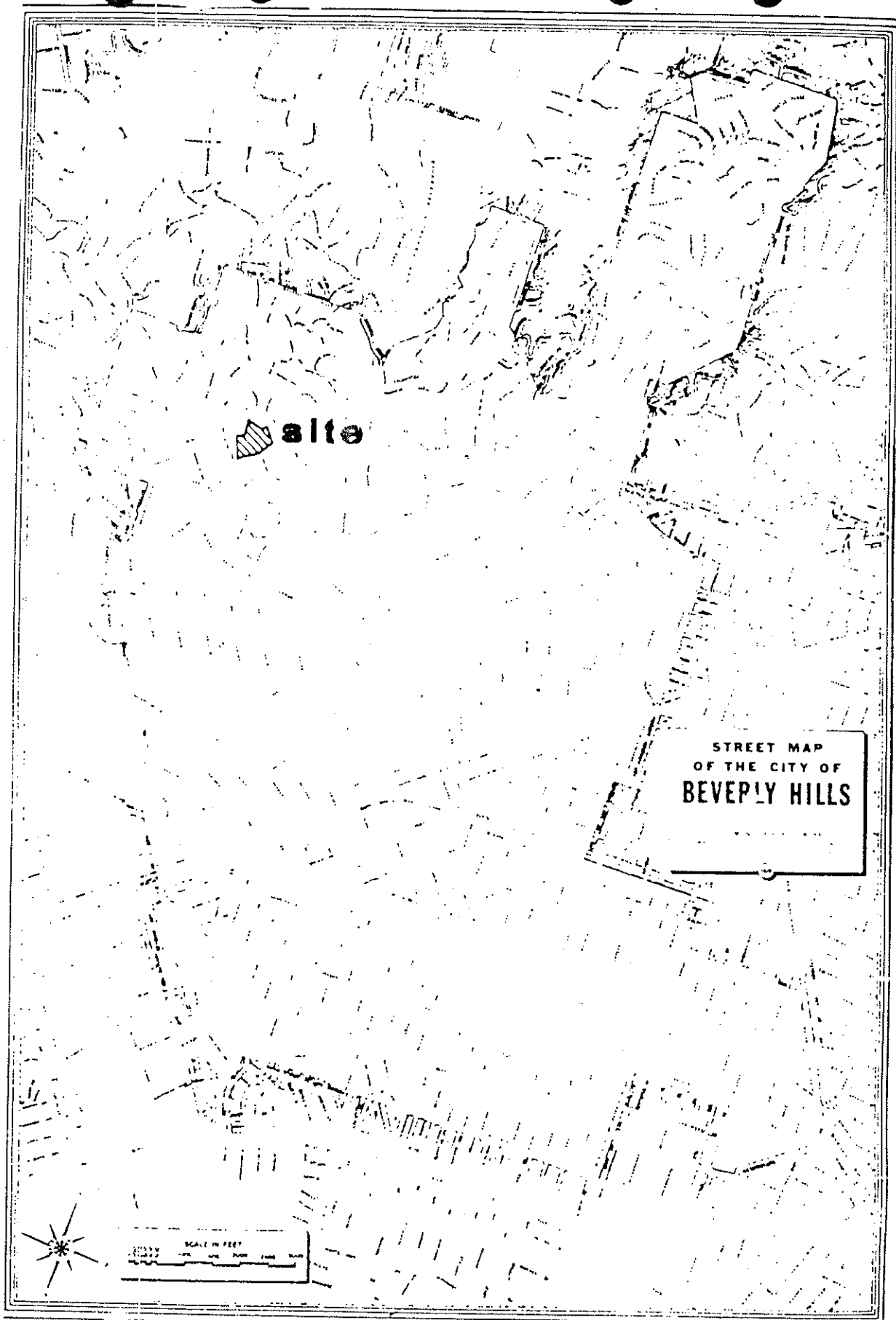
The County of Los Angeles has previously submitted information regarding the proposed acquisition of the Virginia Robinson Gardens to the Beverly Hills Planning Commission as required by Government Code Section 65402. At its December 17, 1973 meeting, the Planning Commission made a finding that the acquisition of the property by the County would not violate the City's General Plan, since Mrs. Robinson would continue to use the property as a single family residence during the remainder of her lifetime. The City of Beverly Hills has requested that when the County's plans for developing the property as an arboretum or botanic garden have been completed, they be submitted to the Planning Commission for a report on whether the proposed development conforms to the General Plan then in effect.



REGIONAL MAP

Figure 1





PROJECT LOCATION

## SECTION I

### C. Description of Project

#### 1. Plant Testing Facility

The Virginia Robinson Gardens will be developed primarily as a facility for testing, planting, and demonstrating the natural growth of plants that cannot be grown at other Arboretum facilities which are: Los Angeles State and County Arboretum, 301 North Baldwin Avenue, Arcadia, California 91006; Descanso Gardens, 1418 Descanso Drive, La Canada, California 91011; and South Coast Botanic Garden, 26300 Crenshaw Boulevard, Palos Verdes Peninsula, California 90274.

Because of the mild climate at the site, the Arboretum will carry on the testing of tropical plants and departmental plant collection programs. The types of plants to be grown at the Robinson Gardens are subtropical, especially palms, flowering trees, gingers, ferns, bromeliads and plumeria that may not be grown at other facilities.

Plants already in the Robinson Gardens indicate the subtropical climate of this area is ideal for growing subtropical plants. Ficus trees may be observed in the garden with aerial roots, a phenomena not seen in any other public garden in this area. The winter of 1979 was a graphic example of the climatic difference of the Robinson Gardens. All Arboreta and Botanic Gardens' facilities suffered heavy frost damage; none was observed in the Robinson Gardens.

One of the primary purposes of the Department of Arboreta and Botanic Gardens is to introduce plants from other parts of the world and test them for their potential to be introduced into the Southern California horticulture. Already, the Department has introduced more than 80 different plant species to enrich our environment through the addition of new plant species to Southern California horticulture. Plants are acquired from other botanic gardens around the world through an active seed exchange program. The plants are not unknown to botanists and horticulturists but are new to this area. Since the primary aim is to acquire new ornamental species, plants known to be toxic in any manner will not be considered for testing. Examples of plants to be tried might include *Delonix regia* and *Spathodea* spp.

The testing conducted by the Department of Arboreta and Botanic Gardens consist of evaluating plants which are to be considered for introduction into the Southern California environment by planting at Arboretum facilities and judging the adaptability to the soils

## SECTION I

and climate, the growth rate, flowering characteristics and desirability in the local landscape.

The "testing" of the plants includes various watering schedules, amounts of shade/sunshine and a variety of soil mixtures and nutriment. There will be no "scientific" experiments beyond those which could be conducted by any local horticulturist. As mentioned above, plants known to be toxic or undesirable in any manner are not accepted by the Arboretum for testing; also, if any undesirable characteristics are discovered by the Arboretum, subject plants would not be recommended for introduction into the local landscape.

The collection program of the Department is related directly to the plant introduction program whereby plants are collected from other areas of the world to be tested here for their ornamental value. The program has already been implemented and will be expanded to include more subtropical plants species to be grown at the Robinson Gardens. These plants will come from around the world and be transported to the Robinson facility by pickup truck once established in containers of 1-5 gallon size. They will be planted and grown in the Robinson Gardens as part of the landscape feature.

### 2. Public Use

#### a. Visitors

In addition to testing of plants, the Arboretum education program will include special tours of the grounds for biology, botany and horticulture groups with ~~and other~~ related classes and seminars. Public visitation will be by group reservation only, with hours of operation normally between 10 A.M. and 4 P.M. ~~weekdays~~ Tuesday through Saturday and closed ~~weekends~~ Sundays, Mondays and holidays, with limited exceptions. The twice daily tours, 10:00-12:00 and 2:00-4:00, will each be limited to fifty persons and twenty automobiles. With the exception of a maximum of two events annually, as discussed under c. below, all visitors will be required to park on the site.

The tours of Virginia Robinson Gardens will be conducted by a tour guide who will explore the botanical and landscaping values of the estate, the guest house and residence. The guide will be with the guests at all times; guests will not be free to explore the Estate independently. Information regarding the tours will be directed toward horticultural/botanical groups; reservations will be made by telephone and

## SECTION I

confirmed by mail as in the case of the Getty Museum and the UCLA Japanese Gardens. Parking will be carefully controlled on the grounds. There will not be any on-street visitor parking.

Group tour by bus may occasionally be in lieu of one of the above tours. Buses will leave visitors at the Garden's entrance on Elden Way and pick them up at the end of the tour. Buses will be required to park off-site and away from residential areas. On occasion when a special group is authorized to remain longer than the regular time allowed, public tours will not be scheduled to overlap with the special group.

### b. Classes and Seminars

Classes and seminars may be scheduled periodically in the guest cottage; these will be limited in the same fashion as indicated above. Luncheon meetings may also be scheduled periodically and limited in number to eighty persons; number of vehicles, twenty. These will probably be held on the lawn or patio areas as the guest cottage will have posted occupancy of forty-nine persons. The residence will also be available for public tours. Public tours and special group tours will not be scheduled in the event a luncheon meeting, class, or seminar is held on a given day.

### c. Special Uses

Special uses will be similar to those conducted by Mrs. Robinson during her tenancy, and, therefore, no more obtrusive to the community. For many years Mrs. Robinson invited the Hollywood Bowl Patronesses to her home to hold their annual kickoff banquet prior to the Hollywood Bowl season. Approximately 500 guests appear at this event annually. Another of Mrs. Robinson's annual larger gatherings was her August Moon Ball celebrating her birthday. Future large gatherings which the Department of Arboreta and Botanic Gardens may sponsor would be fund-raising events for Virginia Robinson Gardens and possibly the continuation of the traditional banquet for the Hollywood Bowl Patronesses. No more than two events of this magnitude will be held annually; as with any private event of this magnitude, parking would be by valet service.

## SECTION I

In addition, not more than twelve unobtrusive evening events will be held annually; these may include special horticultural meetings and fund-raising banquets for Virginia Robinson Gardens. Parking for these events will be limited to forty-four cars, including twenty-four cars parked on the tennis court, which may be converted to parking in the future. The tennis court parking will be for these special evening events only and not for the daily tours; there will be no on-street parking for these events. ~~The guest cottage would be used for seminars and classes with a posted occupancy capacity of 49. The residence would also be available for public tours.~~

Commercial filming, subject to any legal restrictions, may occasionally be permitted on the Estate. This use would be subject to the same restrictions as the tour groups, including no on-street parking and prohibition from certain areas (Figure 3) to protect the neighbors' privacy. Public visitation would not be allowed on days that filming is permitted.

### 3. Site Development

Site development is included in the proposed project to bring the Virginia Robinson Estate up to current health and safety standards relating to public facilities.

Major construction activities on the site will include:

- a. Expand and pave the parking area west of the guest cottage to accommodate 15 automobiles,
- b. Pave existing driveway, from the rear of the residence to visitor parking area, to provide better access,
- c. Repair existing paved walks throughout the Estate and install some handrails to eliminate safety hazards,
- d. Install some walks and handicapped ramp for access to guest collage,
- e. Install fire hydrant on site.

## SECTION I

- f. Remodel existing guest cottage restrooms for the public, with handicapped facilities.
- g. Possible future conversion of tennis court to parking area for 24 cars.

~~The existing tennis court will be converted to guest parking for approximately 24 cars. A Tour Guide Assembly Area with benches and a comfort station will be constructed adjacent to and west of the guest parking area (see figure 3). Approximately 150 lineal feet of existing gravel driveway will be widened by four feet and paved to provide better access to the site. Existing paved walkways throughout the Estate will be improved as necessary to eliminate safety hazards.~~

Additionally, the guest cottage and main residence will require general maintenance, painting and minor alterations in terms of access to bring them up to existing standards for public occupancy. ~~Existing underground utilities will be extended to provide services for the new comfort station and fire protection.~~

To protect the privacy of the neighbors, the following plants have been located as required along the property lines of the Estate:

Cissus antartica - Evergreen grape.

Cupressocyparis leylandii - Evergreen tree.

Prunus caroliniana - Evergreen shrub.

Myoperum lacturm - Evergreen shrub.

Also, public tours will be prohibited from portions of the Estate to protect the privacy of the neighbors (Figure 3). This will be controlled by the Arboretum's tour guides who will be with visitors at all times.

#### 4. Employees

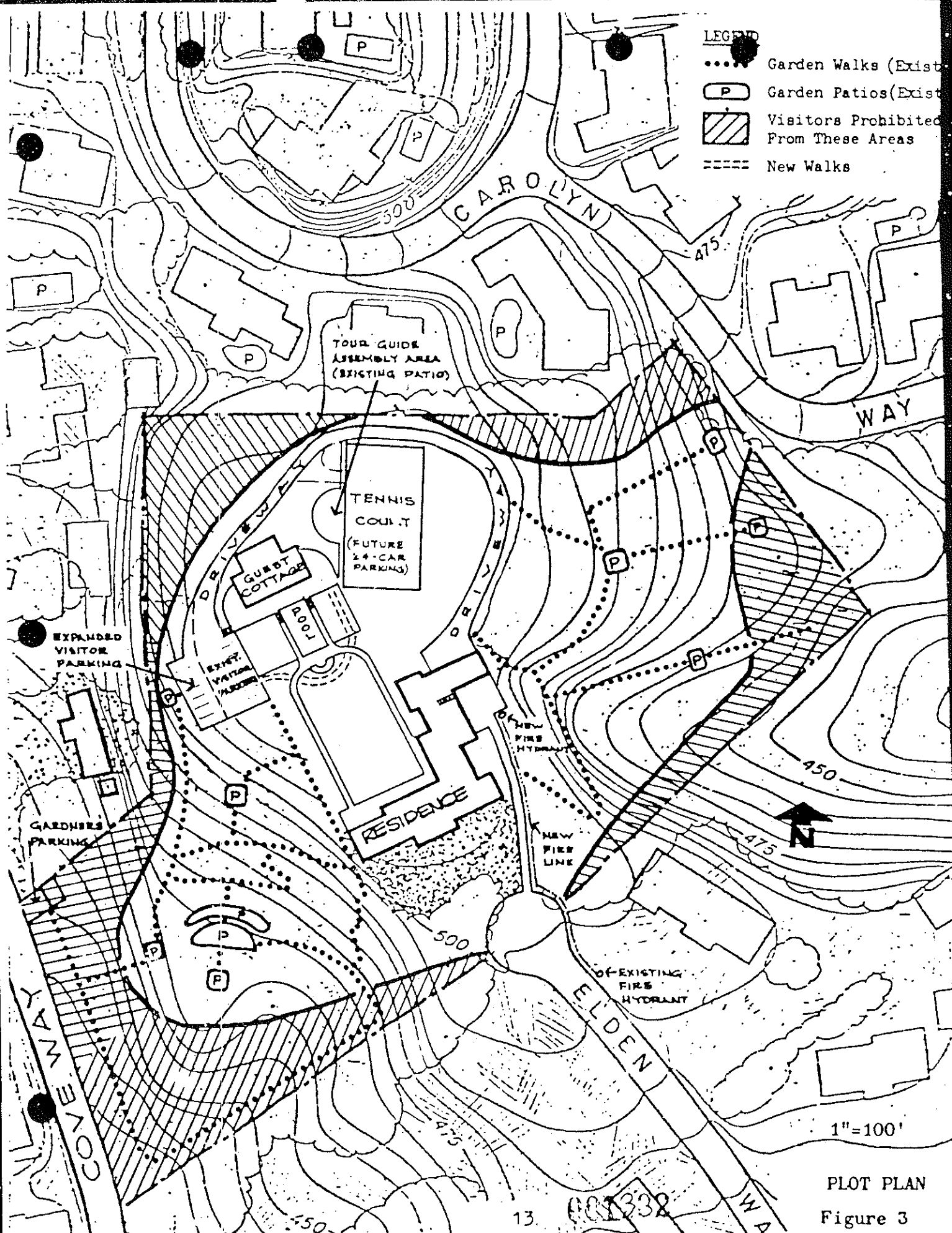
The nine employees on the Estate will consist of a caretaker, a part-time custodian, a tour guide and six gardners; the caretaker will live on the property. The caretaker, custodian (10:00 A.M. to 4:00 P.M.) and tour guide (9:30 A.M. to 4:00 P.M.) will park in the garage of the residence; the gardners (7:30 a.m. to 3:30 p.m.) will park off Cove Way in the garage and lot used by Mrs. Robinson's gardening staff. There may occasionally be part-time volunteers assisting in tours of the Estate.

5. Historical Landmark

The Los Angeles County Historical Landmarks Committee has recommended and the Board of Supervisors has endorsed their recommendation that the Virginia Robinson residence be registered as a point of Historical Interest. The application has been forwarded to the California Historical Landmark Advisory Committee for State approval. ~~Application has also been made to the National Park Service for placement of the Robinson residence on the National Register of Historical Places.~~

The Robinson Estate was placed on the National Register of Historic Places November 15, 1978 and is registered as a point of historic interest with the notation that access is restricted.

The ramifications of these registrations are discussed in Section III, part 6.





## SECTION II - GENERAL ENVIRONMENTAL SETTING

The City of Beverly Hills is located on a portion of the Coastal Plain of Los Angeles County at the base of the Santa Monica Mountains. The Coastal Plain is between the Pacific Ocean on the west and the Transverse and Peninsula Ranges to the north, south and east. Characteristics of the coastal lowlands include fertile alluvial soils which are vulnerable to numerous earth tremors and a warm dry mediterranean climate.

The proposed Virginia Robinson Gardens is located north of Sunset Boulevard in the northern portion of the City of Beverly Hills where the terrain is relatively hilly. The Robinson Estate is situated at the terminus of a quiet cul-de-sac, lined with large, opulent, single family homes. The main residence and guest house are situated atop a north/south trending ridgeline, with the terraced, landscaped gardens spreading downhill on both sides of the ridge in an east/west fashion. The Robinson Estate contains a quantity of uncommon plant species in an attractive, distinctly beautiful setting.

The area surrounding the Robinson Estate is predominately residential. The area is characterized by curvilinear streets lined with large, well maintained single family homes, occupied by upper income families.

The Los Angeles County Department of Regional Planning estimates the population in Beverly Hills (Statistical Area 3.1), as of January 1, 1976, to be approximately 31,825 persons. The City of Beverly Hills ~~has made a more recent estimate in 1977 of approximately 31,100 persons.~~ population was estimated by the State Department of Finance to be 33,251 on January 1, 1978.

### SECTION III - ENVIRONMENTAL IMPACT

#### A. The Significant Environmental Effects of the Proposed Project

Generally, the proposed Virginia Robinson Gardens will have very little impact on the Robinson property because of the projects primary objective of preserving the estate as an arboretum. However, environmental effects will occur in the area surrounding the Robinson property due mainly to the change in land uses.

##### 1. Physical Features

###### a. Landform

The Virginia Robinson Estate is located atop a small north/south trending ridge in an area of relatively hilly terrain. The topography throughout the six acre estate varies from a low of 450 feet to a high of 515 feet above sea level. The main residence is constructed on terrain with a slope of about 3-4%, while the landscaped gardens slope as much as 70% (see figure three).

According to the Seismic Safety Element of the Beverly Hills General Plan the geologic formation underlying the Robinson property is composed primarily of Santa Monica Slate (see figure 4). Santa Monica Slate is a relatively stable formation that does not move easily during seismic activity. For further information on this subject a copy of the Seismic Safety Element is available at the City of Beverly Hills Planning Department, 450 North Crescent Drive, Beverly Hills, CA.

The proposed project will have a negligible effect on existing landform in that only small amounts of grading will occur in the expansion of the existing parking area west of the guest cottage from approximately 2800 square feet to approximately 4800 square feet.

Two brick retaining walls, approximately six feet high x eighty feet in length and two feet six inches high x sixty feet in length, will be constructed in conjunction with the expanded parking area. The future conversion of the existing tennis court to parking will require minimal disturbance for automobile access. ~~widening of 150 lineal feet of existing gravel driveway.~~ Excavation for the location of a fire hydrant on the site may involve some short-term disturbance to landform during construction. ~~the extension of underground utilities to serve the proposed Comfort Station will occur, but, this will be very routine and insignificant.~~

### SECTION III

#### b. Hydrology

According to the Seismic Safety Element of the Beverly Hills General Plan, perched groundwater is frequently found at shallow depths in the alluvium sector of the city (see figure four). The project site is underlaid by Santa Monica Slate which is less likely to have shallow groundwater.

The proposed project will not adversely affect or be adversely affected by perched groundwater as very little grading or soil disturbance will take place. The proposed project will not substantially degrade water quality, contaminate a public water supply, substantially degrade or deplete ground water resources or interfere with ground water recharge. Water for the project will be supplied from existing lines.

The proposed project will not substantially increase impregnable surface area, as only ~~the construction of a comfort station~~, paving the existing driveway and ~~road~~ paving the enlarged parking area ~~widening~~ are proposed. Erosion or flooding caused by increased runoff will not occur.

#### c. Seismic Safety

Beverly Hills is subject to seismic activity of various types from a number of fault systems which encircle or bisect the city. The San Andreas and Newport-Inglewood systems are the most well known and considered to be the most disruptive. The Santa Monica fault is the only known fault that bisects Beverly Hills. It traverses the city about one mile south of the project site and although it is classified as "potentially active" there has been no recorded seismic activity along its traces (see figures five and six).

The Seismic Safety Element of the Beverly Hills General Plan identifies ground shaking, surface faulting and ground failure as possible modes of earthquake damage to the city. Ground shaking is the most likely to occur in Beverly Hills because it affects the largest geographical area of any type of seismic activity. Active faults such as the San Andreas (36 miles to the east) could cause ground shaking induced damage to the city. Surface faulting and ground failure are also potential problems in Beverly Hills; but, have not been recorded with the same frequency as ground shaking in the past.

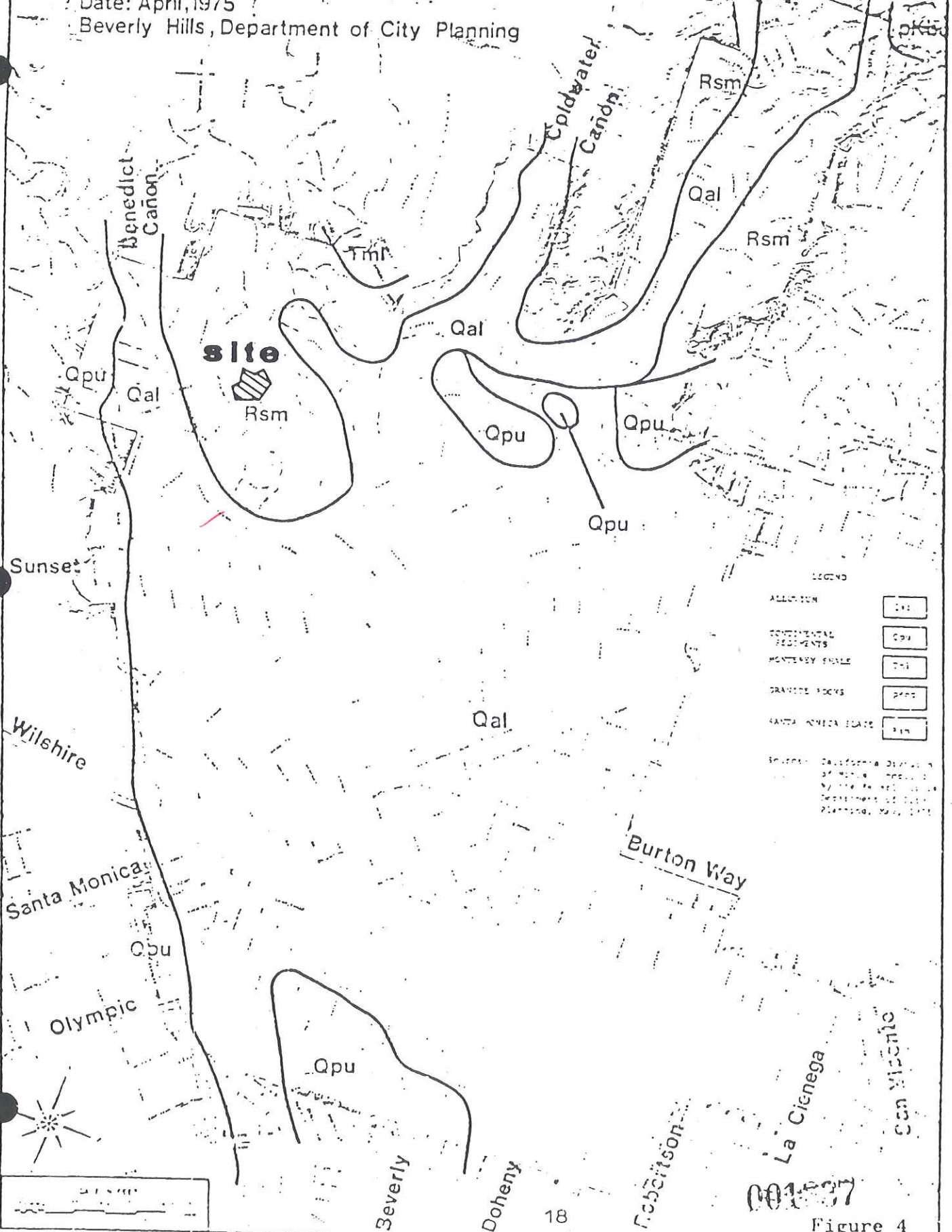
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### SECTION III

The proposed project will not expose people or structures to major geologic hazards. The nearest fault system is one mile south of the project and has not been active during recorded history. The project lies in an area of "moderate ground response" according to the County Engineer (see figure six). New construction and alterations to existing structures and facilities will be done according to all applicable Building and Safety requirements to assure the safety of arboretum visitors.

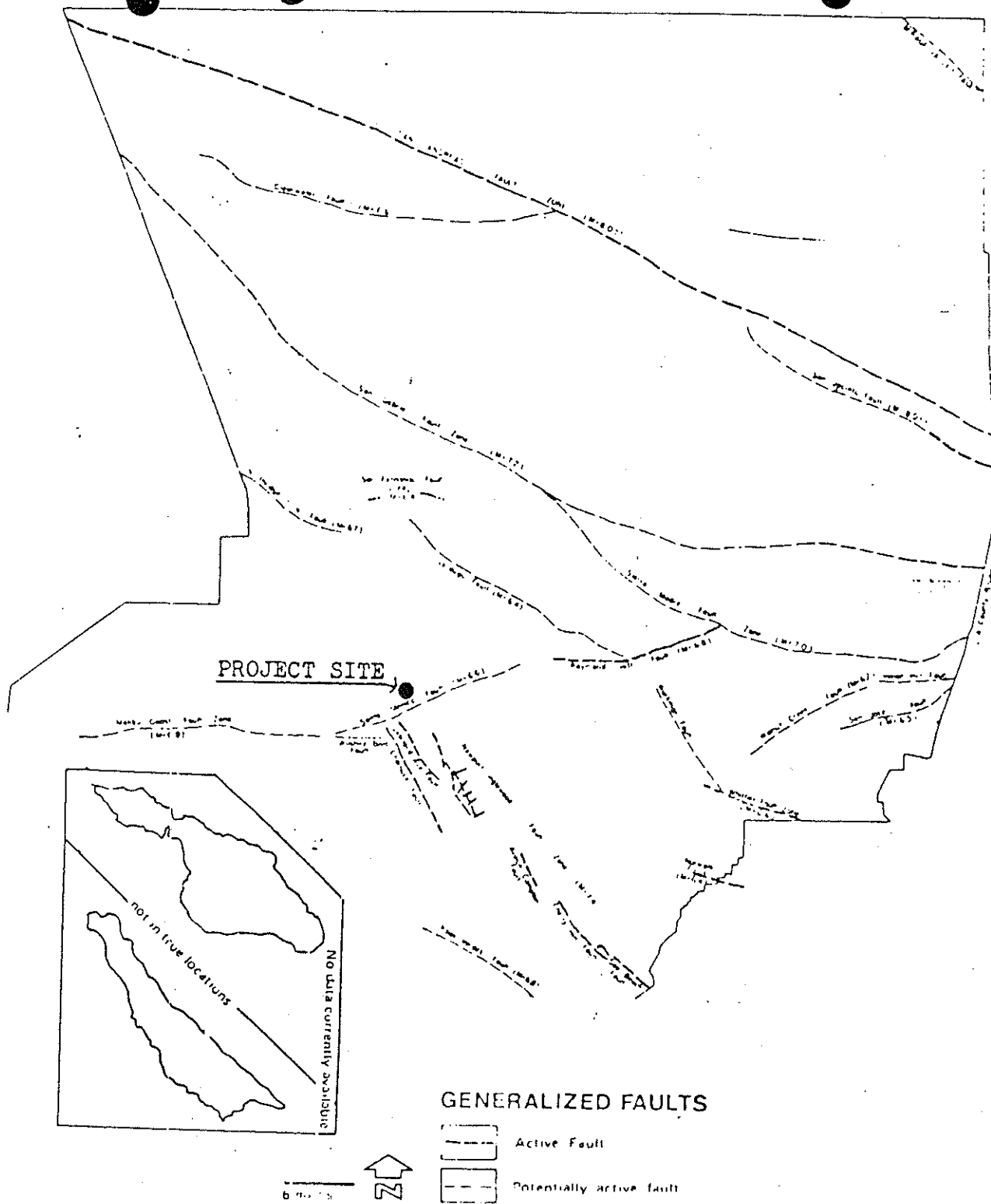
# PRINCIPAL GEOLOGIC FORMATIONS

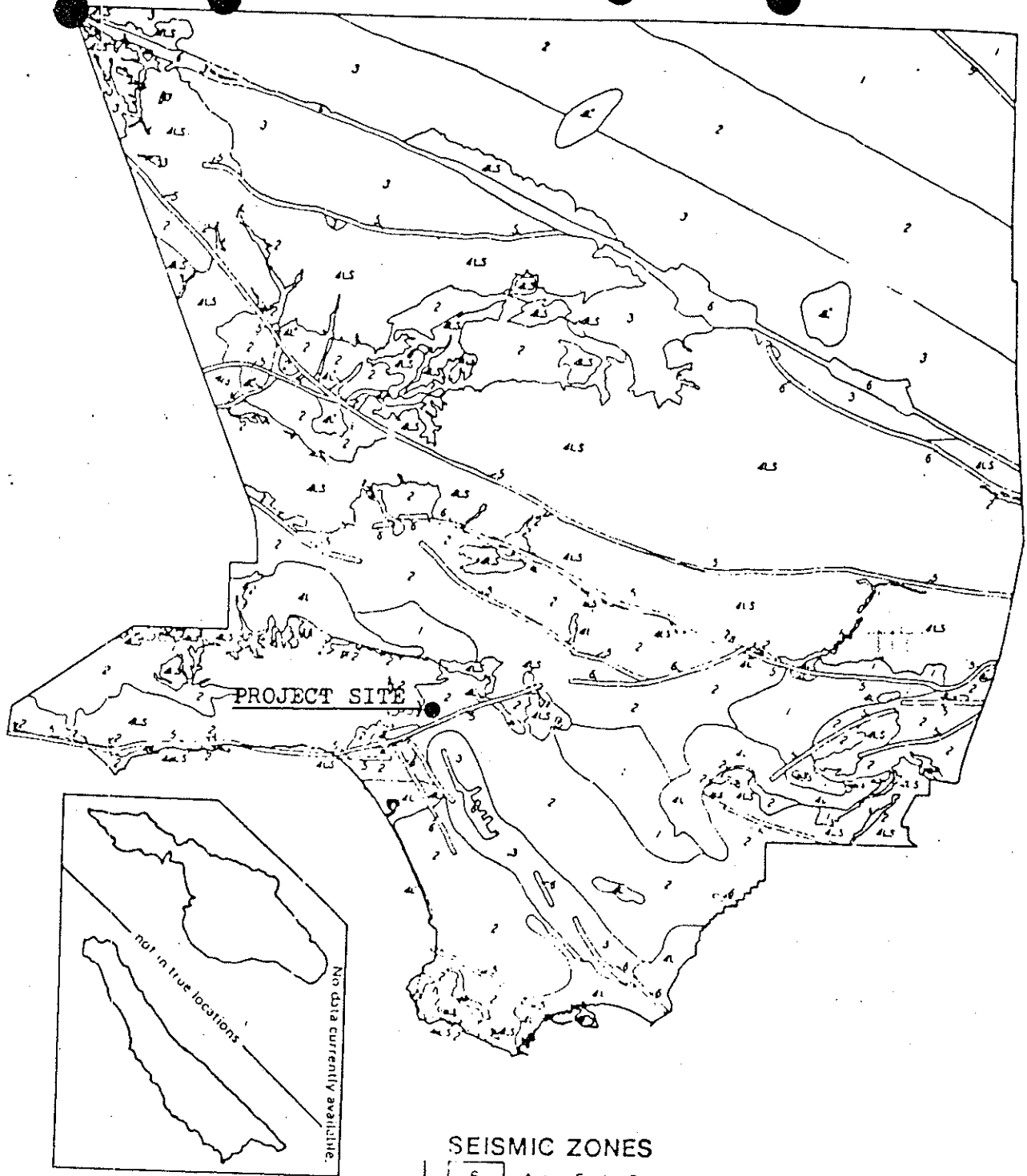
Date: April, 1975  
Beverly Hills, Department of City Planning



001-37

Figure 4





### SEISMIC ZONES

- Decreasing Damage Potential ↓
- |      |   |
|------|---|
| 6    | Active Fault. Potential ground rupture zone   |
| 5    | Potentially Active Fault: Potential ground rupture zone                                 |
| 4L   | Potential Liquefaction Zone<br>(* Historic shallow groundwater; contour depth 30 feet.) |
| 4aLs | Active Landslide  |
| 4Ls  | High Landslide Potential: Includes areas of high landslide distribution                 |
| 3    | High Ground Response Zone   |
| 2    | Moderate Ground Response Zone   |
| 1    | Low Ground Response Zone  |

SOURCES:  
Department of County Engineer  
Design Division - Engineering Technology Section.

6 miles



### SECTION III

#### d. Flora and Fauna

A partial listing of noteworthy plants existing at the Virginia Robinson Estate was completed by the Los Angeles County Department of Arboreta and Botanic Gardens (see figure seven). None of these plants is listed as being rare and/or endangered by the California Native Plant Society. One group of plants Encephalartos sp. (cycads), appears on the Federal Listing of International Trade in Endangered Species of Wild Fauna and Flora.

In addition to those plants appearing on the list in figure seven the Robinson Estate contains many common varieties of landscaping plants, such as: turf, flowering shrubs and both deciduous and evergreen trees.

The development and operation of the Virginia Robinson Gardens will not substantially affect existing plant species. The gardens will be operated as a research facility for testing, planting and demonstrating uncommon plants. ~~Minimal~~ Some plant disturbance will occur with the expansion of the existing parking area as described in Section III, A,1,a. Approximately .7 percent of the Estate area will be disturbed by this expansion. ~~when 150 lineal feet of existing drive is widened by approximately four feet. A retaining wall will be constructed to support this driveway addition.~~

The extensively landscaped gardens of the Virginia Robinson Estate probably provide habitat for a wide variety of wildlife species. ~~In addition to the pet monkey, Cobus capuchin, belonging to the late Mrs. Robinson and kept in a cage overlooking the tennis court, there are many wild species inhabiting the estate.~~

Birds were the only type of wildlife observed during site visits; Rock Doves, Columba livia, Sparrows (Fringillidae family) and Thrushes, (Turdidae family) were observed. ~~during a site visit.~~ Birds expected to occur at the site include Mockingbird, Ringed Turtle Dove and American Kestrel.

No mammals were observed at the site, but the following are likely to occur: California Ground Squirrel, Pocket Gopher, House Mouse, Norway Rat.



### SECTION III

No reptiles were observed during a site visit; however, salamander and toad species adaptive to tunneling and humid surroundings beneath rocks and tropical vegetation probably inhabit the site.

No rare or endangered species were found or are expected to occur at the site. No significant impact on plant or animal habitat is anticipated ~~will occur~~ as a result of the development and operation of the Virginia Robinson Gardens.

VIRGINIA ROBINSON GARDENS  
NOTEWORTHY PLANTS (PARTIAL LIST)

<i>Bencomia moquiniana</i>	<i>Clivia miniata</i> (Kaffir Lily)
<i>Drymis winteri</i> (Winter's Bark)	<i>Diospyros kaki</i> (Japanese Persimmon)
<i>Cheriestemon platanoides</i>	<i>Cassia leptophylla</i> (Gold Medallion Tree)
<i>Argyroxiphion virescens</i>	<i>Chamaerops humilis</i> (Mediterranean Fan Palm)
<i>Ficus religiosa</i> (Peepul, Bo-Tree)	<i>Spathodea campanulata</i>
<i>Erythrina caffra</i> (Kaffirboom Coral Tree)	<i>Talauma Hodgsonii</i> (Magnolia family)
* <i>Archontophoenix cunninghamiana</i> palm (large stands) (King Palm)	<i>Peltophorum</i> sp.
<i>Rhapis palms</i> (Lady Palm)	<i>Sterculia acerifolia</i> (Australian Flame Tree)
<i>Ficus macrophylla</i> (Moreton Bay Fig)	<i>Chamaedorea</i> spp. (Palms)
<i>Taxus baccata</i> (English Yew)	<i>Howea Forsterana</i> (Paradise Palm)
<i>Dizygotheca elegantissima</i> (Thread leaf False Aralia)	<i>Bambusa</i> (Beechey Bamboo)
<i>Brassaia actinophylla</i> (Queensland Umbrella Tree, Octopus Tree)	<i>Ginkgo biloba</i> (Maidenhair Tree)
<i>Chorisia speciosa</i> (Floss Silk Tree)	<i>Gardenia Thunbergia</i>
<i>Bauhinia blakeana</i> (Hong Kong Orchid Tree)	<i>Encephalartos</i> sp. (Cycads)
<i>Calliandra inaequilatera</i> (Pink Powder Puff)	
*This unique grove of palms is not duplicated anywhere in Southern California.	

Figure 7

### SECTION III

#### 2. Land Use

The 6.2 acre Virginia Robinson Estate consists of a main house, servant quarters, a guest house, swimming pool, tennis court and extensively landscaped gardens (see figure three).

The main residence is a 6,000 square foot single story building, with basements and an adjacent 1,700 square foot servants quarters over garages. The residence is of reinforced concrete construction, reported to have been built between 1908 and 1911.

The guest cottage is a two story building with basement. It is of reinforced concrete construction, reported to have been built in 1923. Record drawings of the building have been lost for many years. The first floor area is the only part of the building suitable for public use because of the massive alterations that would be required to open the upper floor for public occupancy.

The Robinson property is zoned R-1, Single Family Residential. The surrounding neighborhood is also zoned R-1. The proposed project will require a determination to be made by the Beverly Hills Planning Commission, pursuant to Section 65402 of the Government Code, as to the project's conformance to the General Plan. The Beverly Hills General Plan designates the project site as Single Family Residential.

The proposed project may have an impact on land use in the surrounding area. Although the Robinson Gardens will be developed primarily as a facility for testing, planting and demonstrating the natural growth of plants (see Section I.C) and public visitation will be limited and by reservation only, the change from residential to public arboretum use will nonetheless be an alteration in land use.

This land use change will not precipitate other zone changes as the site is extremely unique in the Beverly Hills area and throughout Los Angeles County. This land use change will not significantly alter the surrounding neighborhood visually, as very little development is proposed (see Section I.C). Aesthetically, the project will be difficult to see from the entrance on Elden because the proposed gardens are surrounded by dense vegetation. Parking will be provided on site, preventing the visual blight of parked cars in the neighborhood. Security lighting will be minimal and the arboretum will not operate at night, except as discussed under Section I.C.

### SECTION III

The proposed project may have an impact on the privacy of neighbors. Despite the limitation of public visitation to a reservation system, an increase in vehicular traffic will occur at certain times on Elden Way and adjacent collector streets as a result of this project. Groups touring the portions of the gardens close to neighboring uses may intrude on their privacy. In the implementation of the proposed project every effort will be made to prevent possible privacy loss (see Section III-C for further discussion).

#### 3. Circulation

The Virginia Robinson Estate is located at the terminus of Elden Way, a short cul-de-sac off Crescent Drive. Local streets in the area include Cove Way, Carolyn Way, Laurel Way, Oxford Way and Hartford Way. ~~Major~~ The most heavily traveled streets in the area are Lexington Road, Benedict Canon Drive, Beverly Drive and Sunset Boulevard (see figure two).

The information in figure eight on traffic flows in the area of the project was obtained from the City of Beverly Hills Department of Traffic and Parking, 450 North Crescent Drive, Beverly Hills, California.

All traffic entering Elden Way and the Robinson Gardens will come by way of Crescent Drive. Crescent Drive and Elden Way permit one lane of travel in each direction and on street parking on both sides of the street. Lexington Road, Benedict Canon Drive and Beverly Drive will act as arterials for the site. Lexington Road permits one lane of travel in each direction with on street parking. ~~Benedict Canon and Beverly Drive permit two lanes of travel in each direction.~~ Although the streets are marked for only one lane of travel in each direction, during rush hour Benedict Canon and Coldwater Canon Drives generally carry two lanes of vehicles in each direction.

The development and operation of the Virginia Robinson Gardens will not cause an increase in traffic, on major streets, which is substantial in relation to the existing traffic load and capacity of the streets. An increase in traffic that is substantial in relation to existing load will occur on Crescent Drive and Elden Way.

The Robinson Gardens will provide ~~24~~ 20 visitor parking spaces and will be open from ~~11~~ 10 A.M. to 4 P.M. Tuesday through Saturday. ~~on weekdays.~~ Based on these restrictions and a maximum of two reserved tours a day

### SECTION III

lasting approximately ~~1.5~~ 2 hours each, traffic flow on Elden Way and Crescent Drive may increase by ~~96 cars~~ 80 vehicle trips per day at the maximum (~~48~~ 40 vehicle trips per tour) due to visitors plus 4 vehicle trips due to employees (1 tour guide and 1 part-time custodian) for a total of 84 vehicle trips per day.

When the tennis court is converted for future parking for 24 cars, the number of vehicle trips will be increased by 88 vehicle trips per day (total of 44 on-site parking spaces) to a total of 172 vehicle trips for the one day per month on which special evening events are held, (maximum of twelve annually).

This compares to the current estimate of traffic flow on Crescent Drive of 181 cars per day in one direction of travel (see figure 8, Southbound at intersection of Lexington and Crescent), and 59 cars per day on Elden Way based on the August, 1975 City of Los Angeles EIR Guidelines of 9.82 vehicle trips per day per hillside dwelling unit; the City of Beverly Hills has no comparable guidelines.

Traffic flow on Cove Way will include a maximum of twelve vehicle trips per day due to the six gardners who will park in the lot off Cove Way (Figure 3). This same lot was used by Mrs. Robinson's gardners, who numbered 8-9; therefore, the number of vehicle trips on Cove Way should not be increased above that during Mrs. Robinson's residence.

AREA TRAFFIC COUNTS  
Virginia Robinson Gardens

<u>Location &amp; Direction</u>		<u>1974 Vehicle**</u> Count	<u>*1978 Estimated</u> Vehicle Count
Lexington Rd & Hartford Way	NB	198	210
	SB	3511	3722
	EB	1944	2061
	WB	2093	2219
<hr/>			
Lexington Rd & Crescent Dr. (1970-71 count)	NB	1290	1367
	SB	171	181
	EB	4023	4264
	WB	3339	3539
<hr/>			
Benedict Canyon Lexington	NB	10500	11130
	SB	8800	9328
<hr/>			
Beverly Dr. & & Sunset Blvd.	NB	5900	6254
	SB	6200	6572
	EB	17500	18550
	WB	17300	18338
<hr/>			
Benedict Canyon & Sunset Blvd.	NB	5800	6148
	SB	5900	6254
	EB	17500	18550
	WB	14100	14946

NB = Northbound SB = Southbound EB = Eastbound WB = Westbound

\* Facilities Department estimate assuming 1.5% increase in traffic volume per year.

\*\* According to the Beverly Hills Traffic Department, November 1979, those are the most recent vehicle counts.

Figure 8

### SECTION III

#### 4. Air Quality

The City of Beverly Hills is identified by the South Coast Air Quality Management District as being in Source Receptor Zone 2B for the measurement of air contaminants. Based on air quality data for this zone collected in 1976, the air contaminant averages on the following number of days exceeded State of California Air Quality Standards.

<u>Air Contaminant</u>	<u>Days Exceeding Standard</u>
Carbon Monoxide	21 days
Nitrogen Dioxide	55 days
Ozone	75 days

A pre-EIR air quality impact analysis was completed for the Virginia Robinson Gardens project by the South Coast Air Quality Management District on March 20, 1978. This analysis states that the proposed project will have no effect on air quality. The analysis states further that if an EIR is prepared on the proposed project no air quality analysis will be needed (see figure nine).

#### 5. Noise

The project site is subject to very low noise levels because of its isolated location at the terminus of a quiet cul-de-sac. Vegetation surrounding the site acts as a buffer to noise sources produced on surrounding streets; e.g. Cove Way, Carolyn Way.

Noise levels in the area surrounding the project site are somewhat higher. These levels were measured in January of 1975 by the Beverly Hills Planning Department in the preparation of noise contours for the Noise Element of the City's General Plan. These noise contours show that noise levels in the area surrounding the project site vary from a high of 65-69 dB(A) (measured between 11:30 A.M. and 1:30 P.M.) to a low of less than 60 dB(A) (measured at various other times during the day). The noise element of the Beverly Hills General Plan is on file with the City of Beverly Hills if more information on noise contours is desired.



South Coast  
AIR QUALITY MANAGEMENT DISTRICT

DISTRICT HEADQUARTERS  
9420 TELSTAR AVENUE EL MONTE CALIFORNIA 91731 • (213) 443-3931

RECEIVED

MAR 23 1978

A/E SERVICES  
Department of  
County Engineer-Facilities

Date 3/20/78

File No. B 80310 L

Mr. Stephen J. Koonce  
Director of Facilities  
County of Los Angeles  
550 South Vermont Avenue  
Los Angeles, CA 90020

COMMENTS ON: Virginia Robinson Gardens - Environmental  
Analysis - J.O. No.: 1013.31 FIRM No. 67776

AQMD PERMIT

- ☒ Not required  
☐ Required  
☐ May be required.  
Contact Zone Office.

POTENTIAL EFFECT ON AIR QUALITY (AQ)

- ☐ Beneficial: will probably tend to improve AQ  
☒ No effect  
☐ Impairment: probably no substantial adverse effect  
☐ Unfavorable: may degrade AQ to a significant extent  
☐ Adverse: will degrade AQ to a significant extent  
☐ Indeterminate: due to lack of data

IF AN EIR IS DONE, IS AN AIR QUALITY ANALYSIS NEEDED? ☐ Yes ☒ No ☐ NA

If you have any further questions, please call Robert Graves at (213) 443-3931, Ext. 240, Tom Mullins at Ext. 241 or myself at Ext. 238.

Very truly yours,

J. A. Stuart  
Executive Officer

*John Danielson*

John Danielson  
Senior Air Pollution Analyst

MAR 23 1978	
Facilities District	91731
South Coast	91731
Engineer-Facilities	91731



### SECTION III

The development and operation of the Virginia Robinson Gardens should not increase substantially the ambient noise levels for adjoining areas. This analysis is based on changes in expected noise levels from conditions that existed when Virginia Robinson resided on the premises. The analysis would not be valid if it were based on noise levels associated with an empty or rarely used facility.

Noise sources may include automobiles traveling to and from the site on local streets and sounds produced by tour operations. As stated in the section on circulation, the maximum increase in ~~automobile~~ vehicle trips will be approximately ~~96~~ 84 per day on Elden Way and 12 per day on Cove Way. Since Elden Way is a cul-de-sac receiving very little traffic, this estimated increase in ~~automobile~~ vehicle trips will cause some increase in ambient noise levels. However, given the limited hours of operation planned for the Gardens (10 A.M. to 4 P.M.) and the design of homes in the area (large lots with large setbacks), any increase in noise should not be perceived as substantial by residents.

To fully assess the impact of the proposed project the Los Angeles County Department of Health Services performed a Community Noise Evaluation of the Virginia Robinson Gardens on May 16, 1978. The noise evaluation was conducted at the request of the Department of County Engineer-Facilities to determine the impact of traffic noise, generated by an increase of 96 vehicle trips per day, on the adjacent residential neighborhood. This number of vehicle trips has since been modified as indicated above. This community noise evaluation, including a description of methodology, monitoring equipment used, results obtained and data sheets is located in Appendix One.

The noise evaluation in Appendix One reaches the conclusion that the proposed Virginia Robinson Gardens will not cause an adverse impact on existing community noise levels. The project will increase that noise level experienced 10% of the time ( $L_{10}$ ) by four decibels. The project will increase the Community Noise Equivalent Level ( $L_{eq}$ ) by two decibels (from 54 dB to 56 dB). This projected increase will not be noticeable to the areas' residents during the period the Robinson Gardens are open to the public. Please see Appendix One for complete information.

The Department of Health Services, on September 5, 1979, conducted a noise survey on the Robinson Estate across the street from 1027 Cove Way and also in front of 1017 Crescent Drive at the intersection of Elden Way. This data is located in Appendix Two.

### SECTION III

The Cove Way monitoring location was on an upper garden walkway, generally east of the gardeners' parking area, facing Cove Way. Noise levels were monitored between 11:00 a.m. and 12:00 noon, a period which is considered to be of sufficient time for results to be statistically valid.

Major noise sources from Cove Way were approximately fifty automobiles and trucks which passed during the monitoring period. In addition, ambient noise levels were influenced by gardeners operating power equipment on adjacent property.

The ambient noise levels recorded on Cove Way indicate that the area has a noise quality which is excellent for an urban residential environment (An Leq of 50.2 dB with a median noise level (L50) of 43 dB).

In assessing the impact of the proposed project on ambient noise levels, one must consider the change in the distribution curve of ambient noise levels caused by noise intrusions. In the case of the Robinson Gardens, the noise impact is evaluated according to the degree of shift in the ambient noise distribution curve caused by the project activities. The degree of change in the ambient noise distribution curve must significantly exceed the amount of expected daily noise fluctuations for a negative noise impact from a proposed project to occur.

A review of the noise monitoring data for Cove Way and Elden Way indicates that increased traffic on these streets which is related to the subject project will not significantly change the ambient noise distribution curve. There are several reasons for this conclusion:

- a. The number of employees on the Estate will be less than employed by Mrs. Robinson. This will reduce the number of vehicle trips and associated noise of employees automobiles.
- b. With the exception of the daily tours, seminars and other events related to the subject project will occur with less frequency than social affairs hosted by Mrs. Robinson.
- c. Traffic noise attributed to the tours will occur Tuesday through Saturday during four approximately one-half hour periods - 9:30-10:00 A.M. and 1:30-2:00 P.M. when visitors are arriving for the tours and 12:00-12:30 P.M. and 4:00-4:30 P.M. when visitors are departing after the tours.

### SECTION III

- d. The increased traffic for the maximum one-per-month special evening events will be over a short period of time as guests will arrive and depart at approximately the same time; these functions will not significantly change the ambient noise distribution curve; and all parking for these events will be on the Estate.

Noise impacts generated within the Estate are not expected to be any greater than in the past for the following reasons:

- a. The number of gardeners working and operating power equipment has been reduced.
- b. The tours will be conducted by one tour guide without the use of amplification equipment.
- c. With visitors prohibited from a large portion of the Estate's perimeter (see Figure 3), the distance between the tour groups and the neighbors property will help attenuate sounds from the Estate.
- d. The irregular topography and vegetation are natural noise damping characteristics of the site.
- e. The future tennis court parking will be used only one day per month and the existing north wall of the court will help attenuate automobile sounds.

~~Increased noise produced by tour operations will be minimal and partially absorbed by vegetation surrounding the Robinson Gardens. Where tours pass close to property lines noise levels will be higher but not substantial.~~

Construction related to the development of the Robinson Gardens will cause a short term increase in noise levels; this increase will not be noticeable when monitored utilizing accepted techniques.

Any construction associated with the project will be short-term and will reflect the type of minor construction required for adequate maintenance of similar property. The type of construction planned for the facility will not involve equipment which produces excessive noise. Most construction activities planned for the Estate is expected to last only a short time.

### SECTION III

#### 6. Cultural/Urban Development

##### a. Utilities

The project site is presently developed with all necessary utilities such as: electricity, natural gas, water and sanitary sewers.

~~These~~ Utilities will be extended ~~on~~ onto the site to provide services for ~~the new comfort station and~~ fire protection (figure 3).

Energy in the form of fossil fuel will be consumed in the construction of the project. Operation of the Gardens will consume electricity and natural gas. The amount of energy anticipated to be consumed is not significant and should not have an adverse effect on natural resources. Any increased demand on water, solid waste and sanitary sewer systems will be insignificant.

##### b. Public Facilities

Police and Fire services for the Robinson Estate are provided by the City of Beverly Hills. The closest Police Station is located 1.75 miles south of the site at City hall, 450 N. Crescent Drive. The nearest Fire Station is located .75 miles north of the site on Coldwater Canyon Drive.

The proposed project will not significantly effect the provision of police and fire services in the area.

Will Rogers Memorial Park, located one-half mile south of the proposed project, at Sunset Boulevard and Beverly Drive, and Coldwater Canon Park, located approximately one-half mile northeasterly at Coldwater Canon and Beverly Drive, ~~is~~ are the closest public parks. The proposed arboretum will not affect ~~this~~ these parks in any way.

##### c. Archaeology/Paleontology/Historical Aspects

An application for registration of the Virginia Robinson residence as a Point of Historical Interest was adopted by the Los Angeles County Board of Supervisors on February 14, 1978. The application has been forwarded to the California Historical Landmarks Committee in Sacramento for State registration.

### SECTION III

The designation "Point of Historical Interest" was initiated by the State of California to recognize officially points of local interest that do not qualify for State Historical Landmark registration. The Virginia Robinson residence is of local historical interest because of its distinction as being the first residence in Beverly Hills. The Beaux Arts, one-story white stucco home of the Robinsons' was built in 1911, when Beverly Hills consisted mainly of Barley fields. The deed for the property reads "the first residence in Beverly Hills" (Los Angeles Herald and Express, August 7, 1961, p. C-6).

A designated Point of Historical Interest is protected under State law in the same manner as State Historical Landmarks. This protection does not prevent the demolition or significant alteration of the Virginia Robinson residence by the County.

~~An application has also been made to the U.S. Department of the Interior, National Park Service for placement of the Robinson residence on the National Register of Historical Places.~~

The Robinson Estate has been placed on the National Register of Historic Places and is registered as a point of historic interest with the notation that access is restricted.

The proposed project will not alter the Robinson residence in such a manner as to violate Historical Landmark regulations. The development of the Robinson property as an arboretum is consistent with historical preservation objectives.

The U.C.L.A. Institute of Archaeology has performed an Archaeological records search for the Virginia Robinson property (see figure 10). This search shows no record of known archaeological sites in the area. However, construction relating to the development of the Robinson Gardens should be undertaken with care to prevent the loss of unrecorded sites. If at any time during construction of the project archaeological or paleontological evidence is discovered, construction should be halted while the proper authorities are given time to evaluate and excavate.

00153

10	APR 20 '78	17	1978
Facilities Development		E	1
Steaden J. Murphy			
Raymond W. Thomas			
Design & Construction			
A/E			
Gen. Admin. Serv.			
P.M.			
Management Branch			
Data Sys. Dev.			
Plan. & Insp.			
Mgmt. Sys.			
Facilities			
Prog. Analysis			
Real Property Branch			
Pl. & Eng. & Insp.			
A/E			
C/M			
R/P			
B/E			
S/M			
V/P			

000154

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SANTA BARBARA • SANTA CRUZ

page 2

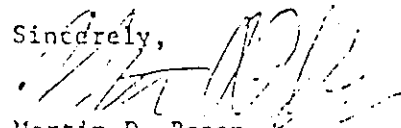
THE INSTITUTE OF ARCHAEOLOGY  
LOS ANGELES, CALIFORNIA 90024

Robinson home was built, access to the property would have been limited.  
(4) The Robinson home may have destroyed archaeological resources extant in the area. However, an assessment is impossible without first-hand knowledge of the study site.

We recommend that the property be inspected by a trained archaeologist who can ascertain whether the proposed improvements/additions to the property will have a negative impact on archaeological resources. Although development in the area will be minimal, construction which has occurred in the past does not preclude the existence of archaeological resources in the area.

Should your office have any additional questions or comments regarding the nature of this records search, please feel free to contact me at the Survey.

Sincerely,

  
Martin D. Rosen  
Survey Archaeologist  
Archaeological Survey

Enclosure: Invoice

Figure 10

001-55

### SECTION III

#### B. Significant Environmental Effects Which Cannot Be Avoided If the Project Is Implemented.

The significant environmental effects that cannot be avoided if the project is implemented are listed below:

1. An increase in traffic flow will occur on Elden Way and Crescent Drive. Traffic on these streets will increase by approximately ~~96~~ 84 vehicle trips ~~car~~ per day between the hours of ~~11~~ 10 A.M. and 4 P.M. Tuesday through Saturday. ~~on weekdays.~~ This increase compares with the current estimate of 181 cars per day traveling southbound on Crescent Drive near the Lexington Road intersection. No traffic counts are available for the northbound lane of Crescent Drive north of Lexington Road; however, they are assumed to be approximately the same as figures for the southbound lane making total traffic flow on Crescent Drive equal to approximately 362 cars per day. Although no existing traffic count is available for Elden Way, it may be assumed to be approximately 59 vehicle trips per day (using the August 1975, City of Los Angeles EIR Guidelines of 9.82 vehicle trips per day per hillside dwelling unit) with six dwellings on Elden Way, including the Robinson Estate.

The influx of ~~96~~ 84 vehicle trips ~~car~~ per day represents a ~~26%~~ 23% increase in traffic flow on Crescent Drive and 142 % increase on Elden Way. As the number of gardners parking in the Cove way lot will be less than during Mrs. Robinson's residence, there should be no increase, and possibly a decrease, in traffic on that street.

When the tennis court is converted to parking for 24 cars, there will be a total increase of 172 vehicle trips per day (84 for daytime tours and 88 for special evening events) on an average of one day per month (maximum of twelve events annually). This will represent a 48% increase in traffic flow on Crescent Drive and a 291% increase on Elden Way for one day per month.

~~This increase in traffic could be eliminated by parking cars away from the proposed project and transporting visitors by bus. This alternative seems impractical in light of the increased noise produced by buses and the lack of available land for off-site parking in the area (See Section III-D for further discussion).~~

2. The project will increase the noise level experienced 10% of the time (L<sub>10</sub>) by four decibels. The project will increase the community noise equivalent level



### SECTION III

(Leg) by two decibels (from 54 dB to 56 dB). This projected increase will not be noticeable to the areas' residents during the period the Robinson Gardens are open to the public.

3. There may be some increase in noise, traffic and visual disturbance during construction.
4. Land use at the Virginia Robinson Estate will change from private residential to public open space. An indirect effect of this may be a loss in privacy realized by neighbors in the area. A certain amount of this loss in privacy can be mitigated through design considerations in the development and operation of the proposed arboretum and botanic gardens (See Section III-D).
5. Preservation of the Virginia Robinson Estate as an Arboretum and Botanic Gardens and as a Point of Historical Interest will provide the public an opportunity to view unique and uncommon plants in an historic setting reflecting the Beverly Hills of yesteryear.

### SECTION III

#### C. Mitigation Measures Proposed to Minimize Significant Effects

The following measures are proposed to mitigate the significant effects of the proposed project. These measures are presently included in the development and operation plans for the Robinson Gardens.

1. The proposed Virginia Robinson Gardens will be open for public visitation Tuesday through Saturday ~~on weekdays~~ between the hours of ~~11~~ 10 A.M. and 4 P.M. This restriction should help ease the impact of the expected increase in traffic on Elden Way and Crescent Drive by limiting it to daylight hours.
2. The Robinson Gardens will be operated on a group reservation system whereby a maximum of two reserved tours lasting approximately ~~1.5~~ 2 hours each will be permitted daily. Traffic generated by each tour will arrive and leave the proposed gardens over a short period of time. Traffic and the corresponding traffic-generated noise, will occur Tuesday through Saturday during four approximately one-half hour periods - 9:30 to 10:00 A.M. and 1:30 to 2:00 P.M. when visitors are arriving for the tours and 12:00 to 12:30 P.M. and 4:00 to 4:30 P.M. when visitors are departing. During the tours no traffic will be generated by the project. By limiting daily visitation to acceptable levels, these restrictions will prevent parking and circulation problems and help mitigate such problems as privacy loss, precipitated by the change in land use from residential to public open space.
3. The special evening events will not conflict with the daytime tours, will be limited to a maximum of twelve events annually and all parking will be on-site.
4. Additional noise associated with the project will be mitigated by: the reduction in number of employees from that during Mrs. Robinson's residence; the distance from the tour groups to the neighboring properties, since the tours will be prohibited from much of the Estate's perimeter; and except for the tours, the fewer number of social events than during Mrs. Robinson's residence.

~~The following measures are not included in the development and operation plans for the Robinson Gardens but could reasonably be expected to reduce adverse impacts.~~

5. Where neighboring uses are extremely close to the property lines, plants have been located to grow on existing fences to help protect the privacy of the neighbors; also, in areas where neighbors' privacy may

### SECTION III

be impaired, tour groups will be prohibited (see figure 3). Garden tours can be rerouted or prohibited from other areas in the future if they prove to interfere with neighbors' privacy.

Interference with the neighbors' privacy will also be mitigated by the requirement that a tour guide be with guests at all times on tours of the Estate; guest will not be allowed to tour the grounds unescorted. ~~the existing chain link fences surrounding the Robinson property could be replaced with solid fences or vegetation. In one particular case, a swimming pool located in the backyard of a single family residence adjacent to the Robinson property is very visible from one of the brick pathways traversing the estate. Construction of solid fences in areas like this could help mitigate privacy loss experienced by neighbors as a result of the proposed project.~~

6. The increase in noise and traffic during construction will be mitigated by: requiring the contractor to adhere to a comprehensive noise abatement program; the limitation on vehicle size due to the size of the porte-cochere on the site; and the limited amount of proposed construction which will consist primarily of driveway and sidewalk paving, parking area with retaining wall, fire hydrant, and interior maintenance and repairs and future modifications to convert the tennis court to parking area. There will be no building construction. Visual disturbances and intrusion on neighbors' privacy during construction will also be mitigated by the size of the Estate, which will screen many of the construction activities, the existing vegetation and the recent landscaping installed along the property lines.

### SECTION III

#### D. Alternatives to the Proposed Project

There are three main alternatives to the proposed project considered below: 1) the "no project" alternative, 2) reduced scope, and 3) the use of an alternative design or site. The no project alternative discussion includes: a) the possibility of the City of Beverly Hills operating the Robinson property as an Arboretum, b) the possibility of the property being sold for subdivision purposes and c) the possibility of Mrs. Robinsons heirs leaving the estate as is.

##### 1. The No Project Alternative

The No Project Alternative would mean that the Virginia Robinson Estate would not be preserved and operated by Los Angeles County as an arboretum or botanical gardens. Under the terms of the agreement with Mrs. Robinson in 1974, the failure of the County to operate the property as an arboretum or botanic gardens would cause title to the property to revert to the City of Beverly Hills. In the event that the City of Beverly hills was unable or unwilling to operate the property as an arboretum, the property would then revert to Mrs. Robinson's estate and pass to the residuary beneficiaries under her will.

##### a) Operation of the Robinson Property as an Arboretum by the City of Beverly Hills

The City of Beverly hills must operate the Robinson property as an arboretum or relinquish title to the residuary beneficiaries under her will. A detailed discussion of the environmental impact of this alternative is not presented because it is assumed that basically the same impacts would occur as a result of this alternative, as would occur if the County of Los Angeles operated the arboretum.

##### b) Development of the Robinson property for subdivision purposes

It is assumed under this alternative that the residuary beneficiaries under Mrs. Robinsons Will would sell the Estate for subdivision purposes. The environmental impact of this alternative is considered below.

The 6.2 acre Virginia Robinson Estate could possibly be subdivided into eleven lots of 24,000 square feet each, under existing zoning. This estimate assumes the maximum number of lots that

### SECTION III

are legally possible and does not consider engineering hazards, such as slope and topography that could reduce the number of useable lots.

If the Robinson Estate were subdivided it would be necessary to construct a street or streets through the property because the Beverly Hills zoning ordinance requires that each single family lot have street frontage. Existing utilities would have to be extended and possibly expanded in the area to accommodate the new homes. If existing utilities could not handle the increased demand, the lines through the entire street might have to be replaced.

The Robinson Estate as it now exists would be changed considerably. Much of the unique landscaping and many uncommon species of plants would be lost due to street and housing construction. A tremendous amount of grading would have to occur to create level home sites because the topography of the estate slopes as much as 70%. Street and housing construction may require the demolition of the main residence and guest house also.

The construction of eleven single family homes on the Robinson property would have a significant effect on the surrounding neighborhood. Traffic on Elden Way and adjacent streets could increase by as much as 100 vehicle trips per day (using 9.82 vehicle trips per dwelling unit: taken from the City of Los Angeles EIR Guidelines). This represents a 28% increase in traffic over the current estimated traffic flow on Crescent Drive (see figure 8). This compares to an increase of 96 84 vehicle trips or 26% 23% caused by the daily tours of the proposed Robinson Gardens.

This alternative would produce considerable tax revenue for the City of Beverly Hills and the County of Los Angeles. At the same time, the City of Beverly Hills and the County would incur the costs of providing services to eleven single family homes. According to the City of Beverly Hills, the cost of providing the services is greater than the revenues received from single-family homes in Beverly Hills.

c) Leaving the Robinson Estate as is

This alternative assumes that the heirs of Mrs. Robinson would sell the Estate for single family use or keep the Estate and either live in it or lease it out. This alternative would eliminate

### SECTION III

all the environmental impacts discussed in this report and essentially leave the situation as is. ~~Neither the County or Beverly Hills has any control over this.~~

This alternative is very attractive from a tax revenue standpoint. In 1973, before the Board of Supervisors approved the agreement to assume possession of the Robinson Estate, the property produced \$12,900.15 in property tax revenues. Increases in assessed value since 1973 would have pushed this figure considerably higher creating increased revenues for both the County and the City of Beverly Hills. However, since 1973, and the aforementioned agreement, Mrs. Robinson has paid only a Possessory Interest Tax on the property. In 1977 this amounted to \$1,780.35.

#### 2. The Reduced Scope Alternative

The reduced scope alternative represents a discussion concerning changing the objectives of the proposed project in order to reduce environmental impacts. This discussion deals with the possibility of reducing the number of days public visitation would be allowed at the proposed arboretum. Public visitation cannot be completely denied under the terms of the County's agreement with the late Mrs. Robinson or the property would revert to the City of Beverly Hills.

Under this alternative the objectives of the proposed project would be changed to limit public use of the Virginia Robinson Gardens to three days a week. This alternative would have the effect of reducing many of the environmental impacts discussed in relation to the project as originally proposed. For example, traffic flow on Elden Way and Crescent Drive would be reduced from the estimated maximum figure for five days, of ~~240~~ 420 vehicle trips, to a maximum for three days, of ~~144~~ 252 vehicle trips. Fewer visitors to the proposed arboretum would have the effect of reducing privacy loss experienced by neighbors.

At the same time this alternative may have the effect of limiting many of the benefits of the proposed arboretum. The Arboretum Education program with its tours for biology, botany and horticulture classes would be limited to three days of every week. These three days would have to be shared with other groups and organizations wishing to tour the proposed arboretum. With the planned operating hours of ~~11~~ 10 A.M. to 4 P.M., only six tours a week would be possible at the proposed arboretum. Seemingly, this restriction in tours makes this alternative unattractive.

## SECTION III

### 3. Alternate Site or Design

This alternative does not consider the use of an alternative site for the development of an arboretum because the Virginia Robinson Estate is considered to be extremely unique in plant variety and species type. Also, the availability of six acres of undeveloped land in the urban area of Los Angeles County is extremely rare.

This alternative deals with the possibility of changing the design of the proposed arboretum in order to reduce environmental impacts. Since automobile traffic entering and leaving the arboretum is a major environmental concern, the possibility of locating the parking away from the site and busing patrons ~~should be~~ has been considered by the Department of Arboreta and Botanic Gardens.

Under this alternative the parking lot for the project would be located away from the residential area, either at an existing County facility or at a newly constructed lot. Patrons would then be bused from the lot to the site on a scheduled basis.

This alternative would drastically reduce the projected increase in vehicle trips on Elden Way and Crescent Drive. Any traffic increase would be limited to arboretum vehicles and buses making the trip between the parking lot and the project site.

This alternative is unacceptable to the Department of Arboreta and Botanic Gardens, which does not want to get involved in the logistics and cannot afford the costs of such an operation. In addition, buses cannot negotiate the porte-cochere beneath the servants' quarters, thus requiring all visitors to the Estate to be loaded and unloaded at the sidewalk and causing an increase in noise near neighboring uses; parking is very limited at the nearest County facilities, the West Hollywood Library and Sheriff Station; and the Arboretum cannot afford the purchase and development of remote parking lots.

~~This alternative seems unacceptable when logistics and costs are considered. For a bus to enter the Virginia Robinson Estate and turn around alterations would have to be made to the arched drive beneath the eastern portion of the main residence. Currently, a bus would not fit through this driveway beneath the servants' quarters. To alleviate this problem bus passengers could be unloaded on the street in front of the Robinson property, but, this would cause an increase in noise on the street near neighboring uses.~~

### SECTION III

~~The nearest County facility for parking patron's cars is the West Hollywood Library and Sheriff Station, located approximately three miles distant on San Vicente Boulevard. Parking at these facilities is limited.~~

~~Parking space could be rented, but this would be expensive and could force the County to be unable to operate the Estate as an arboretum.~~

~~The possibility of purchasing land and developing a parking lot in the area of the proposed project seems unacceptable. The cost of land in Beverly Hills is extremely high and very few vacant sites exist. Purchase and development costs would be even higher if land for the parking lot had to be condemned and the current occupants relocated. This is the most likely situation because of the lack of vacant land.~~

001264



### SECTION III

#### E. The Growth Inducing Impact of the Proposed Project

The proposed project is not likely to generate growth in the Beverly Hills area. This area is a well established, urbanized area with little possibility for future expansion or growth within the vicinity of the proposed arboretum.

The nature of the proposed arboretum makes it an unlikely generator of growth. While, the addition of open space in an area usually increases its attractiveness to people seeking homes, the area surrounding the project site tends to draw only a select group of upper income people who can afford the high price of housing and taxes. The lack of vacant land in the immediate vicinity of the proposed arboretum limits any growth that could possibly occur.

001255

#### SECTION IV - ORGANIZATIONS AND PERSONS CONSULTED

The following organizations and individuals were consulted during the preparation of this report:

A. Los Angeles County Departments

Department of Arboreta and Botanic Gardens  
County Counsel  
Department of County Engineer-Facilities  
Department of Regional Planning  
Department of Health Services  
Chief Administrative Office  
Historical Landmarks Committee  
Museum of Natural History  
Assessor's Office

B. Other Organizations and Individuals

City of Beverly Hills Planning Department  
City of Beverly Hills Department of Traffic and Parking  
South Coast Air Quality Management District  
U.C.L.A. Institute of Archaeology

APPENDICES

601257

APPENDIX 1

DEPARTMENT OF HEALTH SERVICES  
ENVIRONMENTAL MANAGEMENT

COMMUNITY NOISE EVALUATION  
OF THE  
VIRGINIA ROBINSON GARDENS  
BEVERLY HILLS

MAY 16, 1978

00188

### Purpose of Study

The community noise evaluation was conducted at the request of the County Engineer to determine the impact of traffic noise generated by the Virginia Robinson Gardens on the adjacent residential neighborhood.

### Location

The actual noise measurements were made at 1003 Elden Way, approximately 200 feet south of the entrance gate to the Gardens. This site was selected because it accurately reflects the impact of motor vehicle noise along Elden Way to the entrance gate of the Gardens.

### Monitoring Equipment

The noise study was conducted utilizing the Bruel & Kjaer 4426, Noise Level Analyzer, equipped with microphone type 4145.

### Methodology

Ambient noise levels were measured at 1003 Elden Way for a period of twenty (20) minutes between 11:40 a.m. and 12:00 p.m. The sampling frequency was five (5) per second for a total sample size of 6000. From this sample various statistical noise levels were determined. In addition, the  $L_{eq}$ , distribution, distribution %, and cumulative % were recorded.

The determination of the impact of traffic noise was a fairly simple matter since only 24 cars would enter or leave the Gardens during any particular hour. (In fact, this will occur only 4 times per day.) The traffic impact was calculated by measuring the distribution of noise from cars (24 vehicles) driving on Elden Way and adding this distribution to the total ambient distribution adjusted for an one hour period. The increase in various statistical noise levels due to a change in the

Methodology (con't.)

distribution above the ambient distribution is the impact of traffic noise attributed to the project on ambient noise levels.

Results

Tables I and II summarize the monitoring data.

The following table is a summary of the impact of traffic noise attributed to the subject project:

	PRESENT NOISE LEVELS	PROJECTED NOISE LEVELS FROM PROJECT TRAFFIC NOISE
L <sub>eq</sub>	54 dB	56 dB
L <sub>90</sub>	45	45
L <sub>50</sub>	47	47
L <sub>10</sub>	54	58

The results of the study indicate that the project will increase those noise levels which occur more than 10% of the time; however, the median and background noise levels will remain unchanged.

Conclusion

The Department estimates that the subject project will not cause an adverse impact on existing community noise level; however, the project will increase that noise level experienced 10% of the time (L<sub>10</sub>) by 4 decibels. This projected increase will not be noticeable to the area's residents during the period that the Gardens are open to the public.

DEPARTMENT OF HEALTH SERVICES ENVIRONMENTAL MANAGEMENT  
COMMUNITY NOISE SURVEY DATA SHEET

Sheet 1 of 2  
Date 16 May 1978  
Day S M T W T F S

By: Gomez/Bellomo Site No. \_\_\_\_\_  
SITE NO. \_\_\_\_\_ LOCATION 1003 ELDEN, Beverly Hills

EQUIPMENT:

Type: B&K 4426

Weighting: A C Flat

Fast / Slow / 5 per second

Microphone Height: 4 Feet

Type of Sample: 24 hrs. 1 hr. 20 min/other

WEATHER:

Wind Speed \_\_\_\_\_ Direction \_\_\_\_\_

Temp. \_\_\_\_\_ Rel. Hum. \_\_\_\_\_

Other \_\_\_\_\_

RUN	DURATION	TIME		SAMPLE SIZE					
		FROM	TO		L <sub>10</sub>	L <sub>50</sub>	L <sub>90</sub>	L <sub>min</sub>	L <sub>20</sub>
1	20 minutes	1140	TO 1200	6000					
2			TO						
3			TO						
RUN	L <sub>max</sub>	L <sub>1</sub>	L <sub>10</sub>	L <sub>50</sub>	L <sub>90</sub>	L <sub>max</sub>	L <sub>min</sub>	L <sub>20</sub>	
1	74.3	65.3	53.5	47.8	45.3	43.8		53.9	
2									
3									

001371

# COMMUNITY NOISE ANALYSIS

Site No. \_\_\_\_\_

Date: 16 May 78

Address: 1003 Elden, Beverly Hills

<u>dBA</u>	<u>Distribution %</u>	<u>Cumulative %</u>
36	_____	_____
38	_____	_____
40	_____	_____
42	2.0	99.8
44	18.4	97.8
46	32.9	79.3
48	22.1	46.2
50	11.2	24.1
52	3.3	12.8
54	2.2	9.3
56	1.3	7.0
58	1.4	5.7
60	1.2	4.1
62	1.0	2.8
64	0.9	1.7
66	0.4	0.8
68	0.0	0.2
70	0.0	0.2
72	0.0	0.1
74	0.1	0.1
76	0.0	0.0
78	_____	_____
80	_____	_____
82	_____	_____

001272



APPENDIX TWO

NOISE MONITORING DATA

Site Number 1: September 5, 1979

Location: 1008 Elden Drive; upper walkway above animal shed and garage  
across the street from 1027 N. Cove Way

Time: 11:00 - 12:00 a.m.

$L_{eq}$	- 50.2 dB	LNP - 62.3 dB
$L_{90}$	- 40 dB	
$L_{50}$	- 43 dB	
$L_{10}$	- 51 dB	

Maximum decibel level: 76.1 dB  
Mean decibel level: 44.8 dB

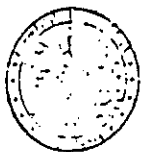
Site Number 2: September 5, 1979

Location: In front of 1017 Crescent Drive at intersection of Elden Way

Time: 1:03 - 1:53 p.m.

$L_{eq}$	- 60.9 dB	LNP - 81.0 dB
$L_{90}$	- 44 dB	
$L_{50}$	- 55 dB	
$L_{10}$	- 65 dB	

Maximum decibel level: 78.6 dB  
Mean decibel level: 54.9 dB



## COUNTY OF LOS ANGELES

### ARBORETA AND BOTANIC GARDENS

301 NORTH BALDWIN AVENUE, ARCADIA, CALIFORNIA 91006  
TELEPHONE: 446-9281 OR 681-7718

FRANCIS CHING  
DIRECTOR

#### Plant-Introduction Program

Department of Arboreta and Botanic Gardens

January 1, 1971

Introduction and testing of individual plant species from different parts of the world is a major function of the Department of Arboreta and Botanic Gardens and must be fully supported by the entire Department. Although most research is the domain of universities and research institutes, plant introduction and testing of introduced material is generally considered to be a main function of arboreta and botanical gardens. A necessary part of any balanced plant-introduction program is that scientific studies of introduced plants must be made and careful records must be reported and recorded in order to evaluate introduced material.

The Plant-Introduction Program is strengthened by the fact that close to 99% of the material planted around homes, in parks, along streets, etc., in southern California is exotic. Introduced species have proved to be superior to the elements of the local environment in many respects, but there is a great deal of room for improvement. Ornamental value is of prior concern with other features such as adaptability to our climate, resistance to disease, insect

and drought all important considerations to the enrichment of the horticultural flora in our area. For further improvement of introduced species, a plant breeding program will be incorporated into the Plant-Introduction Program.

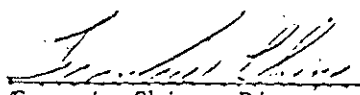
Descanso Gardens and South Coast Botanic Garden will both be an integral part of the Plant-Introduction Program.

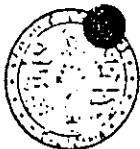
The following are objectives for the Departmental Plant-Introduction Program to December 31, 1979:

- 1) The seed exchange program with domestic and foreign arboreta and botanical gardens will be continued at the present level to December 31, 1971, at the 50% level to December 31, 1974, and at the 25% level to December 31, 1979.
- 2) An attempt will be made to establish seed exchange programs with arboreta and botanical gardens in Mexico, South America and southern U.S.S.R.
- 3) The present test-growing system will be improved by emphasizing selectivity and quality rather than quantity.
- 4) Attempts will be made to acquire additional acreage for the purpose of mass planting of new material in rows for testing and selection purposes.
- 5) Mass plantings of selected items of horticultural value will be carried out extensively throughout the Arboretum, Descanso Gardens and South Coast Botanic Garden, especially along roadways.

- 6) The Arboretum, Descanso Gardens and South Coast Botanic Garden will each specialize in a limited number of genera of horticultural value such as eucalyptus, callistemon, mealeuca, magnolia, and groups of cassia, acacia, viburnum, ilex, erythrina, camellias, pinus, pittosporum, juniperus, flowering trees from South America, roses, palms and ground covers.
- 7) Plants already on the grounds for many years will be re-examined for their horticultural values in accordance with our stated objectives. A regular turn-over of plantings is needed for future development. Plants, found to be horticulturally undesirable, will be replaced and this practice will be carried out in the future on a regular basis.
- 8) The Display Garden area and area designated for the Phylogenetic Garden will be expanded for the Asiatic/North American Plant Collections which would include all available species, varieties and cultivars of magnolia; the most beautiful ones planted en masse. The objective for this is to create in 10 years a most complete and beautiful Magnolia Garden west of the Mississippi.
- 9) The jungle will be preserved as it is although it would be desirable to plant giant clump type bamboos in this area. It is one of the focal points of the Arboretum. Being unique, it is frequently visited by individuals, school groups and, particularly, by the under 14 generation. It is also used for teaching purposes by the Arboretum's Youth Education Section.

- 10) The native oaks in the Australian Section will be removed as necessary so as to provide for additional planting areas for Australian plants. The native oaks on Tallac Knoll will be retained as this is one of the last significant stands of Englemannii oaks in the Los Angeles area.
- 11) An effort will be made to expand the palm collection.
- 12) The bamboo collection, especially the prolific runners, will be drastically reduced to allow for further addition to the palm collection.
- 13) The dwarf citrus, avocados and fruit trees west of the Hugo Reid parking lot will be removed as they serve no useful purpose and the area used for plantings of South American material.
- 14) The remainder of the Hugo Reid lot will be redesignated as a testing area for the Research Division projects, including the Plant-Introduction Program.

  
Francis Ching, Director



FRANCIS CHING  
DIRECTOR

COUNTY OF LOS ANGELES  
ARBORETA AND BOTANIC GARDENS

301 NORTH BALDWIN AVENUE, ARCADIA, CALIFORNIA 91006  
TELEPHONE: 446-8251 OR 681-7718

Procedures on Acquisition, Accessioning and Record Keeping

Plant-Introduction Program

Department of Arboreta and Botanic Gardens

January 1, 1971

- 1) All plants, seeds, cuttings and bulbs that are to be grown for the permanent collection at the Arboretum, South Coast Botanic Garden, Descanso Gardens or in any other Department facility must be accessioned, with the exception of annuals for display purposes and temporary material used for research.
- 2) Plant introduction material for the permanent collection can be brought in or accepted by the following persons: Director, Assistant Director, Taxonomist, Superintendent: Arboretum, South Coast Botanic Garden, and Descanso Gardens.
- 3) All plant introduction material intended for the permanent collections must be approved by the Taxonomist before accessioning, and must be reported to the Plant Recorder. The Taxonomist will be responsible for determining the number of plants to be grown and at which facilities they will be planted.
- 4) After exchange Index Seminum have been checked, the Plant Recorder will check for items that may already exist in our collection. In such cases, the Taxonomist will be notified and a decision will be made on acquisition.

Los Angeles State and County Arboretum  
Arcadia

Descanso Gardens  
La Canada

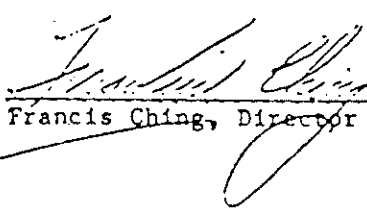
South Coast Botanic Garden  
Palos Verdes Peninsula

00178

Procedures on Acquisition, Accessioning and Record Keeping  
Plant-Introduction Program  
Department of Arboreta and Botanic Gardens  
January 1, 1971

- 5) Accessioning and keeping accession lists is the responsibility of the Plant Recorder.
- 6) The Plant Recorder is responsible for supplying the following data on accession cards: a) Name of the plant, b) Family, c) Country of origin, d) Source, including the collection data if available, e) Introducer, f) Accession date, g) Accession number, and later, after receiving data from the nursery and field, h) Planting date, i) Germination date, j) Planting-out date, k) Location, l) First-flowering date, and m) First-fruitlet date.
- 7) Reporting 6h) and 6i) to the Plant Recorder is the responsibility of the Head Nurseryman.
- 8) Reporting 6j), 6k), 6l) and 6m) to the Plant Recorder is the responsibility of the Assistant Superintendent.
- 9) Before plants are taken out from the nursery to their permanent location a metal accession number label must be attached to each plant.
- 10) In addition to a metal accession number label for each plant, one plant of the group must also have a metal name label with the following information: Accession number, name, family and the country or area of origin.
- 11) Making of both plastic and metal labels is the responsibility of the Plant Recorder.
- 12) Requesting labels before the plants are taken out is the responsibility of the Head Nurseryman.

- 13) Requesting new metal labels, if these are lost or stolen after planting, is the responsibility of the Assistant Superintendent. If the plants cannot be recognized or identified, the Taxonomist should be contacted immediately.
- 14) Making reports to the Plant Recorder, should the plants die, is the responsibility of the Assistant Superintendent.
- 15) This accessioning procedure as outlined above applies to the Arboretum, South Coast Botanic Garden, Descanso Gardens and all other Department facilities. This means that the plants and plant material when ordered or accepted by the Superintendents of the Arboretum, South Coast Botanic Garden and Descanso Gardens for their permanent collections must be accessioned by the Arboretum's Plant Recorder and will be included in the Arboretum's inventories. All plant material for these facilities will be grown at the Arboretum nursery. Plants established in three inch pots will be transferred to South Coast Botanic Garden while Descanso Gardens will not receive plants until they are established in one gallon cans.

  
Francis Ching, Director





FRANCIS CHING  
DIRECTOR

COUNTY OF LOS ANGELES  
DEPARTMENT OF  
ARBORETA AND BOTANIC GARDENS

1101 NORTH BALDWIN AVENUE, ARCADIA, CALIFORNIA 91006

TELEPHONE 446-8251

Plant Collections Program

A Supplement to the  
Plant Introduction Program

June 1, 1977

Plants and plant collections form the foundation for all arboreta and botanic gardens. The value of any plant collection is reflected in its purpose and use, be it for research and/or educational programs which ultimately results in various kinds of values to people and the community in which the institution is located.

Because much of the climate of Southern California is arid or semi-arid, the plant collection policy of the Los Angeles County Department of Arboreta and Botanic Gardens takes on a greater importance than usually found at arboreta and botanic gardens. The following is therefore the expressed guidelines for Plant Collections of the Department:

1. Plant collections are for the purpose of observing and determining those plants that are suitable and adaptable to Southern California. Flowering plants are highly desirable although selections need not be limited to this criteria. Special consideration for selection purposes includes the resistance of plants to insects and diseases thereby reducing the need for the use of insecti-

cides and fungicides as well as plants that are drought tolerant with erosion control properties.

2. Plant collections are coordinated and maintained through the Plant Introduction Program as documented. Plants for testing and display are located in geographical and other sections including the following:

Australian

South African

Mediterranean

Asiatic/North American

South American

Palms and Bamboo

3. The following are the major collections of the Department:

Acacia

Begonia

Brachychiton

Callistemon

Camellia

Cassia

Cycadaceae

Erythrina

Eucalyptus

Ficus

Lagerstroemia

Magnolia

Melaleuca

Orchidaceae

Palmae

Pittosporum

Tabebuia

Viburnum

4. Plant collections are incorporated into specialized educational displays for the general public so that they may become more knowledgeable of the significance of plants and their many uses. These displays include the following:

Groundcover Display	Meadowbrook
Turfgrass Display	Prehistoric and Jungle Garden
Juniper Display	Drought Tolerant Ground-cover Display
Herb Garden	Vine Display
Tropical Greenhouse	Begonia and Orchid Display
Demonstration Home Gardens	Garden For All Seasons
Aquatic Gardens	

5. Collections for taxonomic, botanical, and other scientific or educational purposes are acceptable as requested or required. Once the studies are concluded, the collections will not be retained unless there are other educational or research values to be obtained.
6. Plants that are selected because of their desirability and adaptability to Southern California are made available to the general public through the nursery industry and the California Arboretum Foundation.

---

Francis Ching, Director

001-53

COMMENTS RECEIVED ON THE  
DRAFT ENVIRONMENTAL IMPACT REPORT

LIST OF THOSE SUBMITTING WRITTEN COMMENTS:

Mr. Francis Ching  
Mrs. A. A. Gillespie  
Dr. Frank T. Pierce, Jr.  
Mr. Sam Berkman  
Mr. Lawrence G. Barnes  
Mr. Melvin Hirsh  
Dr. & Mrs. E. C. Rigby  
Mr. Jerry Lushing  
Mr. Dick Martin  
Mr. Sam Berkman  
Ms. Roslyn K. Berkman  
Mr. & Mrs. David Comsky  
Mr. & Mrs. Norman Lee  
Mr. Arthur N. Greenberg  
Hon. Joseph N. Tilem



301 NORTH BALDWIN AVENUE, ARCADIA, CALIFORNIA 91006  
TELEPHONE: (213) 446-8251

UNIT FARMER-FACILITIES  
SJK 1.1/1 JTR  
HD A JTR

JUN 28 4 02 PM '73

(WJ) \_\_\_\_\_ DYM \_\_\_\_\_ PAP \_\_\_\_\_  
REF TO \_\_\_\_\_  
APT \_\_\_\_\_ PREP REPLY \_\_\_\_\_

June 26, 1978

RECEIVED

JUN 20 1978

A/E SERVICES  
Department of  
County Engineer-Facilities

Mr. Stephen J. Koonce  
County Engineer-Facilities  
550 S. Vermont  
Los Angeles, Ca. 90020

Dear Mr. Koonce:

Subject: Draft Environmental Impact Report --  
Virginia Robinson Gardens

We have reviewed the subject report and wish to make the following suggestion which will further mitigate the environmental impact of the proposed site development of the gardens.

Rather than converting the existing tennis court for guest parking as proposed, guest parking could be provided by expansion of the service parking area at the end of the service road. This can be accomplished with no disturbance to any improvements on the grounds and insignificant changes in the gardens.

Thank you for this opportunity to comment on the report.

Very truly, yours,

Francis Ching  
Director

FC: jlk

[illegible]

DESIGN & CONSTRUCTION BRANCH		Action	Info.
BARMACK	hb		
Architect-Engineer		X	
Civil Engineering			
Project Management			
File			

LOS ANGELES STATE & COUNTY ARBORETUM  
ARCADIA

DESCANSO GARDENS  
LA CANADA

001 SOUTH COAST BOTANIC GARDEN  
PALOS VERDES PENINSULA



STEPHEN J. KOONCE  
COUNTY ENGINEER

RAYMOND W. LOOMIS  
Assistant County Engineer

COUNTY OF LOS ANGELES  
DEPARTMENT OF COUNTY ENGINEER-FACILITIES  
550 SOUTH VERMONT, LOS ANGELES, CA 90020

(213) 738-2011

February 15, 1980



BOARD OF SUPERVISORS

PETER F. SCHABARUM  
KENNETH HAHN  
EDMUND D. EDELMAN  
YVONNE BRATHWAITE BURKE  
BAXTER WARD

Mr. Francis Ching, Director  
Arboreta and Botanic Gardens  
301 North Baldwin Avenue

Dear Mr. Ching:

DRAFT ENVIRONMENTAL IMPACT REPORT  
THE VIRGINIA ROBINSON GARDENS

Your letter dated June 26, 1978, contained specific comments regarding your review of the aforementioned project. Your comments and our response to those comments are as follows:

"... Rather than converting the existing tennis court for guest parking as proposed, guest parking could be provided by expansion of the service parking area at the end of the service road. This can be accomplished with no disturbance to any improvements on the grounds and insignificant changes in the gardens."

As you suggested, guest parking, for the daily tours, will be accommodated by expanding the existing visitor parking area at the end of the driveway. The tennis court parking will be used for special evening events only, not for the daily tour parking which will be limited to twenty vehicles. There will be a maximum of twelve special evening events annually with all parking on site.

Very truly yours,

*for H. Barnack*  
STEPHEN J. KOONCE  
County Engineer

SJK:mm 22

001:85

Mrs. A. A. Gillespie  
1035 Carolyn Way, Beverly Hills, California 90210

June 28, 1978

Mr. Stephen J. Koonce  
County of L.A., Sept. of County Engineer-Facilities  
550 South Vermont Ave.  
Los Angeles, Ca. 90020

Dear Mr. Koonce:

As you can see my from address, I border the Virginia Robinson Gardens. Naturally, I read your report regarding the environmental impact very carefully, since the largest part of my property borders on the Estate.

First of all, the rather shabby metal fence is of no protection for the Estate or my property. If the Arboreta and Botanic Gardens are established there, I think it very necessary to have a ten foot solid fence replace the present one. As it is now, I would have no privacy when I swim or garden.

I am sure with your very careful survey of the situation, you will agree that this is a very important factor in my future in this house.

JUL 6 1978

Sincerely,

Mrs. A. A. Gillespie

LJK - ✓ 7  
H.B.



STEPHEN J. KOONCE  
County Engineer

HAYMOND W. LOOMIS  
Assistant County Engineer

JAMES T. ROSTRON  
Assistant County Engineer

COUNTY OF LOS ANGELES  
DEPARTMENT OF COUNTY ENGINEER-FACILITIES  
550 SOUTH VERMONT, LOS ANGELES, CA 90020

(213) 974-1511



BOARD OF SUPERVISORS

PETER F. SCHABARUM  
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EDMUND D. BOELMAN  
JAMES A. HAYES  
BAXTER WARD

July 18, 1978

Mrs. A. A. Gillespie  
1035 Carolyn Way  
Beverly Hills, CA 90210

Dear Mrs. Gillespie:

VIRGINIA ROBINSON GARDENS  
1008 ELDON WAY BEVERLY HILLS  
SPEC. NO. 3987--C.P. NO. 67776

Thank you for your letter of June 28, 1978 in response to the environmental document prepared by this Department for the Virginia Robinson Gardens.

It is our understanding in discussion with Arboreta staff that funds for the proposed improvements and public use of the gardens are not available. However, at such time as this project is funded your concern for privacy fencing will be considered.

If you have any further questions, please contact Mr. Neil Sorensen at 974-9264.

Very truly yours,

STEPHEN J. KOONCE  
County Engineer

*J. Mayhew/for*  
Zell S. Van Myers, A.I.A.

Assistant Deputy Director  
A/E Division

SJK:ZVM  
DCM:ee

cc: Mr. Roy Ito  
Arboreta & Botanic Gardens

001: 88





STEPHEN J. KOONCE  
COUNTY ENGINEER

RAYMOND W. LOOMIS  
Assistant County Engineer

COUNTY OF LOS ANGELES  
DEPARTMENT OF COUNTY ENGINEER-FACILITIES  
550 SOUTH VERMONT, LOS ANGELES, CA 90020

(213) 738-2011



BOARD OF SUPERVISORS

PETER F. SCHABARUM  
KENNETH HAHN  
EDMUND D. EDELMAN  
YVONNE BRATHWAITE BURKE  
BAXTER WARD

February 15, 1980

Mrs. A. A. Gillespie  
1035 Carolyn Way  
Beverly Hills, California 90210

Dear Mrs. Gillespie:

DRAFT ENVIRONMENTAL IMPACT REPORT  
THE VIRGINIA ROBINSON GARDENS

We stated in our letter of July 18, 1978, in response to your letter of June 28, 1978, that your suggestion for solid private fencing would be considered at a later date. At this time no solid fencing is planned for the boundaries of Virginia Robinson Gardens due to funding restraints as well as strong objections to solid fencing from other neighbors of the Gardens.

The Department of Arboreta and Botanic Gardens has located plants along the property lines to grow on the existing fencing. Also, as indicated in the attached Figure 3 from the Final EIR, public tours will be prohibited from certain areas of the Estate where neighbor's privacy may be violated. These items are reflected in the Final EIR as follows:

The following has been added to Section I, C, Description of Project:

"To protect the privacy of the neighbors, the following plants have been located as required along the property lines of the Estate:

Cissus antartica - evergreen grape.

Cupressocyparis leylandii - evergreen tree.

Prunus caroliniana - Evergreen shrub.

Myoporum laetum - Evergreen shrub.

"Also, public tours will be prohibited from portions of the Estate to protect the privacy of the neighbors (Figure 3)."

001:89

Mrs. A. A. Gillespie

-2-

February 15, 1980

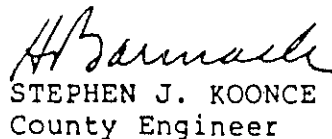
The discussion of solid fences has been deleted from consideration and from Section III, C, Mitigation Measures Proposed to Minimize Significant Effects.

Section III, C, Mitigation Measures Proposed to Minimize Significant Effects has been revised to read as follows in the Final EIR:

"Where neighboring uses are extremely close to the property line, plants have been located to grow on existing fences to help protect the privacy of the neighbors; also, in areas where neighbors' privacy may be impaired, tour groups will be prohibited (see Figure 3). Garden tours can be rerouted or prohibited from other areas in the future if they prove to interfere with neighbors' privacy.

"Interference with the neighbors' privacy will also be mitigated by the requirement that a tour guide be with guests at all times on tours of the Estate; guest will not be allowed to tour the grounds unescorted."

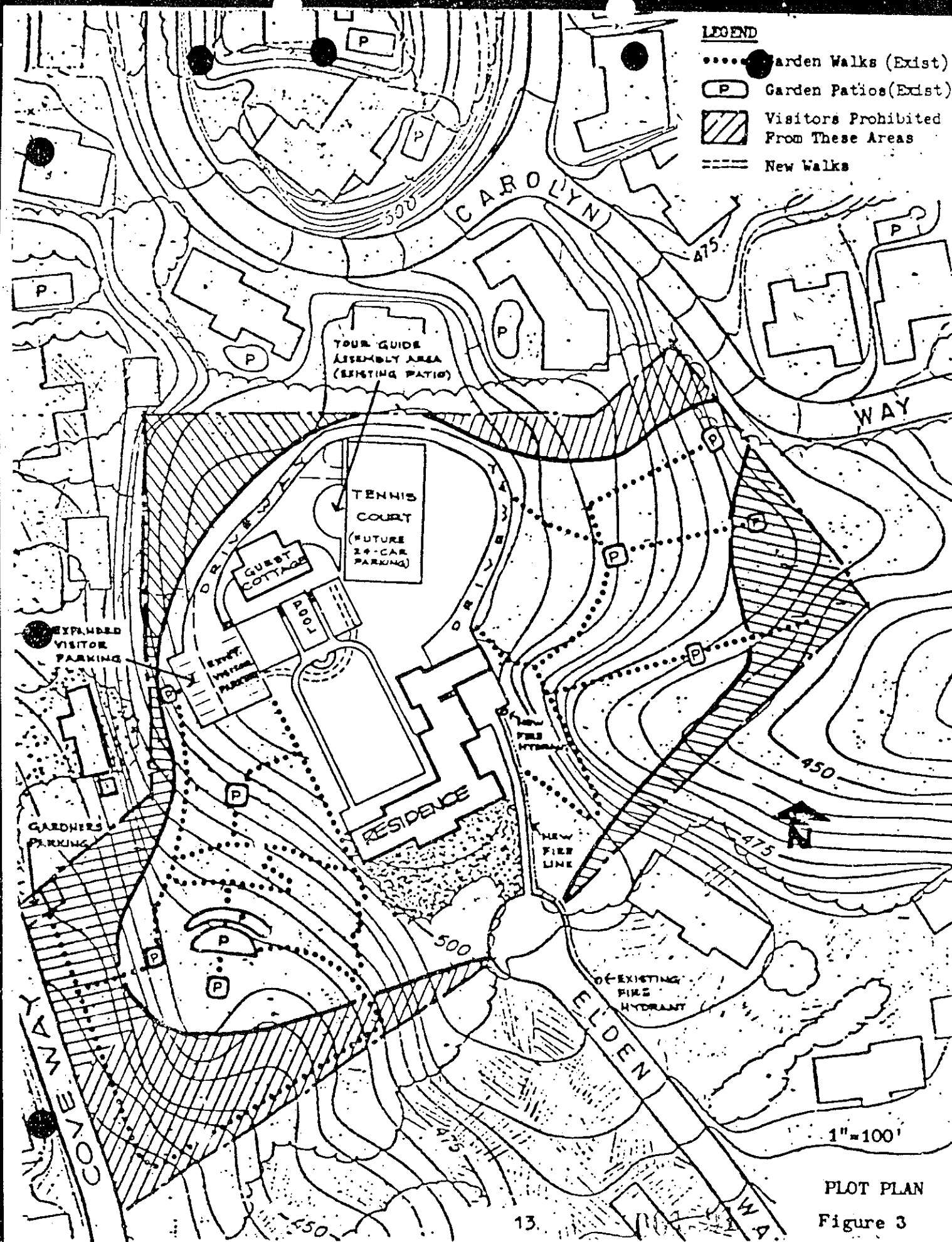
Very truly yours,

  
STEPHEN J. KOONCE  
County Engineer

SJK:mm 22

Attachment

001:90



PLOT PLAN  
Figure 3



STEPHEN J. KOONCE  
COUNTY ENGINEER

RAYMOND W. LOOMIS  
ASSISTANT COUNTY ENGINEER

COUNTY OF LOS ANGELES  
DEPARTMENT OF COUNTY ENGINEER-FACILITIES  
550 SOUTH VERMONT, LOS ANGELES, CA 90020

(213) 738 2011

February 15, 1980



BOARD OF SUPERVISORS

PETER F. SCHABARUM  
KENNETH HAHN  
EDMUND D. EDELMAN  
YVONNE BRATHWAITE BURKE  
BAXTER WARD

Dr. Frank T. Pierce, Jr.  
1034 Cove Way  
Beverly Hills, California 90210

Dear Dr. Pierce:

DRAFT ENVIRONMENTAL IMPACT REPORT  
THE VIRGINIA ROBINSON GARDENS


Your letter dated July 13, 1978, contained specific comments regarding your review of the aforementioned project. Your comments and our response to those comments are as follows:

"... Several large eucalyptus remain and I request that they be removed or topped. Should a large eucalyptus fall on the remaining retaining wall, I fear the wall would go. Earthquakes and rainstorms do occur and on the hillside there is only one target for a falling tree, viz, our house and garden.

"... There are a number of hugh eucalyptus trees in the Robinson Gardens on the hillside in back of our property. Should these fall, they would demolish our house and possibly knock down the remaining part of the retaining wall at the back of the Robinson Gardens. . ."

According to Mr. Roy Ito, Department of Arboreta and Botanic Gardens, more than thirty trees, including several on the hillside in back of your property, have been removed from the Robinson Estate to reduce the danger to adjacent properties.

Very truly yours,

*for*   
STEPHEN J. KOONCE  
County Engineer

SJK:mm 22

001 93

112 \_\_\_\_\_ j

17 22 יד

RPT\_\_\_\_\_REP REP

001: 92

[illegible]

July 24, 1978

*[Handwritten signature]*

Jul 21 1 07 PM '78

CWJ \_\_\_\_\_ DYH \_\_\_\_\_ ZAP \_\_\_\_\_  
 REF TO \_\_\_\_\_  
 HPT \_\_\_\_\_ PREP REPLY \_\_\_\_\_

RECEIVED

JUL 25 1978

A/E SERVICES  
Department of  
County Engineer-Facilities

Re: Draft Environmental Impact Report  
Virginia Robinson Gardens  
J.O. No. 1013.31

Mr. Stephen J. Koonce  
County Engineer  
County of Los Angeles  
Department of County Engineer-Facilities  
550 S. Vermont Avenue  
Los Angeles, Ca. 90020

Dear Mr. Koonce:

We are directly affected by the above proposal since our home adjoins the Robinson Estate on the southwest.

Basically we have no objection to the proposed use of this property. We would hope, however, that the use to which it is finally put by the County follows the idea of reduced scope as indicated on Page 32 of the report.

[illegible]

We are quite concerned about the statement in the last para-  
Page 29 of the above mentioned report wherein you state:

The following measures are not included in the development and operation plans for the Robinson Gardens but could reasonably be expected to reduce adverse impacts.

1. Where neighboring uses are extremely close to the property line, the existing chain link fences surrounding the Robinson property could be replaced with solid fences or vegetation. In one particular case, a swimming pool located in the backyard of a single family residence adjacent to the Robinson property is very visible from one of the brick pathways traversing the estate. Construction of solid fences in areas like this could help mitigate privacy loss experienced by neighbors as a result of the proposed project."

001: 94

Page 2  
July 20, 1978

It would be mandatory to make some satisfactory arrangement with us relative to some sort of fence or screen if the County will be developing this site for some form of public use. Otherwise, we would not have any privacy whatever. It seems to me this fact should have been included in your development and operation plans for the Robinson Gardens.

I would be interested in hearing from you. 1

Very truly yours,

  
Sam Berkman

SB:db

cc: Supervisor Edmund D. Edelman  
Board of Supervisors  
Hall of Administration  
500 W. Temple  
Room 821  
Los Angeles, Ca. 90012

Mr. Roy Ito  
Department of Arboreta  
and Botanic Gardens  
301 N. Baldwin Avenue  
Arcadia, Ca. 91006

003-95



STEPHEN J. KOONCE  
COUNTY ENGINEER

RAYMOND W. LOOMIS  
Assistant County Engineer

COUNTY OF LOS ANGELES  
DEPARTMENT OF COUNTY ENGINEER-FACILITIES  
550 SOUTH VERMONT, LOS ANGELES, CA 90020

(213) 739-2011

February 15, 1980



BOARD OF SUPERVISORS

PETER F. SCHABARUM  
KENNETH HAHN  
EDMUND D. EDELMAN  
YVONNE BRATHWAITE BURKE  
BAXTER WARD

Mr. Sam Berkman  
1024 Cove Way  
Beverly Hills, California 90210

Dear Mr. Berkman:

DRAFT ENVIRONMENTAL IMPACT REPORT  
THE VIRGINIA ROBINSON GARDENS

Your letter dated July 24, 1978, contained specific comments regarding your review of the aforementioned project. Your comments and our response to these comments are as follows:

1. "... Basically we have no objection to the proposed use of this property. We would hope, however, that the use to which it is finally put by the County follows the idea of reduced scope as indicated on Page 32 of the report."

Although, as mentioned on Page 33 of the Draft EIR, the discussed reduction in the number of tour-days still appears unattractive, other modifications have been made to the development and operations proposals for Virginia Robinson Gardens, as follows:

- a. The maximum number of visitor automobiles has been reduced to twenty per tour,
- b. On-site parking will be required for all automobiles except for a maximum of two annual events,
- c. Construction of a visitor's comfort station has been deleted (existing guest cottage facilities will be remodeled),
- d. The driveway will not be widened,
- e. There will be no construction for a tour guide assembly area (existing patios will be utilized),
- f. The only traffic generated on Cove Way will be by the gardeners who will park in the same area used by Mrs. Robinson's staff.

000 9



These modifications have been made to reduce many objectionable aspects to previous proposals for development of Virginia Robinson Gardens. Modifications to help preserve the neighbors' privacy are discussed below.

2. "... It would be mandatory to make some satisfactory arrangement with us relative to some sort of fence or screen if the County will be developing this site for some form of public use. Otherwise, we would not have any privacy whatever. It seems to me this fact should have been included in your development and operation plans for the Robinson Gardens."

The following has been added to Section I, C, Description of Project:

"... To protect the privacy of the neighbors, the following plants have been located as required along the property lines of the Estate:

*Cissus antartica* - Evergreen grape.

*Cupressocyparis leylandii* - Evergreen tree.

*Prunus caroliniana* - Evergreen shrub.

*Myoporum laetum* - Evergreen shrub.

"Also, public tours will be prohibited from portions of the Estate to protect the privacy of the neighbors (Figure 3). This will be controlled by the Arboretum's tour guides who will be with visitors at all times."

Section III, C, Mitigation Measures Proposed to Minimize Significant Effects, fifth paragraph, has been revised to read as follows:

"Where neighboring uses are extremely close to the property lines, plants have been located to grow on existing fences to help protect the privacy of the neighbors; also, in areas where neighbors' privacy may be impaired, tour groups will be prohibited (see Figure 3). Garden tours can be rerouted or prohibited from other areas in the future if they prove to interfere with neighbors' privacy."

Mr. Sam Berkman

-3-

February 15, 1980

"Interference with the neighbors' privacy will also be mitigated by the requirement that a tour guide be with guests at all times on tours of the Estate; guest will not be allowed to tour the grounds unescorted."

A copy of revised Figure 3 is attached.

Very truly yours,

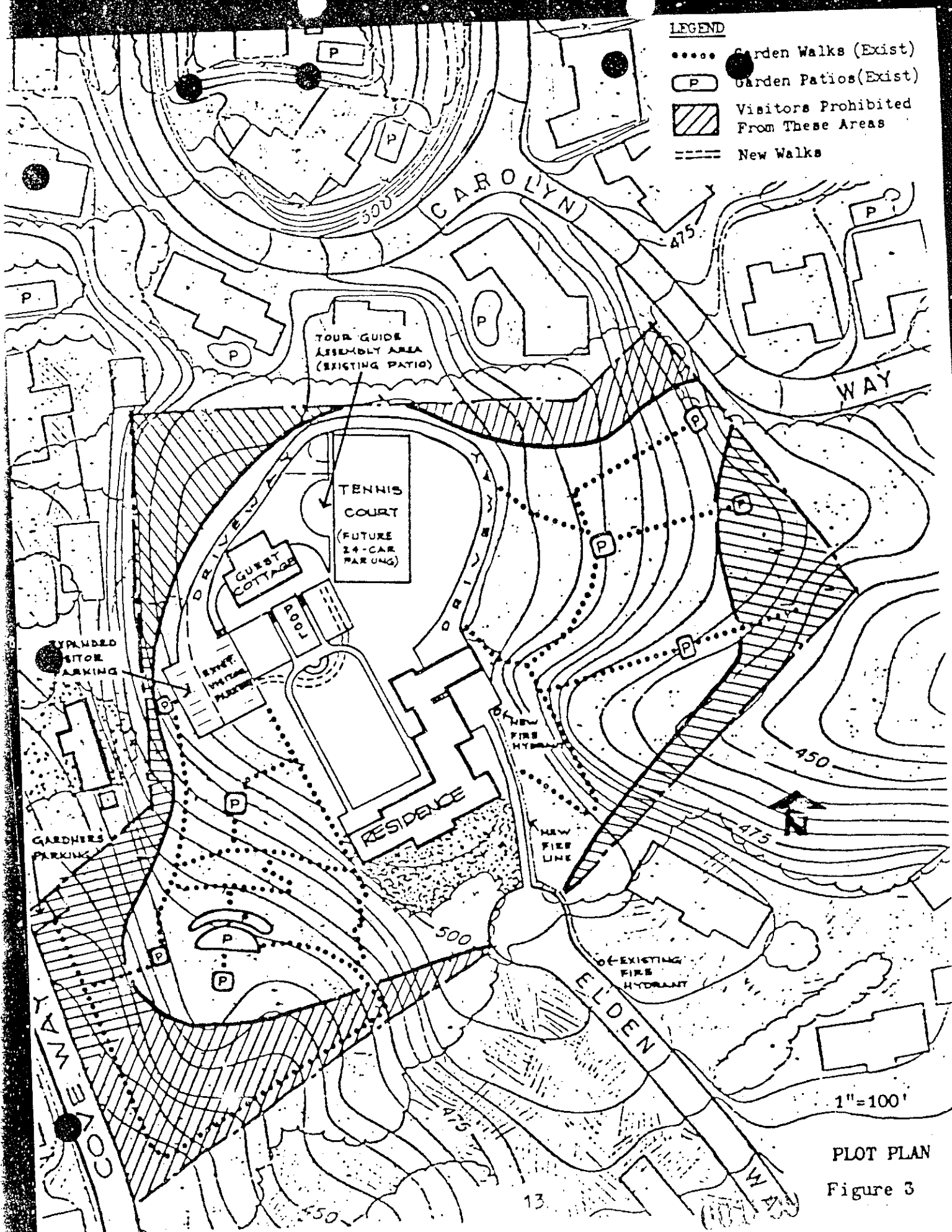


STEPHEN J. KOONCE  
County Engineer

SJK:mm 22

Attachment

001: 98



LEGEND

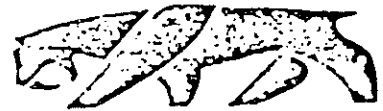
- ..... Garden Walks (Exist)
- P Garden Patios (Exist)
- ▨ Visitors Prohibited From These Areas
- New Walks

PLOT PLAN

Figure 3

[illegible]

AUG 4 1978



August 1, 1978

RECEIVED

AUG 7 1978

A/E SERVICES  
Department of  
County Engineer-Facilities

Mr. Stephen J. Koonce  
County Engineer  
Department of County Engineer-Facilities  
550 South Vermont Avenue  
Los Angeles, California 90020

Dear Mr. Koonce:

SUBJECT: Draft E.I.R., Virginia Robinson Gardens, Beverly Hills

The Museum staff offer the following comments on this document:

A very brief count of the birds was made and we are sure that many more birds could be seen in the region and certainly many would be expected. We would assume that development of this region could be done to attract large numbers of birds, and that their presence would greatly enhance the park, and thus, the attractiveness of the park for consideration by the planning boards. Certainly a garden properly planted would attract birds and this diversity could only be useful, perhaps especially as birds are good predators on plant pests.

No inventory of invertebrates was conducted. The more conspicuous insects, such as butterflies, should be considered as these are usually associated with gardens and open space, and are expected by the public. The management plan for the Gardens should include a provision for the preservation and augmentation of the native insects through:

1. The use of biological control agents and/or integrated pest management, should insect pests be a problem. Pesticides should be avoided if at all possible. Bacillus thuringiensis is not recommended as it would have a negative effect on butterfly populations.

2. Establishment of demonstration butterfly gardens, and the encouragement of larval foodplants and butterfly nectar sources wherever possible in the Gardens.

No list of expected or observed species of amphibians and reptiles is provided. At least one reptile, the southern alligator lizard (Gerrhonotus multicarinatus), would be expected in addition to the amphibians mentioned on p. 15. A complete faunal

Giles W. Mead, Director  
Leon G. Arnold, Assistant Director  
Gurdon Woods, Assistant Director

NATURAL HISTORY MUSEUM LOS ANGELES COUNTY

Los Angeles County Museum of Natural History • 900 Exposition Boulevard • Los Angeles, California 90007 • tel (213) 746-0410  
George C. Page Museum • Hancock Park • 5801 Wilshire Boulevard • Los Angeles, California 90036 • tel (213) 933-7451

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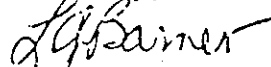
Mr. Stephen J. Koonce  
August 1, 1978  
Page 2

List would strengthen the case for the continuance of the garden, an eventuality which would undoubtedly be beneficial for whatever amphibians and reptiles occur there. The inclusion of ponds in the garden would increase the faunal diversity.

The archaeological section is sufficient.

The residence may not be the first residence in Beverly Hills, although it might very well be the oldest remaining house.

Sincerely,



Lawrence G. Barnes, Curator  
Vertebrate Paleontology Section

and for the Environment Committee

LGB:dc

cc: Dr. Giles Mead, Director  
Mr. Leon Arnold, Assistant Director  
Dr. Ralph Schreiber, Ornithology  
Mr. Julian P. Donahue, Entomology  
Dr. Robert Bezy, Herpetology  
Mr. Tom Sitton, History

000101



STEPHEN J. KOONCE  
COUNTY ENGINEER

RAYMOND W. LOOMIS  
Assistant County Engineer

COUNTY OF LOS ANGELES  
DEPARTMENT OF COUNTY ENGINEER-FACILITIES  
550 SOUTH VERMONT, LOS ANGELES, CA 90020

(213) 738-2011

February 15, 1980



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YVONNE BRATHWAITE BURKE  
BAXTER WARD

Mr. Lawrence G. Barnes, Curator  
Vertebrate Paleontology Section  
Los Angeles County Museum of Natural History  
900 Exposition Boulevard  
Los Angeles, California 90007

Dear Mr. Barnes:

DRAFT ENVIRONMENTAL IMPACT REPORT  
THE VIRGINIA ROBINSON GARDENS

Your letter dated August 1, 1978, contained specific comments regarding your review of the aforementioned project. Your comments and our response to these comments are as follows:

"... No inventory of invertebrates was conducted. The more conspicuous insects, such as butterflies, should be considered as these are usually associated with gardens and open space, and are expected by the public. The management plan for the Gardens should include a provision for the preservation and augmentation of the native insects through:

"1. The use of biological control agents and/or integrated pest management, should insect pest be a problem. Pesticides should be avoided if at all possible. *Bacillus thuringiensis* is not recommended as it would have a negative effect on butterfly populations.

"2. Establishment of demonstration butterfly gardens, and the encouragement of larval foodplants and butterfly nectar sources wherever possible in the Gardens.

"No list of expected or observed species of amphibians and reptiles is provided. At least one reptile, the southern alligator lizard (*Gerrhonotus multicarinatus*), would be expected in addition to the amphibians mentioned on Page 15. A complete faunal list would strengthen the case for the continuance of the garden, an eventuality which would undoubtedly be beneficial for whatever amphibians and reptiles occur there. The inclusion of ponds in the garden would increase the faunal diversity. . ."

003.02

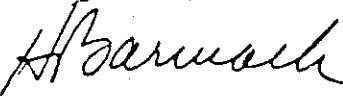
Mr. Lawrence G. Barnes

-2-

February 15, 1980

The present planning by the Department of Arboreta and Botanic Gardens is to preserve and maintain Virginia Robinson Gardens in very much the same state as did Mrs. Robinson, with the addition of plant research, testing and collection programs. The pest management program at Virginia Robinson Gardens will be similar to that used by the Department of Arboreta and Botanic Gardens at other County facilities but with necessary modifications to meet any special conditions of this site. The Department of Arboreta and Botanic Gardens has indicated that efforts at Virginia Robinson Gardens are to be concentrated on the abovementioned programs, which are within their expertise, and it is not practical at this time to undertake programs such as butterfly gardens and expansion of faunal diversity within the Gardens. As the gardens are to be preserved and maintained in their present condition, any existing invertebrates, amphibians, reptiles and fauna are not expected to be disturbed by the operations of the Gardens and therefore, a listing of these beyond that included in the Draft EIR is not needed at this time.

Very truly yours,

*for*   
STEPHEN J. KOONCE  
County Engineer

SJK:mm 22

001.183

Rec'd 8/20/78

August 22, 1978

DESIGN & CONSTRUCTION BRANCH		Archie	Info
BARNACK	11/1		
Architect-Engineer		X	
Contracts Admin.			
Project Management			
Env. Dev.			
File			

Dear Mr. Koonce:

1. The comments concerning the Draft submitted by the other neighbors adjoining the Robinson Estate and the City of Beverly Hills reflect matters of similar concern to persons residing on Cove Way.

3. The Draft fails to analyse the visual or noise impact on the residents of Cove Way as a result of the proposed use or as a result of the peculiar topography of the Robinson Estate.

5. The Draft indicates that an employee parking lot would be located on Cove Way. No reference is made to the size of the parking lot, whether the area designated can adequately serve as a parking lot, if cars can park on the street, what the traffic impact on Cove Way will be from the employees using the parking lot and what the noise and visual impact will be from the parking of cars. No analysis is made in the Draft to determine if a wall or landscaping in front of the proposed parking lot would lessen the visual and noise impact resulting from employee parking at said site, or whether another site on the Estate would be more appropriate.

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Mr. Stephen J. Koonce  
August 22, 1978  
Page Two

6. Any public use of the Robinson Estate would have an adverse noise and visual effect on the residents of Cove Way as well as adversely affecting their privacy because of the topography. Persons on the Estate could look into the neighbors' houses and yards and persons could stop on the street and look up at the Estate.

7. No analysis is made in the Draft to determine if a wall or landscaping either at ground level and/or at the crest of the hill would lessen the visual and noise impact resulting from the proposed use of the Estate.

Very truly yours,

*Norman & Sadie Lee*  
1025 Cove Way Beverly Hills

*Melvin Hirsch*  
MELVIN HIRSH  
1031 COVE WAY

*E. C. Rigby*  
E. C. RIGBY  
1021 Cove Way

*Jerry Lushning*  
JERRY LUSHNING  
1002 HARTFORD WAY (CORNER COVE)

*Dick Martin*  
DICK MARTIN  
1032 COVE WAY

*Sam Beberman*  
SAM BEREMAN 1024 Cove Way  
*Rodolph & Berberman*  
RODOLPH & BERBERMAN

*Mr. & Mrs. David Comsky*  
DAVID COMSKY  
1027 COVE WAY

cc: Supervisor Edmund D. Edelman  
Supervisor Peter Schabarum

001-95



STEPHEN J. KOONCE  
COUNTY ENGINEER

RAYMOND W. LOOMIS  
Assistant County Engineer

COUNTY OF LOS ANGELES  
DEPARTMENT OF COUNTY ENGINEER-FACILITIES  
550 SOUTH VERMONT, LOS ANGELES, CA 90020

(213) 738-2011

February 15, 1980



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BAXTER WARD

Mr. Melvin Hirsh  
1031 Cove Way  
Beverly Hills, California 90210

Dear Mr. Hirsh:

DRAFT ENVIRONMENTAL IMPACT REPORT  
THE VIRGINIA ROBINSON ESTATE

Your letter dated August 22, 1978, contained specific comments regarding your review of the aforementioned project. Your comments and our response to those comments are as follows:

1. "... The Draft fails to analyze the visual or noise impact on the residents of Cove Way as a result of the proposed use or as a result of the peculiar topography of the Robinson Estate.

"... Any public use of the Robinson Estate would have an adverse noise and visual effect on the residents of Cove Way as well as adversely affecting their privacy because of the topography. Persons on the Estate could look into the neighbors' houses and yards and persons could stop on the street and look up at the Estate.

"... No analysis is made in the Draft to determine if a wall or landscaping either at ground level and/or at the crest of the hill would lessen the visual and noise impact resulting from the proposed use of the Estate."

The following has been added to Section I, C, Description of Project, of the EIR:

"To protect the privacy of the neighbors, the following plants have been located as required along the property lines of the Estate:

Cissus antartica - Evergreen grape.

Cupressocyparis leylandii - Evergreen tree.

Prunus caroliniana - Evergreen shrub.

Myoporum laetum - Evergreen shrub.

000195

"Also, public tours will be prohibited from portions of the Estate to protect the privacy of the neighbors (Figure 3). This will be controlled by the Arboretum's tour guides who will be with visitors at all times."

The following has been added to Section III, A, 5, Noise, of the EIR:

"The Department of Health Services, on September 5, 1979, conducted a noise survey on the Robinson Estate across the street from 1027 Cove Way and also in front of 1017 Crescent Drive at the intersection of Elden Way. This data is located in Appendix Two.

"The Cove Way monitoring location was on an upper garden walkway, generally east of the gardeners' parking area, facing Cove Way. Noise levels were monitored between 11:00 a.m. and 12:00 noon, a period which is considered to be of sufficient time for results to be statistically valid.

"Major noise sources from Cove Way were approximately fifty automobiles and trucks which passed during the monitoring period. In addition, ambient noise levels were influenced by gardeners operating power equipment on adjacent property.

"The ambient noise levels recorded on Cove Way indicate that the area has a noise quality which is excellent for an urban residential environment (An  $L_{eq}$  of 50.2 dB with a median noise level ( $L_{50}$ ) of 43 dB).

"In assessing the impact of the proposed project on ambient noise levels, one must consider the change in the distribution curve of ambient noise levels caused by noise intrusions. In the case of the Robinson Gardens, the noise impact is evaluated according to the degree of shift in the ambient noise distribution curve caused by the project activities. The degree of change in the ambient noise distribution curve must significantly exceed the amount of expected daily noise fluctuations for negative noise impact from a proposed project to occur.

"A review of the noise monitoring data for Cove way and Elden Way indicates that increased traffic on these streets which is related to the subject project will not significantly change the ambient noise distribution curve. There are several reasons for this conclusion:

- a. The number of employees on the Estate will be less than employed by Mrs. Robinson. This will reduce the number of vehicle trips and associated noise of employees' automobiles.

- b. With the exception of the daily tours, seminars and other events related to the subject project will occur with less frequency than social affairs hosted by Mrs. Robinson.
- c. Traffic noise attributed to the tours will occur Tuesday through Saturday during four approximately one-half hour periods--9:30-10:00 a.m. and 1:30-2:00 p.m. when visitors are arriving for the tours, and 12:00-12:30 p.m. and 4:00-4:30 p.m. when visitors are departing after the tours.
- d. The increased traffic for the maximum one-per-month special evening events will be over a short period of time as guest will arrive and depart at approximately the same time; these functions will not significantly change the ambient noise distribution curve; and all parking for these events will be on the Estate.

"Noise impacts generated within the Estate are not expected to be any greater than in the past for the following reasons: .....

- a. The number of gardeners working and operating power equipment has been reduced.
- b. The tours will be conducted without the use of amplification equipment by one tour guide.
- c. With visitors prohibited from a large portion of the Estate's perimeter (see Figure 3), the distance between the tour groups and neighbors will help attenuate sound from the Estate.
- d. The irregular topography and vegetation are natural noise damping characteristics of the site."
- e. The future tennis court parking will be used only one day per month and the existing north wall of the court will help attenuate automobile sounds.

A masonry wall with a minimum density of at least 5 lbs/ft and approximately 6 feet in height can effectively reduce parking lot noise; however, due to the low activity level expected in the parking lot and the fact that the dominant noise source is traffic on Cove Way, the wall would be of little use in reducing community noise levels. Landscaping would not reduce the noise from the parking lot. Due to the fewer number of gardeners' automobiles parked in the Cove Way lot than during Mrs. Robinson's residence, the noise and visual impact will be reduced.

Section III, C, Mitigation Measures Proposed to Minimize Significant Effects, fifth paragraph, has been revised to read as follows:

"Where neighboring uses are extremely close to the property lines, plants have been located to grow on existing fences to help protect the privacy of the neighbors; also, in areas where neighbors' privacy may be impaired, tour groups will be prohibited (see Figure 3). Garden tours can be rerouted or prohibited from other areas in the future if they prove to interfere with neighbors' privacy.

"Interference with the neighbors' privacy will also be mitigated by the requirement that a tour guide be with guests at all times on tours of the Estate; guest will not be allowed to tour the grounds unescorted."

2. "... No analysis is made in the Draft of the impact on residents of Cove Way of increased traffic congestion and traffic hazards resulting not only from employee parking but also from other persons and tourists attempting to view the Estate from Cove Way.

"... The Draft indicates that an employee parking lot would be located on Cove Way. No reference is made to the size of the parking lot, whether the area designated can adequately serve as a parking lot, if cars can park on the street, what the traffic impact on Cove Way will be from the employees using the parking lot and what the noise and visual impact will be from the parking of cars. No analysis is made in the Draft to determine if a wall or landscaping in front of the proposed parking lot would lessen the visual and noise impact resulting from employee parking at said site, or whether another site on the Estate would be more appropriate."

The following has been added to Section I, C, Description of Project, of the EIR:

"Employees

"The nine employees on the Estate will consist of a caretaker, a part-time custodian, a tour guide and six gardeners; the caretaker will live on the property. The caretaker, custodian (10:00 a.m. to 4:00 p.m.) and tour guide (9:30 a.m. to 4:00 p.m.) will park in the garage of the residence; the gardeners (7:30 a.m. to 3:30 p.m.) will park off Cove Way in the garage and lot used by Mrs. Robinson's gardening staff. There may occasionally be part-time volunteers assisting in tours of the Estate."

Mr. Melvin Hirsh

-5-


February 15, 1980

The following has been added to Section III, A, 3, Circulation, of the EIR:

"Traffic flow on Cove Way will include a maximum of twelve vehicle trips per day due to the six gardeners who will park in the lot off Cove Way (Figure 3). This same lot was used by Mrs. Robinson's gardeners, who numbered 8-9; therefore, the number of vehicle trips on Cove Way should not be increased above that during Mrs. Robinson's residence."

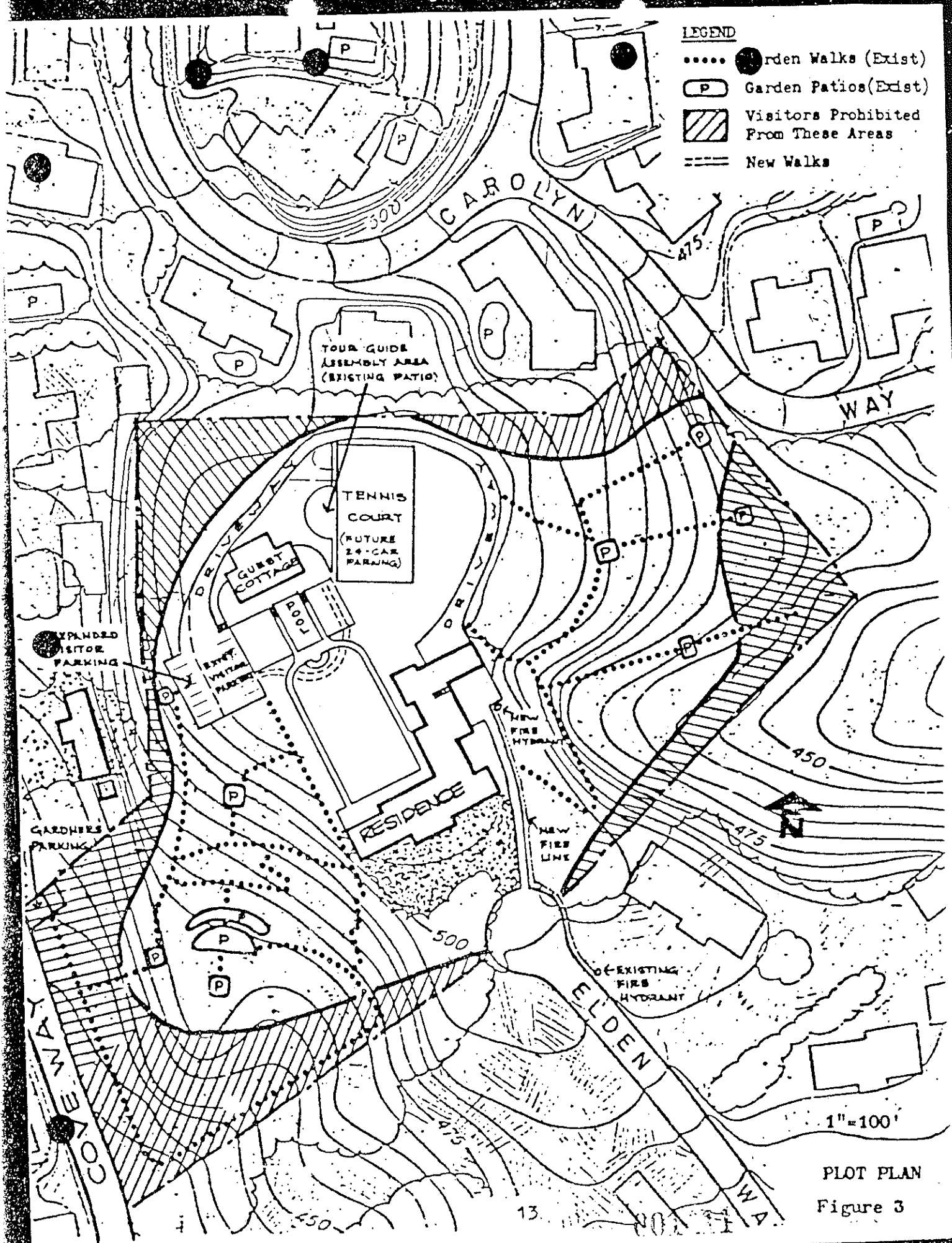
The garages and adjacent exterior parking area provide adequate space for the gardeners' automobiles to be parked off-street. The visual and noise impact due to the use of Cove Way by the gardeners should be little different from that in previous years. Other parking sites on the Estate will be utilized by visitors and other employees.

Very truly yours,

*for*   
STEPHEN J. KOONCE  
County Engineer

SJK:mm 22

Attachment



PLOT PLAN  
Figure 3



STEPHEN J. KOONCE  
COUNTY ENGINEER

RAYMOND W. LOOMIS  
Assistant County Engineer

COUNTY OF LOS ANGELES  
DEPARTMENT OF COUNTY ENGINEER-FACILITIES  
550 SOUTH VERMONT, LOS ANGELES, CA 90020

(213) 738-2011

February 15, 1980



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EDMUND D. EDELMAN  
YVONNE BRATHWAITE BURKE  
BAXTER WARD

Dr. & Mrs. E. C. Rigby  
1021 Cove Way  
Beverly Hills, California 90210

Dear Dr. & Mrs. Rigby:

DRAFT ENVIRONMENTAL IMPACT REPORT  
THE VIRGINIA ROBINSON ESTATE

Your letter dated August 22, 1978, contained specific comments regarding your review of the aforementioned project. Your comments and our response to those comments are as follows:

1. "... The Draft fails to analyze the visual or noise impact on the residents of Cove Way as a result of the proposed use or as a result of the peculiar topography of the Robinson Estate.

"... Any public use of the Robinson Estate would have an adverse noise and visual effect on the residents of Cove Way as well as adversely affecting their privacy because of the topography. Persons on the Estate could look into the neighbors' houses and yards and persons could stop on the street and look up at the Estate.

"... No analysis is made in the Draft to determine if a wall or landscaping either at ground level and/or at the crest of the hill would lessen the visual and noise impact resulting from the proposed use of the Estate."

The following has been added to Section I, C, Description of Project, of the EIR:

"To protect the privacy of the neighbors, the following plants have been located as required along the property lines of the Estate:

Cissus antartica - Evergreen grape.

Cupressocyparis leylandii - Evergreen tree.

Prunus caroliniana - Evergreen shrub.

Myoporum laetum - Evergreen shrub.

001/12



"Also, public tours will be prohibited from portions of the Estate to protect the privacy of the neighbors (Figure 3). This will be controlled by the Arboretum's tour guides who will be with visitors at all times."

The following has been added to Section III, A,5, Noise, of the EIR:

"The Department of Health Services, on September 5, 1979, conducted a noise survey on the Robinson Estate across the street from 1027 Cove Way and also in front of 1017 Crescent Drive at the intersection of Elden Way. This data is located in Appendix Two.

"The Cove Way monitoring location was on an upper garden walkway, generally east of the gardeners' parking area, facing Cove Way. Noise levels were monitored between 11:00 a.m. and 12:00 noon, a period which is considered to be of sufficient time for results to be statistically valid.

"Major noise sources from Cove Way were approximately fifty automobiles and trucks which passed during the monitoring period. In addition, ambient noise levels were influenced by gardeners operating power equipment on adjacent property.

"The ambient noise levels recorded on Cove Way indicate that the area has a noise quality which is excellent for an urban residential environment (An  $L_{eq}$  of 50.2 dB with a median noise level ( $L_{50}$ ) of 43 dB).

"In assessing the impact of the proposed project on ambient noise levels, one must consider the change in the distribution curve of ambient noise levels caused by noise intrusions. In the case of the Robinson Gardens, the noise impact is evaluated according to the degree of shift in the ambient noise distribution curve caused by the project activities. The degree of change in the ambient noise distribution curve must significantly exceed the amount of expected daily noise fluctuations for negative noise impact from a proposed project to occur.

"A review of the noise monitoring data for Cove way and Elden Way indicates that increased traffic on these streets which is related to the subject project will not significantly change the ambient noise distribution curve. There are several reasons for this conclusion:

- a. The number of employees on the Estate will be less than employed by Mrs. Robinson. This will reduce the number of vehicle trips and associated noise of employees' automobiles.

- b. With the exception of the daily tours, seminars and other events related to the subject project will occur with less frequency than social affairs hosted by Mrs. Robinson.
- c. Traffic noise attributed to the tours will occur Tuesday through Saturday during four approximately one-half hour periods--9:30-10:00 a.m. and 1:30-2:00 p.m. when visitors are arriving for the tours, and 12:00-12:30 p.m. and 4:00-4:30 p.m. when visitors are departing after the tours.
- d. The increased traffic for the maximum one-per-month special evening events will be over a short period of time as guest will arrive and depart at approximately the same time; these functions will not significantly change the ambient noise distribution curve; and all parking for these events will be on the Estate.

"Noise impacts generated within the Estate are not expected to be any greater than in the past for the following reasons:

- a. The number of gardeners working and operating power equipment has been reduced.
- b. The tours will be conducted without the use of amplification equipment by one tour guide.
- c. With visitors prohibited from a large portion of the Estate's perimeter (see Figure 3), the distance between the tour groups and neighbors will help attenuate sound from the Estate.
- d. The irregular topography and vegetation are natural noise damping characteristics of the site."
- e. The future tennis court parking will be used only one day per month and the existing north wall of the court will help attenuate automobile sounds.

A masonry wall with a minimum density of at least 5 lbs/ft and approximately 6 feet in height can effectively reduce parking lot noise; however, due to the low activity level expected in the parking lot and the fact that the dominant noise source is traffic on Cove Way, the wall would be of little use in reducing community noise levels. Landscaping would not reduce the noise from the parking lot. Due to the fewer number of gardeners' automobiles parked in the Cove Way lot than during Mrs. Robinson's residence, the noise and visual impact will be reduced.

Section III, C, Mitigation Measures Proposed to Minimize Significant Effects, fifth paragraph, has been revised to read as follows:

1. "Where neighboring uses are extremely close to the property lines, plants have been located to grow on existing fences to help protect the privacy of the neighbors; also, in areas where neighbors' privacy may be impaired, tour groups will be prohibited (see Figure 3). Garden tours can be rerouted or prohibited from other areas in the future if they prove to interfere with neighbors' privacy.
2. "Interference with the neighbors' privacy will also be mitigated by the requirement that a tour guide be with guests at all times on tours of the Estate; guest will not be allowed to tour the grounds unescorted."
2. ". . . No analysis is made in the Draft of the impact on residents of Cove Way of increased traffic congestion and traffic hazards resulting not only from employee parking but also from other persons and tourists attempting to view the Estate from Cove Way.
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February 15, 1980

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The garages and adjacent exterior parking area provide adequate space for the gardeners' automobiles to be parked off-street. The visual and noise impact due to the use of Cove Way by the gardeners should be little different from that in previous years. Other parking sites on the Estate will be utilized by visitors and other employees.

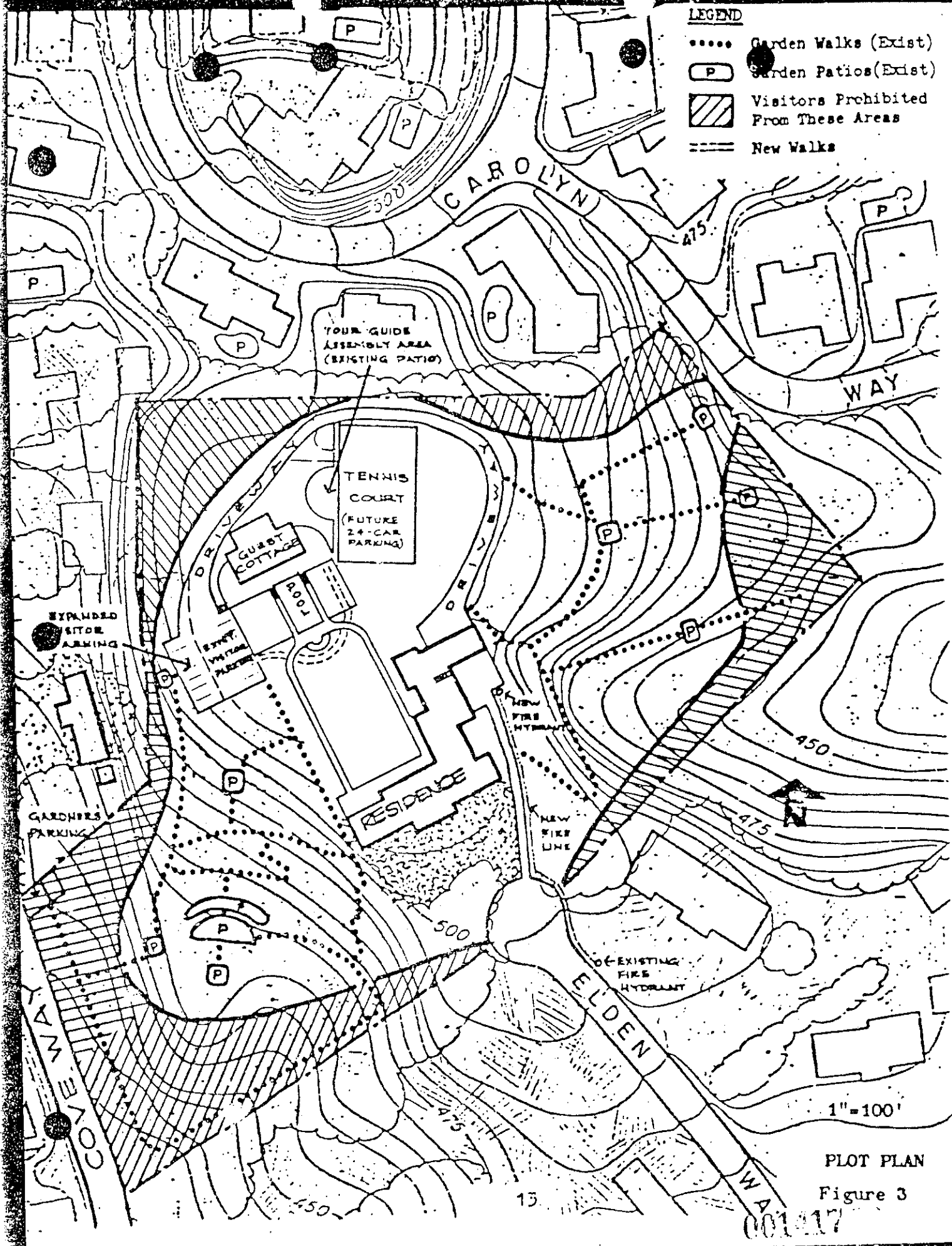
Very truly yours,

*for*   
STEPHEN J. KOONCE  
County Engineer

SJK:mm 22

Attachment

001416





STEPHEN J. KOONCE  
County Engineer

RAYMOND W. LOOMIS  
Assistant County Engineer

COUNTY OF LOS ANGELES  
DEPARTMENT OF COUNTY ENGINEER-FACILITIES  
550 SOUTH VERMONT, LOS ANGELES, CA 90020

(213) 738 2011

February 15, 1980



BOARD OF SUPERVISORS

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EDMUND D. EDELMAN  
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BAXTER WARD

Mr. Jerry Lushing  
1002 Hartford Way  
Beverly Hills, California 90210

Dear Mr. Lushing:

DRAFT ENVIRONMENTAL IMPACT REPORT  
THE VIRGINIA ROBINSON ESTATE

Your letter dated August 22, 1978, contained specific comments regarding your review of the aforementioned project. Your comments and our response to those comments are as follows:

1. "... The Draft fails to analyze the visual or noise impact on the residents of Cove Way as a result of the proposed use or as a result of the peculiar topography of the Robinson Estate.

"... Any public use of the Robinson Estate would have an adverse noise and visual effect on the residents of Cove Way as well as adversely affecting their privacy because of the topography. Persons on the Estate could look into the neighbors' houses and yards and persons could stop on the street and look up at the Estate.

"... No analysis is made in the Draft to determine if a wall or landscaping either at ground level and/or at the crest of the hill would lessen the visual and noise impact resulting from the proposed use of the Estate."

The following has been added to Section I, C, Description of Project, of the EIR:

"To protect the privacy of the neighbors, the following plants have been located as required along the property lines of the Estate:

Cissus antartica - Evergreen grape.

Cupressocyparis leylandii - Evergreen tree.

Prunus caroliniana - Evergreen shrub.

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001-18

"Also, public tours will be prohibited from portions of the Estate to protect the privacy of the neighbors (Figure 3). This will be controlled by the Arboretum's tour guides who will be with visitors at all times."

The following has been added to Section III, A,5, Noise, of the EIR:

"The Department of Health Services, on September 5, 1979, conducted a noise survey on the Robinson Estate across the street from 1027 Cove Way and also in front of 1017 Crescent Drive at the intersection of Elden Way. This data is located in Appendix Two.

"The Cove Way monitoring location was on an upper garden walkway, generally east of the gardeners' parking area, facing Cove Way. Noise levels were monitored between 11:00 a.m. and 12:00 noon, a period which is considered to be of sufficient time for results to be statistically valid.

"Major noise sources from Cove Way were approximately fifty automobiles and trucks which passed during the monitoring period. In addition, ambient noise levels were influenced by gardeners operating power equipment on adjacent property.

"The ambient noise levels recorded on Cove Way indicate that the area has a noise quality which is excellent for an urban residential environment (An  $L_{eq}$  of 50.2 dB with a median noise level ( $L_{50}$ ) of 43 dB).

"In assessing the impact of the proposed project on ambient noise levels, one must consider the change in the distribution curve of ambient noise levels caused by noise intrusions. In the case of the Robinson Gardens, the noise impact is evaluated according to the degree of shift in the ambient noise distribution curve caused by the project activities. The degree of change in the ambient noise distribution curve must significantly exceed the amount of expected daily noise fluctuations for negative noise impact from a proposed project to occur.

"A review of the noise monitoring data for Cove way and Elden Way indicates that increased traffic on these streets which is related to the subject project will not significantly change the ambient noise distribution curve. There are several reasons for this conclusion:

- a. The number of employees on the Estate will be less than employed by Mrs. Robinson. This will reduce the number of vehicle trips and associated noise of employees' automobiles.

- b. With the exception of the daily tours, seminars and other events related to the subject project will occur with less frequency than social affairs hosted by Mrs. Robinson.
- c. Traffic noise attributed to the tours will occur Tuesday through Saturday during four approximately one-half hour periods--9:30-10:00 a.m. and 1:30-2:00 p.m. when visitors are arriving for the tours, and 12:00-12:30 p.m. and 4:00-4:30 p.m. when visitors are departing after the tours.
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"Noise impacts generated within the Estate are not expected to be any greater than in the past for the following reasons:

- a. The number of gardeners working and operating power equipment has been reduced.
- b. The tours will be conducted without the use of amplification equipment by one tour guide.
- c. With visitors prohibited from a large portion of the Estate's perimeter (see Figure 3), the distance between the tour groups and neighbors will help attenuate sound from the Estate.
- d. The irregular topography and vegetation are natural noise damping characteristics of the site."
- e. The future tennis court parking will be used only one day per month and the existing north wall of the court will help attenuate automobile sounds.

A masonry wall with a minimum density of at least 5 lbs/ft and approximately 6 feet in height can effectively reduce parking lot noise; however, due to the low activity level expected in the parking lot and the fact that the dominant noise source is traffic on Cove Way, the wall would be of little use in reducing community noise levels. Landscaping would not reduce the noise from the parking lot. Due to the fewer number of gardeners' automobiles parked in the Cove Way lot than during Mrs. Robinson's residence, the noise and visual impact will be reduced.



Section III, C, Mitigation Measures Proposed to Minimize Significant Effects, fifth paragraph, has been revised to read as follows:

"Where neighboring uses are extremely close to the property lines, plants have been located to grow on existing fences to help protect the privacy of the neighbors; also, in areas where neighbors' privacy may be impaired, tour groups will be prohibited (see Figure 3). Garden tours can be rerouted or prohibited from other areas in the future if they prove to interfere with neighbors' privacy.

"Interference with the neighbors' privacy will also be mitigated by the requirement that a tour guide be with guests at all times on tours of the Estate; guest will not be allowed to tour the grounds unescorted."

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"... The Draft indicates that an employee parking lot would be located on Cove Way. No reference is made to the size of the parking lot, whether the area designated can adequately serve as a parking lot, if cars can park on the street, what the traffic impact on Cove Way will be from the employees using the parking lot and what the noise and visual impact will be from the parking of cars. No analysis is made in the Draft to determine if a wall or landscaping in front of the proposed parking lot would lessen the visual and noise impact resulting from employee parking at said site, or whether another site on the Estate would be more appropriate."

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Mr. Jerry Lushing

-5-

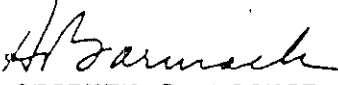
February 15, 1980

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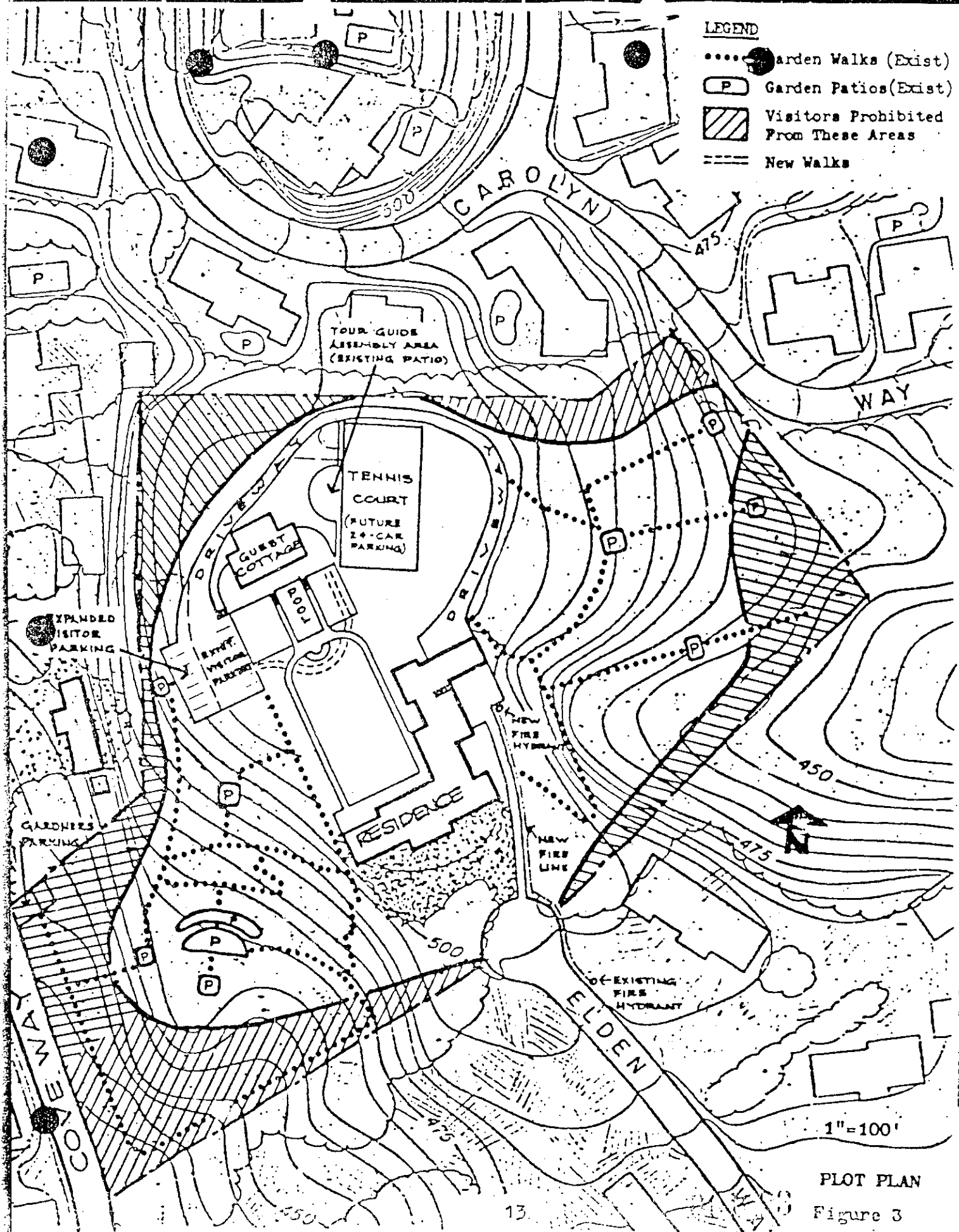
Very truly yours,

*for*   
STEPHEN J. KOONCE  
County Engineer

SJK:mm 22

Attachment

00112



PLOT PLAN  
Figure 3



STEPHEN J. KOONCE  
County Engineer

RAYMOND W. LOOMIS  
Assistant County Engineer

COUNTY OF LOS ANGELES  
DEPARTMENT OF COUNTY ENGINEER-FACILITIES  
550 SOUTH VERMONT, LOS ANGELES, CA 90020

(213) 736-2011



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BAXTER WARD

February 15, 1980

Mr. Dick Martin  
1032 Cove Way  
Beverly Hills, California 90210

Dear Mr. Martin:

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THE VIRGINIA ROBINSON ESTATE

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001424

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A masonry wall with a minimum density of at least 5 lbs/ft and approximately 6 feet in height can effectively reduce parking lot noise; however, due to the low activity level expected in the parking lot and the fact that the dominant noise source is traffic on Cove Way, the wall would be of little use in reducing community noise levels. Landscaping would not reduce the noise from the parking lot. Due to the fewer number of gardeners' automobiles parked in the Cove Way lot than during Mrs. Robinson's residence, the noise and visual impact will be reduced.

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Mr. Dick Martin

-5-

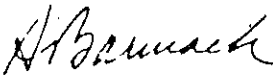
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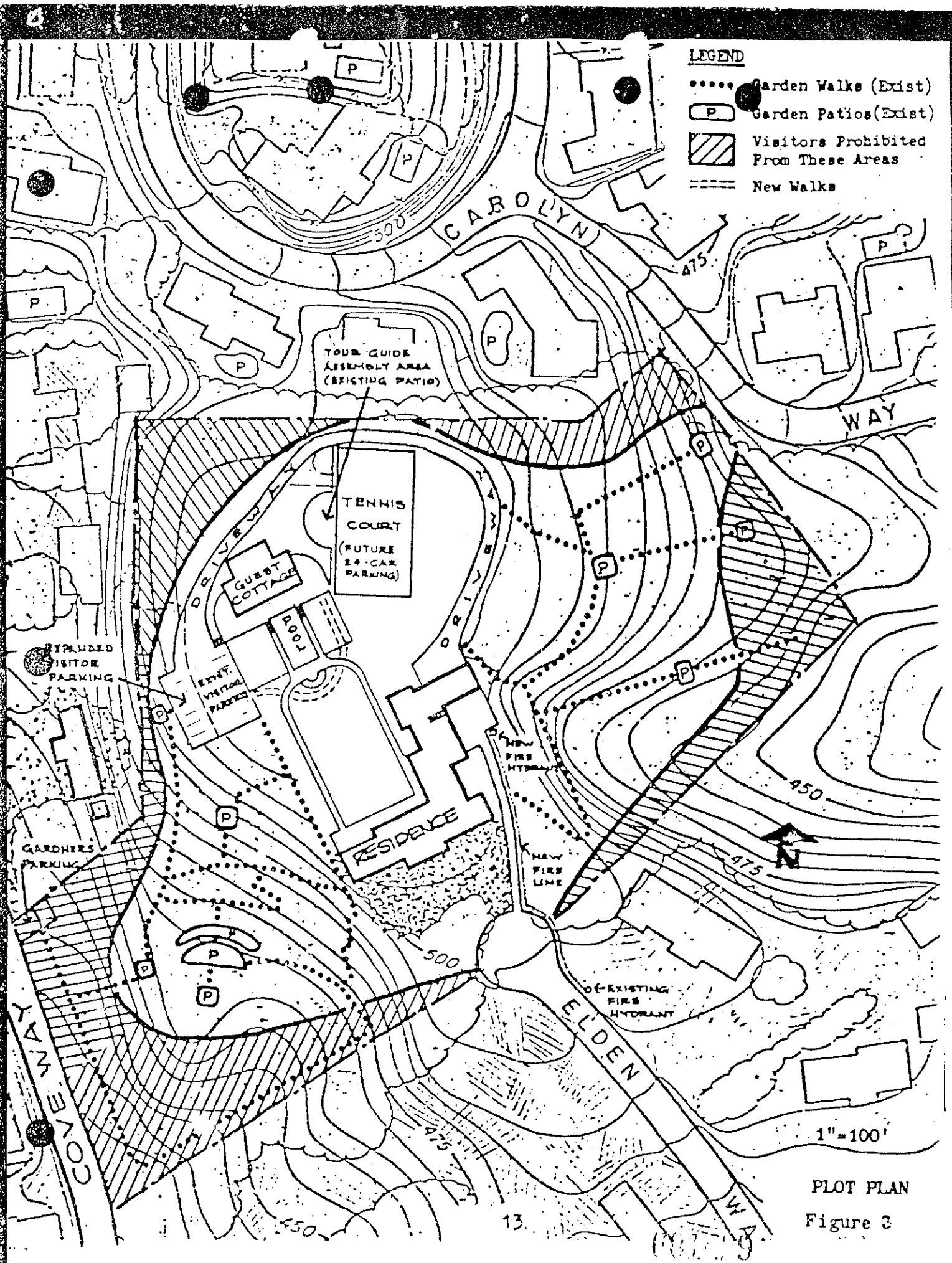
*for*   
STEPHEN J. KOONCE  
County Engineer

SJK:mm 22

Attachment

001:78







STEPHEN J. KOONCE  
County Engineer

COUNTY OF LOS ANGELES  
DEPARTMENT OF COUNTY ENGINEER-FACILITIES  
550 SOUTH VERMONT, LOS ANGELES, CA 90020



BOARD OF SUPERVISORS

RAYMOND W. LOOMIS  
Assistant County Engineer

(213) 738 2011

February 15, 1980

PETER F. SCHABARUM  
KENNETH HAHN  
EDMUND D. EDELMAN  
YVONNE BRATHWAITE BURKE  
BAXTER WARD

Mr. Sam Berkman  
Ms. Roslyn K. Berkman  
1024 Cove Way  
Beverly Hills, California 90210

Dear Mr. & Ms. Berkman:

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THE VIRGINIA ROBINSON ESTATE

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001110

Mr. Sam Berkman  
Ms. Roslyn K. Berkman

-2-

February 15, 1980

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001:51

Mr. Sam Berkman  
Ms. Roslyn K. Berkman

-3-

February 15, 1980

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001132

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Mr. Sam Berkman  
Ms. Roslyn K. Berkman

-5-

February 15, 1980

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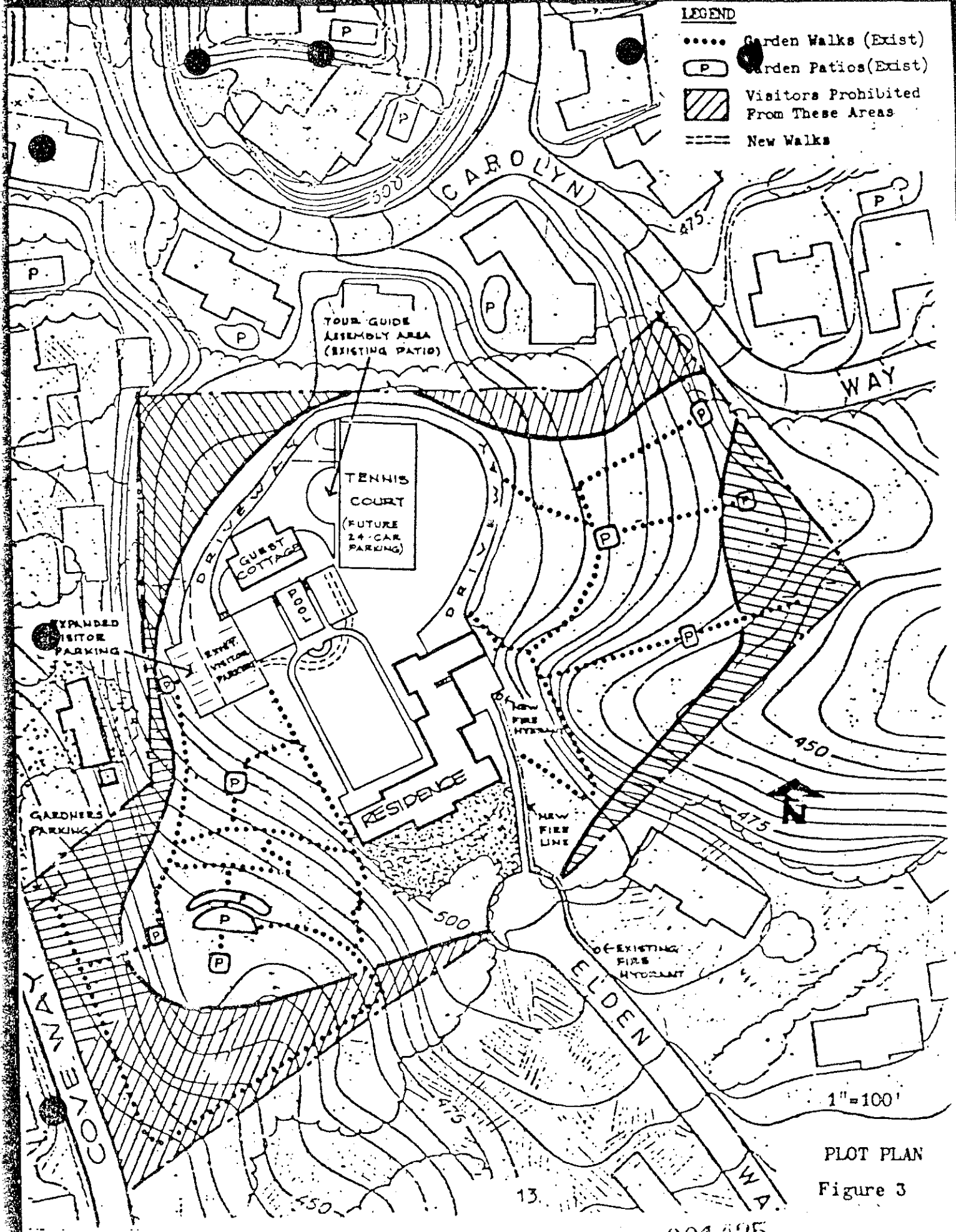
Very truly yours,

*for* *H. Barnack*  
STEPHEN J. KOONCE  
County Engineer

SJK:mm 22

Attachment

001/34



PLOT PLAN  
Figure 3



STEPHEN J. KOONCE  
COUNTY ENGINEER

RAYMOND W. LOOMIS  
ASSISTANT COUNTY ENGINEER

COUNTY OF LOS ANGELES  
DEPARTMENT OF COUNTY ENGINEER-FACILITIES  
550 SOUTH VERMONT, LOS ANGELES, CA 90020

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PETER F. SCHABARUM  
KENNETH HAHN  
EDMUND D. EDELMAN  
VYVONNE BRATHWAITE BURKE  
BAXTER WARD

February 15, 1980

Mr. & Mrs. David Comsky  
1027 Cove Way  
Beverly Hills, California 90210

Dear Mr. & Mrs. Comsky:

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THE VIRGINIA ROBINSON ESTATE

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1. "... The Draft fails to analyze the visual or noise impact on the residents of Cove Way as a result of the proposed use or as a result of the peculiar topography of the Robinson Estate.

"... Any public use of the Robinson Estate would have an adverse noise and visual effect on the residents of Cove Way as well as adversely affecting their privacy because of the topography. Persons on the Estate could look into the neighbors' houses and yards and persons could stop on the street and look up at the Estate.

"... No analysis is made in the Draft to determine if a wall or landscaping either at ground level and/or at the crest of the hill would lessen the visual and noise impact resulting from the proposed use of the Estate."

The following has been added to Section I, C, Description of Project, of the EIR:

"To protect the privacy of the neighbors, the following plants have been located as required along the property lines of the Estate:

Cissus antartica - Evergreen grape.

Cupressocyparis leylandii - Evergreen tree.

Prunus caroliniana - Evergreen shrub.

Myoporum laetum - Evergreen shrub.



"Also, public tours will be prohibited from portions of the Estate to protect the privacy of the neighbors (Figure 3). This will be controlled by the Arboretum's tour guides who will be with visitors at all times."

The following has been added to Section III, A,5, Noise, of the EIR:

"The Department of Health Services, on September 5, 1979, conducted a noise survey on the Robinson Estate across the street from 1027 Cove Way and also in front of 1017 Crescent Drive at the intersection of Elden Way. This data is located in Appendix Two.

"The Cove Way monitoring location was on an upper garden walkway, generally east of the gardeners' parking area, facing Cove Way. Noise levels were monitored between 11:00 a.m. and 12:00 noon, a period which is considered to be of sufficient time for results to be statistically valid.

"Major noise sources from Cove Way were approximately fifty automobiles and trucks which passed during the monitoring period. In addition, ambient noise levels were influenced by gardeners operating power equipment on adjacent property.

"The ambient noise levels recorded on Cove Way indicate that the area has a noise quality which is excellent for an urban residential environment (An  $L_{eq}$  of 50.2 dB with a median noise level ( $L_{50}$ ) of 43 dB).

"In assessing the impact of the proposed project on ambient noise levels, one must consider the change in the distribution curve of ambient noise levels caused by noise intrusions. In the case of the Robinson Gardens, the noise impact is evaluated according to the degree of shift in the ambient noise distribution curve caused by the project activities. The degree of change in the ambient noise distribution curve must significantly exceed the amount of expected daily noise fluctuations for negative noise impact from a proposed project to occur.

"A review of the noise monitoring data for Cove way and Elden Way indicates that increased traffic on these streets which is related to the subject project will not significantly change the ambient noise distribution curve. There are several reasons for this conclusion:

- a. The number of employees on the Estate will be less than employed by Mrs. Robinson. This will reduce the number of vehicle trips and associated noise of employees' automobiles.

- b. With the exception of the daily tours, seminars and other events related to the subject project will occur with less frequency than social affairs hosted by Mrs. Robinson.
- c. Traffic noise attributed to the tours will occur Tuesday through Saturday during four approximately one-half hour periods--9:30-10:00 a.m. and 1:30-2:00 p.m. when visitors are arriving for the tours, and 12:00-12:30 p.m. and 4:00-4:30 p.m. when visitors are departing after the tours.
- d. The increased traffic for the maximum one-per-month special evening events will be over a short period of time as guest will arrive and depart at approximately the same time; these functions will not significantly change the ambient noise distribution curve; and all parking for these events will be on the Estate.

"Noise impacts generated within the Estate are not expected to be any greater than in the past for the following reasons: .....

- a. The number of gardeners working and operating power equipment has been reduced.
- b. The tours will be conducted without the use of amplification equipment by one tour guide.
- c. With visitors prohibited from a large portion of the Estate's perimeter (see Figure 3), the distance between the tour groups and neighbors will help attenuate sound from the Estate.
- d. The irregular topography and vegetation are natural noise damping characteristics of the site."
- e. The future tennis court parking will be used only one day per month and the existing north wall of the court will help attenuate automobile sounds.

A masonry wall with a minimum density of at least 5 lbs/ft and approximately 6 feet in height can effectively reduce parking lot noise; however, due to the low activity level expected in the parking lot and the fact that the dominant noise source is traffic on Cove Way, the wall would be of little use in reducing community noise levels. Landscaping would not reduce the noise from the parking lot. Due to the fewer number of gardeners' automobiles parked in the Cove Way lot than during Mrs. Robinson's residence, the noise and visual impact will be reduced.

Section III, C, Mitigation Measures Proposed to Minimize Significant Effects, fifth paragraph, has been revised to read as follows:

"Where neighboring uses are extremely close to the property lines, plants have been located to grow on existing fences to help protect the privacy of the neighbors; also, in areas where neighbors' privacy may be impaired, tour groups will be prohibited (see Figure 3). Garden tours can be rerouted or prohibited from other areas in the future if they prove to interfere with neighbors' privacy.

"Interference with the neighbors' privacy will also be mitigated by the requirement that a tour guide be with guests at all times on tours of the Estate; guest will not be allowed to tour the grounds unescorted."

2. "... No analysis is made in the Draft of the impact on residents of Cove Way of increased traffic congestion and traffic hazards resulting not only from employee parking but also from other persons and tourists attempting to view the Estate from Cove Way.

"... The Draft indicates that an employee parking lot would be located on Cove Way. No reference is made to the size of the parking lot, whether the area designated can adequately serve as a parking lot, if cars can park on the street, what the traffic impact on Cove Way will be from the employees using the parking lot and what the noise and visual impact will be from the parking of cars. No analysis is made in the Draft to determine if a wall or landscaping in front of the proposed parking lot would lessen the visual and noise impact resulting from employee parking at said site, or whether another site on the Estate would be more appropriate."

The following has been added to Section I, C, Description of Project, of the EIR:

"Employees

"The nine employees on the Estate will consist of a caretaker, a part-time custodian, a tour guide and six gardeners; the caretaker will live on the property. The caretaker, custodian (10:00 a.m. to 4:00 p.m.) and tour guide (9:30 a.m. to 4:00 p.m.) will park in the garage of the residence; the gardeners (7:30 a.m. to 3:30 p.m.) will park off Cove Way in the garage and lot used by Mrs. Robinson's gardening staff. There may occasionally be part-time volunteers assisting in tours of the Estate."

February 15, 1980

The following has been added to Section III, A, 3, Circulation, of the EIR:

"Traffic flow on Cove Way will include a maximum of twelve vehicle trips per day due to the six gardeners who will park in the lot off Cove Way (Figure 3). This same lot was used by Mrs. Robinson's gardeners, who numbered 8-9; therefore, the number of vehicle trips on Cove Way should not be increased above that during Mrs. Robinson's residence."

The garages and adjacent exterior parking area provide adequate space for the gardeners' automobiles to be parked off-street. The visual and noise impact due to the use of Cove Way by the gardeners should be little different from that in previous years. Other parking sites on the Estate will be utilized by visitors and other employees.

Very truly yours,

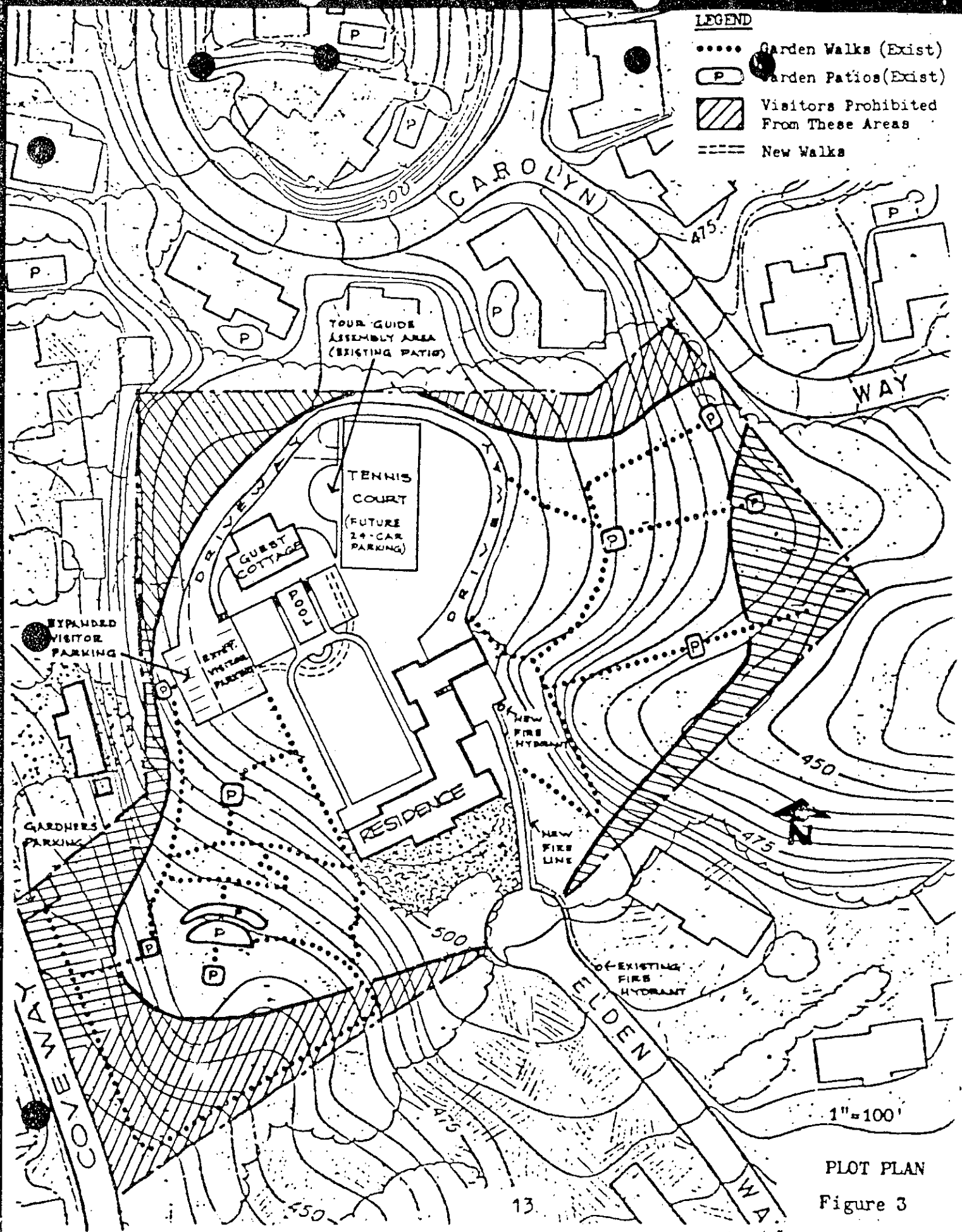
*H. Barmach*

*for*

STEPHEN J. KOONCE  
County Engineer

SJK:mm 22

Attachment



PLOT PLAN  
Figure 3



STEPHEN J. KOONCE  
COUNTY ENGINEER

RAYMOND W. LOOMIS  
ASSISTANT COUNTY ENGINEER

COUNTY OF LOS ANGELES  
DEPARTMENT OF COUNTY ENGINEER-FACILITIES  
550 SOUTH VERMONT, LOS ANGELES, CA 90020

(213) 738 2011

February 15, 1980



BOARD OF SUPERVISORS

PETER F. SCHABARUM  
KENNETH HAHN  
EDMUND D. EDELMAN  
LYVONNE BRATHWAITE BURKE  
BAXTER WARD

Mr. & Mrs. Norman Lee  
1025 Cove Way  
Beverly Hills, California 90210

Dear Mr. & Mrs. Lee:

DRAFT ENVIRONMENTAL IMPACT REPORT  
THE VIRGINIA, ROBINSON ESTATE

Your letter dated August 22, 1978, contained specific comments regarding your review of the aforementioned project. Your comments and our response to those comments are as follows:

1. "... The Draft fails to analyze the visual or noise impact on the residents of Cove Way as a result of the proposed use or as a result of the peculiar topography of the Robinson Estate.  
  
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February 15, 1980

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001744



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Mr. & Mrs. Norman Lee

-5-

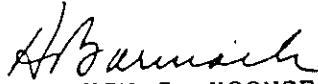
February 15, 1980

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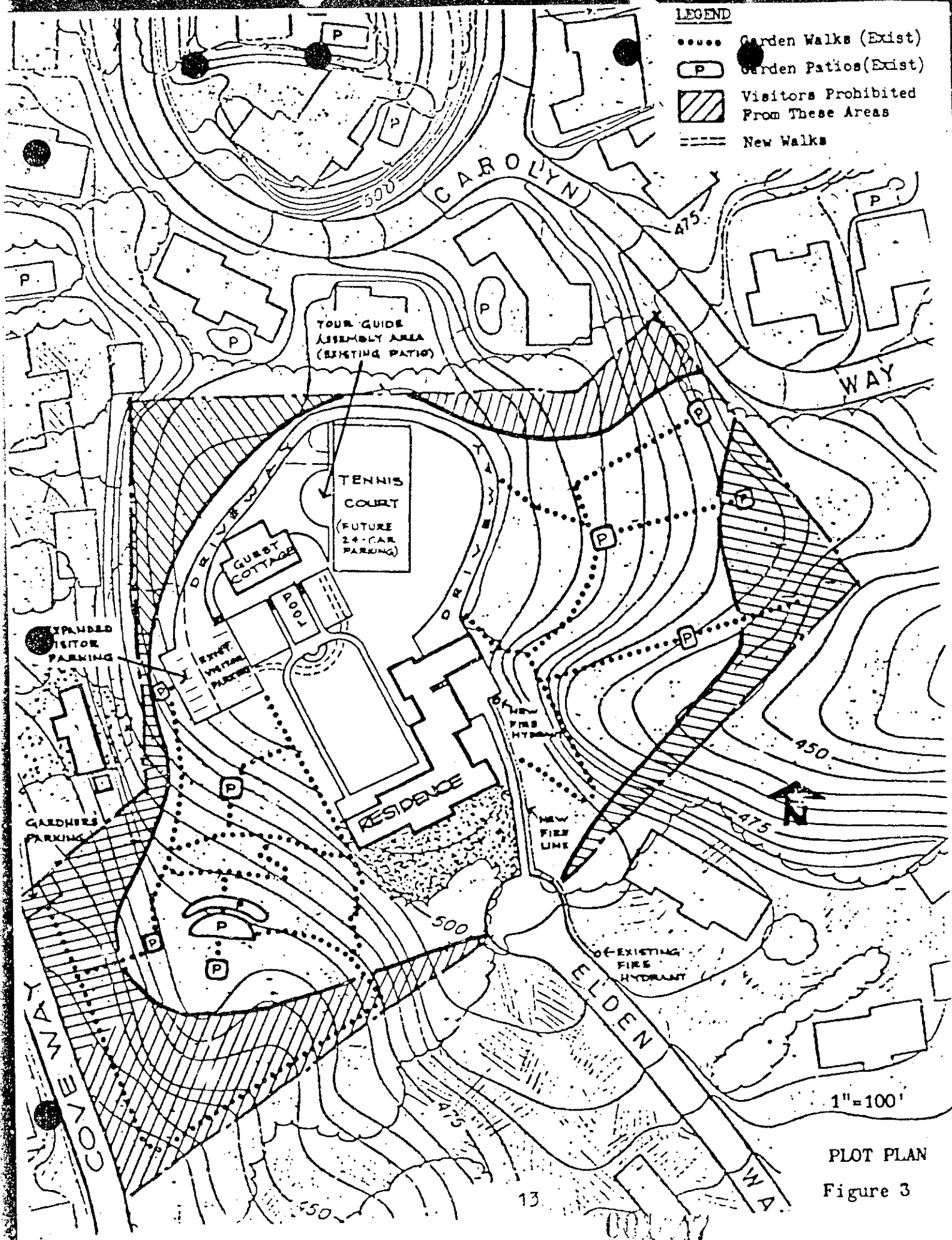
Very truly yours,

*for*   
STEPHEN J. KOONCE  
County Engineer

SJK:mm 22

Attachment

001446



PLOT PLAN  
Figure 3

GREENBERG & GLUSKER  
LAWYERS

ARTHUR N. GREENBERG  
PHILIP GLUSKER  
SIDNEY J. WACHTINGER  
STEPHEN CLAMAN  
AVROM B. GREEN  
HARVEY R. FRIEDMAN  
JON J. GALLO  
JOHN J. PETERS  
MICHAEL A. COLLINS  
JOHN L. CHILD  
BARRY G. WEST  
PHILLIP R. SMITH, JR.  
C. BRUCE LEVINE  
MICHAEL A. GREENE  
MICHAEL S. SHERMAN

WUGH KNOWLTON  
JOSEPH M. CAHN  
GARRETT L. HANSEN  
ROBERT L. LAWRENCE  
NORMAN H. LEVINE  
JAMES E. HORNSTEIN  
MARTYNE L. PISANO  
ROBERT S. CHAPMAN  
MAREN C. DALRYMPLE  
MICHAEL S. KLEIN  
MICHAEL I. ADLER  
RUTH N. HOLZMAN  
F. PATRICIA HUDIE  
JOEL D. RUBEN  
CHARLES N. SHEPARD

RECEIVED

AUG 24 1978

A/E SERVICES

County of Los Angeles

1900 AVENUE OF THE STARS  
SUITE 2000  
LOS ANGELES, CALIFORNIA 90067

TELEPHONE: (213) 853-3810  
CABLE ADDRESS: GREENLER

August 23, 1978

Stephen J. Koonce, County Engineer  
County of Los Angeles  
Department of County Engineer - Facilities  
550 South Vermont Avenue, 12th Floor  
Los Angeles, California 90020

Re: The Virginia Robinson Gardens Arboreta  
and Botanic Gardens Draft Environmental  
Impact Report

Dear Mr. Koonce:

We are the attorneys representing the following  
residents of the immediate area of the proposed Virginia Robinson  
Gardens:

Mr. and Mrs. Robert Dickerman  
1003 Elden Way  
Beverly Hills, California 90210

Mrs. Sylvia Eisenberg  
1016 North Crescent Drive  
Beverly Hills, California 90210

Mr. and Mrs. B. Mokhtarian  
1008 Crescent Drive  
Beverly Hills, California 90210

Mr. and Mrs. David H. Rowen  
1005 Elden Way  
Beverly Hills, California 90210

Mr. and Mrs. Julian Silverstein  
1001 Crescent Drive  
Beverly Hills, California 90210

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DESIGN & CONSTRUCTION BRANCH	Action	Info
BARMACK		
Architect-Engineer		
Contracts Admin.		
Project Management		
Env. Dev.		
File		

001-68

GREENBERG GLUSKER

Stephen J. Koonce, County Engineer  
August 23, 1978  
Page Two

Mr. and Mrs. Joseph Sinay  
1004 Elden Way  
Beverly Hills, California 90210

Enclosed are five copies of our comments regarding the proposed use of the Virginia Robinson Estate, entitled "Comments on the Adequacy of Draft Environmental Impact Report on the Virginia Robinson Gardens Arboreta and Botanic Gardens."

We believe that the Draft Environmental Report is inadequate and that if a decision must be reached at this time, the decision maker must conclude that the proposed use of the Virginia Robinson Estate will have serious detrimental impacts on the neighborhood and the City of Beverly Hills and should not be permitted.

Sincerely,



Arthur N. Greenberg

ANG/ds  
Enclosures

001:49

COMMENTS ON THE ADEQUACY  
OF DRAFT ENVIRONMENTAL  
IMPACT REPORT ON THE VIRGINIA  
ROBINSON GARDENS ARBORETA  
AND BOTANIC GARDENS

The Draft Environmental Impact Report of the Virginia Robinson Gardens Arboreta and Botanic Gardens (hereinafter referred to as the "Draft") is inadequate for the reason that it provides insufficient information to allow the public and the decision-maker to understand, analyze, comment on and reach decisions about the proposed changes and the proposed use of the Virginia Robinson Estate (hereinafter referred to as the "Robinson Estate"). In addition, as set forth below, information and conclusions contained in the Draft with respect to the environmental impact on privacy, traffic, noise, visual field and zoning are incorrect, unsubstantiated or incomplete.

A. The Description of the Use of the Robinson Estate is Inadequate.

At page 7, the Draft states that:

"The Virginia Robinson Gardens will be developed primarily as a research facility for testing, planting and demonstrating the natural growth of plants that cannot be grown in other arboretum facilities. Because of the mild climate at the site, the arboretum will carry on the testing of tropical plants and departmental plant collection programs."

This description is inadequate for the following reasons:

1. It does not indicate the location of other arboretum facilities, the types of plants which are proposed to be grown on the Robinson Estate, or the types of plants that are grown in other arboretum facilities, nor does it contain substantiation of the statement that the plants to be grown on the Robinson Estate cannot be grown at other arboretum facilities. Without such information, it is impossible for the public or the decision maker to evaluate the statement that the Robinson Estate will be used to demonstrate the natural growth of plants that cannot be grown in other arboretum facilities.

2. It neither indicates the types of testing, planting and demonstrating to be carried out at the arboretum facilities nor the purpose of such testing, planting and demonstrating. The types of testing, planting and demonstrating to be carried out are important to the public and the decision maker in determining the environmental impact of the proposed use of the Robinson Estate. If any of the plants are, for example, toxic or malodorous, carry unusual types of pollen, induce allergic reactions, generate uncontrollable growth, or attract plant or animal pests or if unusual or dangerous tests are to be run on plants at the arboretum facilities, the public and the decision maker should be aware of such facts. Therefore, the types of testing, planting and demonstrating should be indicated in the Draft.

3. The reference to a departmental plant collection program is also confusing. What department? What types of plants will be collected? How extensive will such a program be? How will it be implemented? Where will plants be collected from? How will they be transported to the arboretum facility? How large will they be? Where will they be kept at the arboretum facility? How will the plants affect the arboretum facility and the surrounding area? The departmental plant collection program, if it involves substantial additional use of the Robinson Estate, would alter the conclusions contained in the Draft (discussed hereinafter) in regard to amount of traffic, noise, impact on privacy and alteration of the visual field. The fact that the Draft contains no detailed explanation of the departmental plant collection program prevents the general public and the decision maker from making a complete evaluation of the environmental impact of the proposed arboretum.

B. The Description of the Arboretum Education Program and Proposed Tours is Inadequate.

The Draft states that:

"The Arboretum Education Program will include special tours of the grounds for biology, botany, horticulture and other related classes and organization activities. Public visitation will be by group reservation only, with hours of operation normally between 11 a.m. and 4 p.m. weekdays and closed weekends and holidays. The guest cottage would be used for seminars and classes with a posted occupancy capacity of 49. The residence would also be available for public tours."



The separate references to the Arboretum Education Program including special tours, public visitation by group reservation, use of the guest cottage for seminars and classes and public tours of the residence are confusing. Although it is possible that such separate references are to one type of tour, it seems to indicate that up to four separate types of uses are being considered: special educational tours, public visitation by group reservation, classes and seminars at the guest cottage and public tours of the residence. Crucial references later in the Draft to the number of people expected to use the Robinson Estate, which number affects noise levels, privacy, traffic and the visual field, do not appear to take into account four separate types of tours. Assuming that more than one type of tour is contemplated, the general public and the decision maker need to know the answers to the following questions:

- (a) How many people would be involved in each of these activities?
- (b) Would these uses overlap?
- (c) How heavy would the traffic flow be for each of these activities?
- (d) At what hours would each of these activities be carried out?
- (e) In what numbers would they be carried out?

(f) Would the seminars and classes to be held at the guest cottage be associated with other uses of the premises or would the guest cottage be available separately?

(g) What type of tours of the residence would be offered?

(h) What would be done to the residence to make it ready for public tours?

(i) How would each of the various tours be advertised and to whom?

C. The Draft is Inadequate in that it Fails to Discuss the Number of Employees Who Would be Employed or Otherwise Active on the Robinson Estate.

Although it is obvious that a substantial number of employees will be required on the property for tours, maintenance, operation of the research facility, operation of the departmental plant collection program, construction work, and for various supervisory functions, the impact of the presence of such employees and the traffic generated by them on noise levels, privacy, traffic and the visual field are not reflected in the Draft at all. Without such information, it is impossible for the general public and the decision maker to adequately analyze the impact of the proposed use of the Robinson Estate.

D. The Draft Contains a Reference by Implication to Potential Special Uses of the Robinson Estate Other Than at Regularly Scheduled Hours, Without Any Discussion of Such Special Uses.

The Draft states that "Public visitation will be by group reservation only, with hours of operation normally between 11 a.m. and 4 p.m. weekdays and closed weekends and holidays."

The word "normally" would seem to indicate that use of the Robinson Estate is or may be contemplated at hours other than 11 a.m. to 4 p.m. weekdays. In order to adequately evaluate the Draft, the public and decision maker need to know when exceptions will be made to "normal" hours and the terms and conditions under which such use or uses would be permitted. Many of the conclusions drawn in the Draft are premised on use of the Robinson Estate only between certain hours and on certain days. If exceptions are to be made, the public and the decision maker should be aware of such exceptions and the terms and conditions under which exceptions will be granted.

E. The Draft is Inadequate in Its Discussion of Site Development and Construction.

At page 7, the Draft discusses site development, including conversion of a tennis court to guest parking for approximately 24 cars, construction of a "Tour Guide Assembly

Area" and comfort station, widening and paving of the driveway and paving of sidewalks throughout the Robinson Estate. There is no discussion in the Draft of the environmental problems created by conversion of the tennis court, construction of the Tour Guide Assembly Area and comfort station, widening and paving of the driveway and paving of sidewalks throughout the Robinson Estate.

The Draft almost completely ignores the impact of construction. The final paragraph on page 23 suggests that "Construction related to the development of the Robinson Gardens will cause a short-term increase in noise levels." This sentence, which contains the entire discussion of the impact of construction in the Draft, is inadequate both in its analysis of the noise level and in its avoidance of discussion of the impact of construction on privacy, traffic and the visual field. The general public and the decision maker should be more fully informed in order to allow them to weigh, analyze, comment and reach determinations.

In addition, no mention is made of work which must be done in setting up facilities for testing, planting and demonstrating the natural growth of plants, nor is mention made of work to be done setting up the departmental plant collection program mentioned in the Draft. Without information as to setting up of such programs and facilities, the public and decision maker are unable to make a fully informed decision as to the effects of the proposed use of the Robinson Estate.

Although mention is made in the Draft of conversion of the tennis court to a parking lot, there is no mention in the Draft of an employee parking lot. Note that the Plot Plan at page 8, figure no. 3, shows an employee parking lot on Cove Way. The Draft gives no indication as to how such parking lot is to be constructed, why the location was chosen, how access is to be gained to such parking lot, how many cars will use the parking lot and at what hours. Obvious and important environmental impacts of such a parking lot are not raised by the Draft and cannot be properly analyzed by the public or decision makers

F. The Draft Contains an Inadequate Discussion of the Impact of Registration as a Point of Historical Interest and Placement on the National Register of Historical Places.

The Draft at page 7, indicates that the Los Angeles County Historical Landmarks Committee has recommended and the Board of Supervisors has endorsed the recommendation that the residence on the Robinson Estate be registered as a point of historical interest. Application has also been made to the National Park Service for placement of the residence on the National Register of Historical Places. There is no discussion in the Draft in regard to increased public interest and traffic as a result of such designation. More people will become aware of the residence and its nature and it is likely, for example, that local newspapers, magazines and broadcast media will publicize the location of and

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function of the residence and its availability for public use and visitation. It is also likely that the residence will be listed on tourist maps and other tourist information sources. The City of Beverly Hills has recently been presented with direct evidence that controversy with regard to a residence (Sunset Boulevard between Alpine and Rexford) can draw crowds of people causing traffic congestion, traffic hazards, noise, and substantial detrimental impact on personal privacy of neighbors. If a residence on Sunset Boulevard, a heavily traveled divided boulevard, can cause such problems, what might happen to homes on a residential cul-de-sac? Certainly the public and the decision maker should consider the impact of such designations on the number of people likely to use the Robinson Estate, since the number of people is such a crucial variable in determining the impact on noise, traffic, privacy and the visual field.

G. The Proposed Land Use is in Direct Conflict with the Land Use Element of the City of Beverly Hills General Plan, Which Recommends that Existing Residential Areas Should be Retained in Residential Use.

The Land Use Section of the Draft, at page 18 states that:

"The Robinson property is zoned R-1, Single Family Residential. The surrounding neighborhood is also zoned R-1. The proposed project will require a determination to be made by the Beverly Hills Planning Commission, pursuant to Section 65402 of the Government Code, as to the project's conformance to the General Plan. The Beverly Hills General Plan designates the project site as Single Family Residential."

The proposed project is not in conformance with the General Plan, as may be seen by reference to the Land Use Element of the City of Beverly Hills General Plan, dated May, 1977. The Land Use Element is a major part of the 1967 General Plan, with certain revisions adopted from a 1973 Citizen's Committee Report, which was adopted in 1974. The Land Use Element states at page 16, that "The General Plan proposes the protection and continual renewal of the single family areas in the City." The 1973 Report, detailed at page 20 of the Land Use Element, supports and reinforces this recommendation by stating that "Existing residential areas should be retained in residential use." The proposed use of the Robinson Estate is in violation of the Land Use Element of the Beverly Hills General Plan.

H. The Analysis of Traffic Impact Due to the Proposed Development of the Robinson Estate is Inadequate and Incorrect.

On page 19, the Draft estimates that the traffic flow on Elden Way and Crescent Drive may increase by 96 cars per day. This estimate is based on restricted hours of

operation from 11 a.m. to 4 p.m. on weekdays, the maximum of two reserved tours a day lasting approximately 1.5 hours each and a visitor parking capacity of 24 cars. The estimate of increased traffic flow contained in the Draft was arrived at by multiplying 24 visitor parking spaces by 2 for the two tours and again by two to account for arrival and departure of each car. On page 28, the Draft estimates that such increase represents a 26% increase in traffic flow on Crescent Drive. For the following reasons, such analysis of circulation is inadequate:

1. The estimate of a 26% increase is for traffic on Crescent Drive. The Draft contains no discussion of the percentage increase in traffic on Elden Way, evidently due to the fact that there are no base line figures for Elden Way, a dead-end street. Crescent Drive, which is semicircular at the point of its intersection with Elden Way, continues beyond Elden Way and not all traffic on Crescent Drive enters Elden Way. Therefore, assuming that all of the cars going to the Robinson Estate would enter Elden Way, the influx of cars per day would represent a far greater percentage increase in traffic on Elden Way than the 26% which the Draft estimates to be the increase on Crescent Drive. An accurate estimate of the increase in traffic on Elden Way is necessary for the public and the decision maker to allow them to determine the impact of the proposed use on residents of Elden Way.



2. According to the Draft, on-street parking is permitted on both sides of Elden Way and Crescent Drive. The discussion of Circulation does not take into account the impact on the traffic and parking needs of local residents if on-street parking is used by visitors to the Robinson Estate.

3. The estimate appears to be based on tours of the botanical garden and not of the guest cottage for seminars and classes, public visitation by group reservation or public tours of the residence. Other uses would result in increased traffic.

4. There would be additional traffic generated by staff personnel, maintenance personnel and construction of the facility.

5. As discussed hereinabove in Section F, people will become aware of the Robinson Estate and its nature through various local media and tourist information sources. People may well appear, park on the street and attempt to use the Robinson Estate without reservations. Such use would result in a substantial increase in traffic in the area and would increase the amount of on-street parking.

6. In addition, the Draft does not take into account potential future use changes and increased activity, which cannot be ruled out based on any information contained in the Draft.

Unless the increase in traffic is accurately measured, the general public and the decision maker will not be able to reach a fully-reasoned decision as to the impact of the proposed use change on the neighborhood. Increased traffic brings with it an increase in noise in the area, a decrease in privacy of neighbors, increased danger to young children and others walking near or on streets in the neighborhood, increased risk of robbery, burglary and other criminal offenses (and probable increase in insurance rates) and other environmental impacts, all of which also would tend to have an adverse impact on property values in the neighborhood.

I. Investigation of Noise Levels in the Neighborhood was Inadequate and the Conclusions of the Draft with Regard to Noise Levels are Therefore Unsubstantiated.

The Draft reaches the conclusion that any increase in noise should not be perceived as substantial by residents. In reaching this conclusion, the Draft relies on Appendix 1, a community noise evaluation of the Robinson Estate conducted by the Department of Health Services. The only noise measurements made in reaching the conclusions contained in the Draft were those made in a single survey for a period of twenty minutes between 11:40 a.m. and 12:00 p.m. at a single site at 1003 Elden Way approximately 200 feet south of the entrance gate to the gardens. This survey ignored other locations where sound measurements should have been taken.

The survey also ignored the increased noise levels caused by tour operation, maintenance, construction and other activities. Aside from the simple statement that "Where tours pass close to property lines, the noise levels will be higher but not substantial," there was no investigation of noise levels in the Robinson Estate vis-a-vis neighboring parcels of property. Measurements should have been made at several locations on the street, at locations on neighboring properties all around the Robinson Estate and on neighboring properties close to the street. Without such information, the general public and the decision maker cannot make a reasoned decision as to the impact of the Robinson Estate on noise levels in the neighborhood.

In addition, it should be noted that calculation of ambient noise levels is dependent upon the amount of traffic, since the number of cars and people using the property is probably the largest variable factor in the amount of noise. The inaccuracies pointed out in the section on Circulation indicate that there is likely to be more traffic, and therefore, more noise than is indicated by the Draft.

J. The Draft does not Sufficiently Discuss and Analyze the Impact of the Proposed Development on the Privacy of Neighbors.

The Draft concedes on page 28, that there ". . . may be a loss in privacy realized by neighbors in the area" but

the Draft does not adequately consider the impact of the proposed development on such loss of privacy. For example, the Draft does not consider the possibility of on-street parking, discussed above. People walking about the neighborhood would have a major impact on privacy in the area. The Draft also does not discuss the impact of designation of the Robinson Estate as a historical point of interest, as discussed above. Again, this could have a substantial impact on the privacy of neighbors.

The Draft concedes on page 29, that ". . . A swimming pool located in the backyard of a single family residence adjacent to the Robinson Property is very visible from one of the brick pathways traversing the estate." This points out the obvious interference with privacy which will result from people walking around (or even off) the Robinson Estate, which adjoins several neighboring pieces of property. People will be unable to use their backyards in a free manner and, in cases in which there is a swimming pool or other facility located in their yard, their privacy will be substantially affected. Although the Draft suggests that fences be constructed to help mitigate this privacy loss experienced by neighbors, the Draft fails to consider the aesthetic effect of construction of such fences. Obviously, construction of fences could adversely alter the appearance of the neighborhood and will substantially detract from the appeal of the existing open spaces.

It is our belief that the proposed use of the Robinson Estate will have a substantial negative impact on the privacy of neighbors. It will curtail activities in the privacy of their yards, limit the freedom of children at play, increase risk of criminal activity and the cost of insurance, increase risk of traffic accidents, infringe on the ability of residents and guests to park on the street, and increase the number of people in the neighborhood. The people and the decision maker should be aware of these adverse impacts on the privacy of the residents of the neighborhood.

K. This Draft Does not Adequately Explore the Visual Effect on the Proposed Development.

The Draft concludes on page 18 that:

"This Land Use Change will not significantly alter the surrounding neighborhood visually, as very little development is proposed. Aesthetically, the project will be difficult to see from the entrance on Elden Way because the proposed gardens are surrounded by dense vegetation. Parking will be provided on site, preventing the visual blight of parked cars in the neighborhood."

This approach has several major shortcomings:

1. It considers the visual effect only from the entrance on Elden Way, failing to appropriately analyze the visual effect on neighboring pieces of property. It is likely that there will be substantial visual effect on neighboring parcels of property, including visible parked

cars, the Tour Guide Assembly Area and Comfort Station, visible widened sidewalks throughout the Robinson Estate, any developmental work which is done on the Robinson Estate and is visible, the employee parking lot shown on the Plot Plan, Figure 3 on page 8, and the visual impact of people on the Robinson Estate in tour groups or otherwise. In addition, the visual impact of on-street parking is not considered in the Draft.

There is discussion in the section on Mitigation Measures Proposed to Minimize Significant Effect on page 29, of construction of solid fences to help mitigate the privacy loss experienced by neighbors as a result of the proposed project. However, as set forth herein, construction of such fences would result in substantial negative visual impact on the neighborhood.

The people and the decision maker should be aware of these factors which will impact visually on the neighborhood.

#### Conclusion

The Draft is inadequate. However, if a decision must be reached at this time, the decision-maker must conclude that the proposed use of the Robinson Estate would have serious detrimental impacts on the neighborhood and the City of Beverly Hills and should not be permitted.



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February 15, 1980

Mr. Arthur N. Greenberg  
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1900 Avenue of the Stars  
Suite 2000  
Los Angeles, California 90067

Dear Mr. Greenberg:

DRAFT ENVIRONMENTAL IMPACT REPORT  
THE VIRGINIA ROBINSON GARDENS

Your letter dated August 23, 1978, contained specific comments regarding your review of the aforementioned project. Your comments and our response to those comments are as follows:

1. " . . . The Description of the Use of the Robinson Estate is Inadequate . . . for the following reasons:

" . . . It does not indicate the location of other arboretum facilities, the types of plants which are proposed to be grown on the Robinson Estate, or the types of plants that are grown in other arboretum facilities, nor does it contain substantiation of the statement that the plants to be grown on the Robinson Estate cannot be grown at other arboretum facilities.

" . . . It neither indicates the types of testing, planting and demonstrating to be carried out at the arboretum facilities nor the purpose of such testing, planting and demonstrating.

" . . . If any of the plants are, for example, toxic or malodorous, carry unusual types of pollen, induce allergic reactions, generate uncontrollable growth, or attract plant or animal pests or if unusual or dangerous tests are to be run on plants at the arboretum facilities, the public and the decision maker should be aware of such facts."

Section I, C, Description of Project, has been revised to read as follows:

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"Plant Testing Facility

"The Virginia Robinson Gardens will be developed primarily as a facility for testing, planting, and demonstrating the natural growth of plants that cannot be grown at other Arboretum facilities, which are: Los Angeles State and County Arboretum, 301 North Baldwin Avenue, Arcadia, California 91006; Descanso Gardens, 1418 Descanso Drive, La Canada, California 91011; and South Coast Botanic Garden, 26300 Crenshaw Boulevard, Palos Verdes Peninsula, California 90274.

"Because of the mild climate at the site, the Arboretum will carry on the testing of tropical plants and departmental plant collection programs. The types of plants to be grown at the Robinson Gardens are subtropical, especially palms, flowering trees, gingers, ferns, biomeliads and plumeria that may not be grown at other facilities.

"Plants already in the Robinson Gardens indicate the subtropical climate of this area is ideal for growing subtropical plants. Ficus trees may be observed in the garden with aerial roots, a phenomena not seen in any other public garden in this area. The winter of 1979, was a graphic example of the climatic difference of the Robinson Gardens. All Arboreta and Botanic Gardens' facilities suffered heavy frost damage; none was observed in the Robinson Gardens.

"One of the primary purposes of the Department of Arboreta and Botanic Gardens is to introduce plants from other parts of the world and test them for their potential to be introduced into the Southern California horticulture. Already, the Department has introduced more than 80 different plant species to enrich our environment through the addition of new plant species to Southern California horticulture. Plants are acquired from other botanic gardens around the world through an active seed exchange program. The plants are not unknown to botanists and horticulturists but are new to this area. Since the primary aim is to acquire new ornamental species, plants known to be toxic in any manner will not be considered for testing. Examples of plants to be tried might include Delonix regia and Spathodea spp.

"The testing conducted by the Department of Arboreta and Botanic Gardens consist of evaluating plants which are to be considered for introduction into the Southern California environment by planting at Arboretum facilities and judging the adaptability to the soils and climate, the growth rate, flowering characteristics and desirability in the local landscape.



"The "testing" of the plants includes various watering schedules, amounts of shade/sunshine and a variety of soil mixtures and nutriment. There will be no "scientific" experiments beyond that which could be conducted by any local horticulturist. As mentioned above, plants known to be toxic or undesirable in any manner are not accepted by the Arboretum for testing; also, if any undesirable characteristics are discovered by the Arboretum, subject plants would not be recommended for introduction into the local landscape."

Also refer to Plant-Introduction Program, Department of Arboreta and Botanic Gardens, January 1, 1971 and Procedures on Acquisitioning, Accessioning and Record Keeping, Plant-Introduction Program, Department of Arboreta and Botanic Gardens, January 1, 1971, in the Appendix of the Final EIR.

2. "... The reference to a departmental plant collection program is also confusing. What department? What types of plants will be collected? How extensive will such a program be? How will it be implemented? Where will plants be collected from? How will they be transported to the arboretum facility? How large will they be? Where will they be kept at the arboretum facility? How will the plants affect the arboretum facility and the surrounding area?"

The following has been added to Section I, C, Description of Project:

"The collection program of the Department is related directly to the plant introduction program whereby plants are collected from other areas of the world to be tested here for their ornamental value. The program has already been implemented and will be expanded to include more subtropical plants species to be grown at the Robinson Gardens. These plants will come from around the world and be transported to the Robinson facility by pick-up truck once established in containers of 1-5 gallon size. They will be planted and grown in the Robinson Gardens as part of the landscape feature."

Also refer to Plant Collections Program, A Supplement to the Plant Introduction Program, June 1, 1977, in the Appendix of the Final EIR.

3. "... The Description of the Arboretum Education Program and Proposed Tours is Inadequate. . . . The separate references to the Arboretum Education Program including special tours, public visitation by group reservation, use of the guest cottage for seminars and classes and public tours of the residence are confusing. Although it is possible that such separate references are to one type of

tour, it seems to indicate that up to four separate types of uses are being considered: special educational tours, public visitation by group reservation, classes and seminars at the guest cottage and public tours of the residence. . ."

Section I, C, Description of project, has been revised to read as follows:

"Public Use

"a. Visitors

"In addition to testing of plants the Arboretum education program will include special tours of the grounds for biology, botany and horticulture groups with related classes and seminars. Public visitation will be by group reservation only, with hours of operation normally between 10 a.m. and 4 p.m. Tuesday through Saturday and closed Sundays, Mondays and holidays, with limited exceptions. The twice daily tours, 10:00-12:00 and 2:00-4:00, will each be limited to fifty persons and twenty automobiles. With the exception of a maximum of two events annually, as discussed under Article 5 of this letter, all visitors will be required to park on the site.

"The tours of Virginia Robinson Gardens will be conducted by a tour guide who will explore the botanical and landscaping values of the estate, the guest house and residence. The guide will be with the guests at all times; guests will not be free to explore the Estate independently. Information regarding the tours will be directed toward horticultural/ botanical groups: reservations will be made by telephone and confirmed by mail as in the case of the Getty Museum and the UCLA Japanese Gardens. Parking will be carefully controlled on the grounds. There will not be any on-street visitor parking.

"Group tour by bus may occasionally be in lieu of one of the above tours. Buses will leave visitors at the Gardens' entrance on Elden Way and pick them up at the end of the tour. Buses will be required to park off-site and away from residential areas. On occasion when a special group is authorized to remain longer than the regular time allowed, public tours will not be scheduled to overlap with the special group.

b. Classes and Seminars

"Classes and seminars may be scheduled periodically in the guest cottage; these will be limited in the same fashion

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as indicated above. Luncheon meetings may also be scheduled periodically and limited in number to eighty persons; number of vehicles, twenty. These will probably be held on the lawn or patio areas as the guest cottage will have a posted occupancy of forty-nine persons. The residence will also be available for public tours. Public tours and special group tours will not be scheduled in the event a luncheon meeting, class, or seminar is held on a given day."

Please refer to Article 5 of this letter for discussion of special uses.

4. "... The Draft is Inadequate in that it Fails to Discuss the Number of Employees Who Would be Employed or Otherwise Active on the Robinson Estate."

The following has been added to Section I, C, Description of Project:

"Employees

"The nine employees on the Estate will consist of a caretaker, a part-time custodian, a tour guide and six gardeners; the caretaker will live on the property. The caretaker, custodian (10:00 a.m. to 4:00 p.m.) and tour guide (9:30 a.m. to 4:00 p.m.) will park in the garage of the residence; the gardeners (7:30 a.m. to 3:30 p.m.) will park off Cove Way in the garage and lot used by Mrs. Robinson's gardening staff. There may occasionally be part-time volunteers assisting in tours of the Estate"

Also, refer to subsequent responses relative to traffic and noise.

5. "... The Draft Contains a Reference by Implication to Potential Special Uses of the Robinson Estate Other Than at Regularly Scheduled Hours, Without Any Discussion of Such Special Uses."

Please refer to Article 3 of this letter for discussion of regularly scheduled hours of use.

The following has been added to Section I, C, Description of Project:

"c. Special Uses

"Special uses will be similar to those conducted by Mrs. Robinson during her tenancy, and, therefore, no more obtrusive to the community. For many years Mrs. Robinson invited the Hollywood Bowl patronesses to her

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home to hold their annual kickoff banquet prior to the Hollywood Bowl season. Approximately 500 guests appear at this event annually. Another of Mrs. Robinson's annual large gatherings was her August Moon Ball celebrating her birthday. Future large gatherings which the Department of Arboreta and Botanic Gardens may sponsor would be fund-raising events for Virginia Robinson Gardens and possibly the continuation of the traditional banquet for the Hollywood Bowl Patronesses. No more than two events of this magnitude will be held annually; as with any private event of this magnitude, parking would be by valet service.

"In addition, not more than twelve unobtrusive evening events will be held annually; these may include special horticultural meetings and fund-raising banquets for Virginia Robinson Gardens. Parking for these events will be limited to forty-five cars, including twenty-four cars parked on the tennis court, which may be converted to parking in the future. The tennis court parking will be for these special evening events only and not for the daily tours; there will be no on-street parking for these events.

"Commercial filming, subject to any legal restrictions, may occasionally be permitted on the Estate. This use would be subject to the same restrictions as the tour groups, including no on-street parking and prohibition from certain areas (Figure 3) to protect the neighbors' privacy. Public visitation would not be allowed on days that filming is permitted."

6. " . . . The Draft is Inadequate in Its Discussion of Site Development and Construction.

"At Page 7, the Draft discussed site development, including conversion of a tennis court to guest parking for approximately 24 cars, construction of a "Tour Guide Assembly Area" and comfort station, widening and paving the driveway and paving of sidewalks throughout the Robinson Estate. There is no discussion in the Draft of the environmental problems created by conversion of the tennis court, construction of the Tour Guide Assembly Area and comfort station, widening and paving of the driveway and paving of sidewalks throughout the Robinson Estate."

The Tour Guide Assembly Area will not require construction but will utilize the existing patio area adjacent to the tennis court; a new comfort station will not be constructed but the existing guest

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cottage toilets will be remodeled; the driveway will not be widened; existing sidewalks will not be paved, only repaired to eliminate safety hazards; some new walks will be constructed (see Figure 3) for handicapped access from the parking lot to the guest cottage.

Section I, C, Description of Project, has been revised to read as follows:

"Site Development

"Site development is included in the proposed project to bring the Virginia Robinson Estate up to current health and safety standards relating to public facilities.

"Major construction activities on the site will include:

- a. Expand and pave the parking area west of the guest cottage to accommodate 15 automobiles;
- b. Pave existing driveway, from the rear of the residence to visitor parking area, to provide better access;
- c. Repair existing paved walks throughout the Estate and install some handrails to eliminate safety hazards;
- d. Install some walks and handicapped ramp for access to guest cottage;
- e. Install fire hydrant on site;
- f. Remodel existing guest cottage restrooms for the public, with handicapped facilities.
- g. Possible future conversion of tennis court to parking area for 24 cars.

"Additionally, the guest cottage and main residence will require general maintenance, painting and minor alterations in terms of access to bring them up to existing standards for public occupancy."

7. "... The Draft almost completely ignores the impact of construction. The final paragraph on page 23 suggests that 'Construction related to the development of the Robinson Gardens will cause a short-term increase in noise levels.' This sentence, which contains the entire

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discussion of the impact of construction in the Draft, is inadequate both in its analysis of the noise level and in its avoidance of discussion of the impact of construction on privacy, traffic and the visual field."

The following has been added to Section III, B, Significant Environmental Effects Which Cannot Be Avoided If The Project Is Implemented:

"There may be some increase in noise, traffic and visual disturbance during construction."

The following has been added to Section III, C, Mitigation Measures Proposed to Minimize Significant Effects:

"The increase in noise and traffic during construction will be mitigated by: requiring the contractor to adhere to a comprehensive noise abatement program; the limitation on vehicle size due to the size of the porte-cochere on the site; and the limited amount of proposed construction which will consist primarily of driveway and sidewalk paving, parking area with retaining wall, fire hydrant, interior maintenance and repairs and future modifications to convert the tennis court to a parking area. There will be no building construction. Visual disturbances and intrusion on neighbors' privacy during construction will also be mitigated by the size of the Estate, which will screen many of the construction activities, the existing vegetation and the recent landscaping installed along the property lines."

Also refer to Article 18 of this letter for discussion of noise.

8. "...In addition, no mention is made of work which must be done in setting up facilities for testing, planting and demonstrating the natural growth of plants, nor is mention made of work to be done setting up the departmental plant collection program mentioned in the Draft. Without information as to setting up of such programs and facilities, the public and decision maker are unable to make a fully informed decision as to the effects of the proposed use of the Robinson Estate."

The abovementioned items have been discussed in Articles 1 and 2 of this letter.

9. "... Although mention is made in the Draft of conversion of the tennis court to a parking lot, there is no mention in the Draft of an employee parking lot. Note that the Plot Plan at Page 8, Figure no. 3, shows an employee

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parking lot on Cove Way. The Draft gives no indication as to how such parking lot is to be constructed, why the location was chosen, how access is to be gained to such parking lot, how many cars will use the parking lot and at what hours."

The following has been added to Section I, C, Description of Project:

4. "Employees

"The nine employees on the Estate will consist of a caretaker, a part-time custodian, a tour guide and six gardeners; the caretaker will live on the property. The caretaker, custodian (10:00 a.m. to 4:00 p.m.) and tour guide (9:30 a.m. to 4:00 p.m.) will park in the garage of the residence; the gardeners (7:30 a.m. to 3:30 p.m.) will park off Cove Way in the garage and lot used by Mrs. Robinson's gardening staff. There may occasionally be part-time volunteers assisting in tours of the Estate."

The following has been added to Section III, A, 3, Circulation:

"Traffic flow on Cove Way will include a maximum of twelve vehicle trips per day due to the six gardeners who will park in the lot off Cove Way (Figure 3). This same lot was used by Mrs. Robinson's gardeners, who numbered 8-9; therefore, the number of vehicle trips on Cove Way should not be increased above that during Mrs. Robinson's residence."

10. ". . . The Draft Contains an Inadequate Discussion of the Impact of registration as a Point of Historical Interest and Placement on the National Register of Historical Places.

". . . There is no discussion in the Draft in regard to increased public interest and traffic as a result of such designation. More people will become aware of the residence and its nature and it is likely, for example, that local newspapers, magazines and broadcast media will publicize the location of and function of the residence and its availability for public use and visitation."

The following has been added to Section I, C, Description of Project:

"The Robinson Estate was placed on the National Register of Historic Places November 15, 1978, and is registered as a point of historic interest with the notation that access is restricted."

Although discussed in the EIR, this registration was not contingent on the final disposition of the EIR. Such registration will not alter the use of the Robinson Estate as an arboretum or increase the permitted number of visitor or automobiles on the site. Advertising and reservations for tours are discussed in Article 3 of this letter.

11. " . . . The Proposed Land Use is in Direct Conflict with the Land Use Element of the City of Beverly Hills General Plan, which Recommends that Existing Residential Areas Should be Retained in Residential Use."

The relation of Beverly Hills General Plan to the development of Virginia Robinson Gardens is discussed in Section I, B, Objectives; the County's only legal obligation is to comply with Government Code Section 65402.

12. " . . . The Analysis of Traffic Impact Due to the Proposed Development of the Robinson Estate is Inadequate and Incorrect."

" . . . On Page 28, the Draft estimates that such increase represents a 26% increase in traffic flow on Crescent Drive. For the following reasons, such analysis of circulation is inadequate:

- "1. The estimate of a 26% increase is for traffic on Crescent Drive. The Draft contains no discussion of the percentage increase in traffic on Elden Way, evidently due to the fact that there are no base line figures for Elden Way, a dead-end street.

" . . . assuming that all of the cars going to the Robinson Estate would enter Elden Way, the influx of cars per day would represent a far greater percentage increase in traffic on Elden Way than the 26% which the Draft estimates to be the increase on Crescent Drive. An accurate estimate of the increase in traffic on Elden Way is necessary. . . ."

The fifth paragraph under Section III, A, 3, Circulation, has been revised to read as follows:

"The Robinson Gardens will provide 20 visitor parking spaces and will be open from 10 a.m. to 4 p.m. Tuesday through Saturday. Based on these restrictions and a maximum of



two reserved tours a day lasting approximately two hours each, traffic flow on Elden Way and Crescent Drive may increase by 80 vehicle trips per day (40 vehicle trips per tour) due to visitors plus 4 vehicle trips due to employees (1 tour guide and 1 part-time custodian) for a total of 84 vehicle trips per day.

"When the tennis court is converted for future parking for 24 cars, the number of vehicle trips will be increased by 88 vehicle trips per day (total of 44 on-site parking spaces) to a total of 172 vehicle trips for the one day per month on which special evening events are held (maximum of twelve annually).

"This compares to the current estimate of traffic flow on Crescent Drive of 181 cars per day in one direction of travel (see Figure 8, Southbound at intersection of Lexington and Crescent), and 59 cars per day on Elden Way based on the August, 1975 City of Los Angeles EIR Guidelines of 9.82 vehicle trips per day per hillside dwelling unit; the City of Beverly Hills has no comparable guidelines."

Section III, B, Significant Environmental Effects Which Cannot Be Avoided If the Project Is Implemented, Article 1, has been revised to read as follows:

"An increase in traffic flow will occur on Elden Way and Crescent Drive. Traffic on these streets will increase by approximately 84 vehicle trips per day between the hours of 10 a.m. and 4 p.m. Tuesday through Saturday. This increase compares with the current estimate of 181 cars per day traveling southbound on Crescent Drive near the Lexington Road intersection. No traffic counts are available for the northbound lane of Crescent Drive north of Lexington Road; however, they are assumed to be approximately the same as figures for the southbound lane making total traffic flow on Crescent Drive equal to approximately 362 cars per day. Although no existing traffic count is available for Elden Way, it may be assumed to be approximately 59 vehicle trips per day (using the August, 1975 City of Los Angeles EIR Guidelines of 9.82 vehicle trips per day per hillside dwelling unit) with six dwellings on Elden Way, including the Robinson Estate.

"The influx of 84 cars per day represents a 23% increase in traffic flow on Crescent Drive and 142% increase on Elden Way. As the number of gardeners parking in the Cove Way lot will be less than during Mrs. Robinson's residence, there should be no increase and possibly a decrease, in traffic on that street.

"When the tennis court is converted to parking for 24 cars, there will be a total increase of 172 vehicle trips per day (84 for daytime tours and 88 for special evening events) on an average of one day per month (maximum of twelve events annually). This will represent a 48% increase in traffic flow on Crescent Drive and a 291% increase on Elden Way for one day per month."

13. "... According to the Draft, on-street parking is permitted on both sides of Elden Way and Crescent Drive. The discussion of circulation does not take into account the impact on the traffic and parking needs of local residents if on-street parking is used by visitors to the Robinson Estate."

Section I, C, Description of Project, Public Use, Visitors, has been revised as follows to include a discussion of on-street parking:

"The twice daily tours, 10:00-12:00 and 2:00-4:00, will each be limited to fifty persons and twenty automobiles. With the exception of a maximum of two events annually, . . . all visitors will be required to park on the site."

Please refer to Article 5 of this letter for discussion of anticipated "Special Uses" for the Estate.

14. "... The estimate (increased traffic on Elden Way) appears to be based on tours of the botanical garden and not of the guest cottage for seminars and classes, public visitation by group reservation or public tours of the residence. Other uses would result in increased traffic."

The proposed education programs, tours and maximum number of visitors and vehicles are discussed in Articles 3 and 5 of this letter.

15. "... There would be additional traffic generated by staff personnel, maintenance personnel and construction of the facility."

The above items are discussed in Articles 4, 7 and 9 of this letter.

16. "... As discussed hereinabove in Section F, people will become aware of the Robinson Estate and its nature through various local media and tourist information sources. People may well appear, park on the street and attempt to use the Robinson Estate without reservations.

Such use would result in a substantial increase in traffic in the area and would increase the amount of on-street parking."

As discussed in Article 3 of this letter, advertising of the tours available will be directed toward horticultural/botanical groups; those without reservations will not be permitted entrance to the Estate. Registration as a Point of Historical Interest is discussed in Article 10 of this letter.

17. "... the Draft does not take into account potential future use changes and increased activity, which cannot be ruled out based on any information contained in the Draft."

According to the Department of Arboreta and Botanical Gardens, there are no future use changes anticipated beyond those discussed in the Final EIR.

18. "... Investigation of noise levels in the neighborhood was inadequate and the conclusions of the draft with regard to noise levels are therefore unsubstantiated."

"... The only noise measurements made in reaching the conclusions contained in the Draft were those made in a single survey for a period of twenty minutes between 11:40 a.m. and 12:00 p.m. at a single site at 1003 Elden Way approximately 200 feet south of the entrance gate to the gardens. This survey ignored other locations where sound measurements should have been taken.

"... The survey also ignored the increased noise levels caused by tour operation, maintenance, construction and other activities. Aside from the simple statement that 'Where tours pass close to property lines, the noise levels will be higher but not substantial,' there was no investigation of noise levels in the Robinson Estate vis-a-vis neighboring parcels of property. . .

"... In addition, it should be noted that calculation of ambient noise levels is dependent upon the amount of traffic, since the number of cars and people using the property is probably the largest variable factor in the amount of noise. . ."

In response to the claim that the investigation of the noise levels in the neighborhood was inadequate, noise monitoring was conducted September 5, 1979 near Cove Way and the intersection of Elden Way

and Crescent Drive. Results of the monitoring are attached and are consistent with data obtained during the noise survey of May 16, 1978.

The following has been added to the EIR as the second sentence, third paragraph under Section III, A, 5, Noise:

"This analysis is based on changes in expected noise levels from conditions that existed when Virginia Robinson resided on the premises. The analysis would not be valid if it were based on noise levels associated with an empty or rarely used facility."

The following has been added to Section III, A, 5, Noise, of the EIR:

"The Department of Health Services, on September 5, 1979, conducted a noise survey on the Robinson Estate across the street from 1027 Cove Way and also in front of 1017 Crescent Drive at the intersection of Elden Way. This data is located in Appendix Two.

"The Cove Way monitoring location was on an upper garden walkway, generally east of the gardeners' parking area, facing Cove Way. Noise levels were monitored between 11:00 a.m. and 12:00 noon, a period which is considered to be of sufficient time for results to be statistically valid.

"Major noise sources from Cove Way were approximately fifty automobiles and trucks which passed during the monitoring period. In addition, ambient noise levels were influenced by gardeners operating power equipment on adjacent property.

"The ambient noise levels recorded on Cove Way indicate that the area has a noise quality which is excellent for an urban residential environment (An  $L_{eq}$  of 50.2 dB with a median noise level ( $L_{50}$ ) of 43 dB).

"In assessing the impact of the proposed project on ambient noise levels, one must consider the change in the distribution curve of ambient noise levels caused by noise intrusions. In the case of the Robinson Gardens, the noise impact is evaluated according to the degree of shift in the ambient noise distribution curve caused by the project activities. The degree of change in the ambient noise distribution curve must significantly exceed the amount of expected daily noise fluctuations for a negative noise impact from a proposed project to occur.

"A review of the noise monitoring data for Cove way and Elden Way indicates that increased traffic on these streets, which is related to the subject project, will not significantly change the ambient noise distribution curve. There are several reasons for this conclusion:

- a. The number of employees on the Estate will be less than employed by Mrs. Robinson. This will reduce the number of vehicle trips and associated noise of employees' automobiles.
- b. With the exception of the daily tours, seminars and other events related to the subject project will occur with less frequency than social affairs hosted by Mrs. Robinson.
- c. Traffic noise attributed to the tours will occur Tuesday through Saturday during four approximately one-half hour periods--9:30-10:00 a.m. and 1:30-2:00 p.m. when visitors are arriving for the tours and 12:00-12:30 p.m. and 4:00-4:30 p.m. when visitors are departing after the tours.
- d. The increased traffic for the maximum one-per-month special evening events will be over a short period of time as guest will arrive and depart at approximately the same time; these functions will not significantly change the ambient noise distribution curve; and all parking for these events will be on the Estate.

"Noise impacts generated within the Estate are not expected to be any greater than in the past for the following reasons:

- a. The number of gardeners working and operating power equipment has been reduced.
- b. The tours will be conducted without the use of amplification equipment by one tour guide.
- c. With visitors prohibited from a large portion of the Estates' perimeter (see Figure 3), the distance between the tour groups and neighbors will help attenuate sounds from the Estate.
- d. The irregular topography and vegetation are natural noise damping characteristics of the site."
- e. The future tennis court parking will be used only one day per month and the existing north wall of the court will help attenuate automobile sounds.

The last paragraph under Section III, A, 5, Noise, has been modified to read as follows:

"Construction related to the development of the Robinson Gardens will cause a short term increase in noise levels; this increase will not be noticeable when monitored utilizing accepted techniques."

The following has been added to Section III, A, 5, Noise:

"Any construction associated with the project will be short-term and will reflect the type of minor construction required for adequate maintenance of similar property. The type of construction planned for the facility will not involve equipment which produces excessive noise. Most construction activities planned for the Estate are expected to last only a short time."

Section III, C, Mitigation Measures Proposed to Minimize Significant Effects, Item 2, has been revised to read as follows:

"The Robinson Gardens will be operated on a group reservation system whereby a maximum of two reserved tours lasting approximately 2 hours each will be permitted daily. Traffic generated by each tour will arrive and leave the proposed gardens over a short period of time. Traffic and the corresponding traffic-generated noise will occur Tuesday through Saturday during four approximately one-half hour periods 9:30 to 10:00 a.m. and 1:30 to 2:00 p.m. when visitors are arriving for the tours and 12:00 to 12:30 p.m. and 4:00 to 4:30 p.m. when visitors are departing. During the tours no traffic will be generated by the project. By limiting daily visitation to acceptable levels, these restrictions will prevent parking and circulation problems and help mitigate such problems as privacy loss, precipitated by the change in land use from residential to public open space."

The following has been added to Section III, C, Mitigation Measure Proposed to Minimize Significant Effects:

"The special evening events will not conflict with the daytime tours, will be limited to a maximum of twelve events annually and all parking will be on-site."

"Additional noise associated with the project will be mitigated by the reduction in number of employees from that during Mrs. Robinson's residence, the distance from the tour groups to the neighboring properties since the tours will be prohibited from much of the Estate's perimeter and, except for the tours, the fewer number of social events than during Mrs. Robinson's residence."

001482

The impact of construction is also discussed under Article 7 of this letter.

19. " . . . The Draft does not Sufficiently Discuss and Analyze the Impact of the Proposed Development on the Privacy of Neighbors. . .

"For example, the Draft does not consider the possibility of on-street parking, discussed above. People walking about the neighborhood would have a major impact on privacy in the area."

The following has been added to Section I, C, Description of Project:

"To protect the privacy of the neighbors, the following plants have been located as required along the property lines of the Estate:

Cissus antartica - Evergreen grape.

Cupressocyparis leylandii - Evergreen tree.

Prunus caroliniana - Evergreen shrub.

Myoporum laetum - Evergreen shrub.

"Also, public tours will be prohibited from portions of the Estate to protect the privacy of the neighbors (Figure 3). This will be controlled by the Arboretum's tour guides who will be with visitors at all times."

Limitations on number of visitors, reservations and parking requirements are discussed in Articles 3, 5 and 10 of this letter. Privacy during construction has been discussed in Article 7 of this letter.

20. " . . . The Draft also does not discuss the impact of designation of the Robinson Estate as a historical point of interest, as discussed above. Again, this could have a substantial impact on the privacy of neighbors."

Designation of the Robinson Estate as a point of historical interest is discussed under Article 10 of this letter.

21. " . . . People will be unable to use their backyards in a free manner and, in cases in which there is a swimming pool or other facility located in their yard, their privacy will be substantially affected. Although the Draft suggests that fences be constructed to help mitigate this privacy loss experienced by neighbors, the

Draft fails to consider the aesthetic effect of construction of such fences. Obviously, construction of fences could adversely alter the appearance of the neighborhood and will substantially detract from the appeal of the existing open spaces."

The discussion of solid fences has been deleted from consideration and from Section III, C, Mitigation Measures Proposed to Minimize Significant Effects. As discussed in Article 19 of this letter, plants have been installed by the Department of Arboreta and Botanic Gardens to help protect the privacy of the neighbors and visitors will be prohibited from areas which may interfere with the neighbors' privacy.

22. "... This Draft Does Not Adequately Explore the Visual Effect on the Proposed Development. . . failing to appropriately analyze the visual effect on neighboring pieces of property. It is likely that there will be substantial visual effect on neighboring parcels of property, including visible parked cars, the Tour Guide Assembly Area and Comfort Station, visible widened sidewalks throughout the Robinson Estate, any developmental work which is done on the Robinson Estate and is visible, the employee parking lot shown on the Plot Plan, Figure 3 on Page 8, and the visual impact of people on the Robinson Estate in tour groups or otherwise. In addition, the visual impact of on-street parking is not considered in the Draft."

As may be seen in Figure 3 of the EIR, the visitor's parking area will be thirty to thirty-five feet above and a minimum of eighty feet distance from the closest residence; this change in elevation and distance will help minimize neighbors' views of parked automobiles. New landscaping by the Department of Arboreta and Botanic Gardens will also help reduce the visual impact of parked automobiles. There will be a maximum of seven visitors' automobiles within possible view from neighboring properties (parked on the western edge of the expanded visitor parking area, Figure 3).

The tour guide assembly area, comfort station (deleted), and sidewalks are discussed in Article 6 of this letter. Employee parking, discussed in Article 4 of this letter, will utilize the same facilities used by Mrs. Robinson's staff. Protection of the visual impact of tour groups on neighbors' privacy has been discussed in Articles 19, 21 and 23 of this letter. On-street parking has been discussed in Articles 3, 5 and 13 of this letter.

23. "... There is discussion in the section on Mitigation Measures Proposed to Minimize Significant Effect on Page 29, of construction of solid fences to help mitigate the



Mr. Arthur N. Greenberg

-19-

February 15, 1980

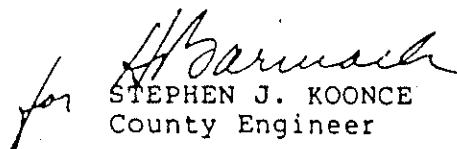
privacy loss experienced by neighbors as a result of the proposed project. However, as set forth herein, construction of such fences would result in substantial negative visual impact on the neighborhood."

Solid fences are no longer proposed.

The referenced paragraph under Section III, C, Mitigation Measures Proposed to Minimize Significant Effects, has been revised as follows:

"Where neighboring uses are extremely close to the property lines, plants have been located to grow on existing fences to help protect the privacy of the neighbors; also, in areas where neighbors' privacy may be impaired, tour groups will be prohibited (see Figure 3). Garden tours can be rerouted or prohibited from other areas in the future if they prove to interfere with neighbors' privacy."

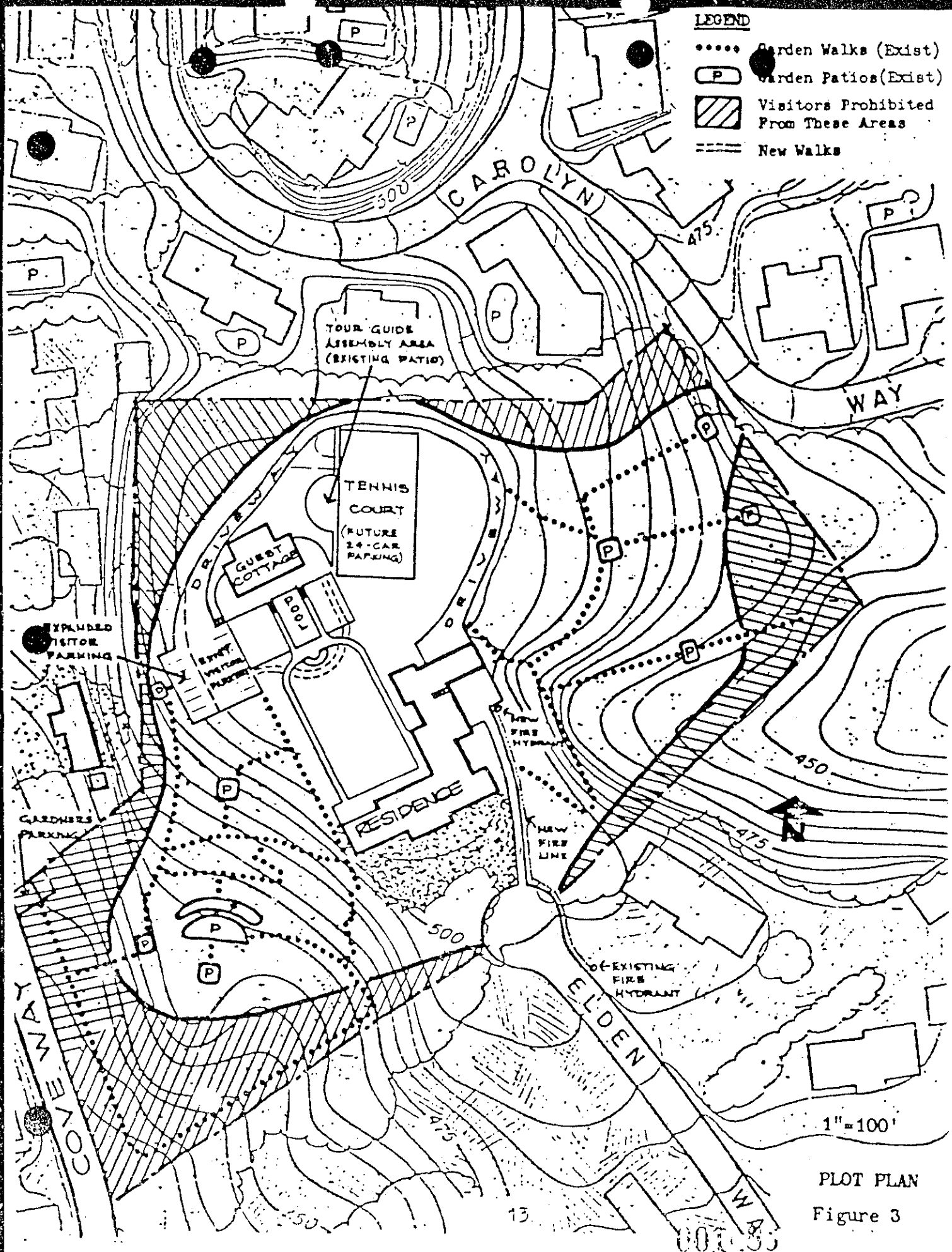
Very truly yours,

*for*   
STEPHEN J. KOONCE  
County Engineer

SJK:mm 22

Attachments (2)

003485



PLOT PLAN  
Figure 3

APPENDIX TWO

NOISE MONITORING DATA

Site Number 1: September 5, 1979

Location: 1008 Elden Drive; upper walkway above animal shed and garage  
across the street from 1027 N. Cove Way

Time: 11:00 - 12:00 a.m.

$L_{eq}$  - 50.2 dB                      LNP - 62.3 dB  
 $L_{90}$  - 40 dB  
 $L_{50}$  - 43 dB  
 $L_{10}$  - 51 dB

Maximum decibel level: 76.1 dB  
Mean decibel level: 44.8 dB

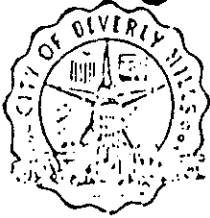
Site Number 2: September 5, 1979

Location: In front of 1017 Crescent Drive at intersection of Elden Way

Time: 1:03 - 1:53 p.m.

$L_{eq}$  - 60.9 dB                      LNP - 81.0 dB  
 $L_{90}$  - 44 dB  
 $L_{50}$  - 55 dB  
 $L_{10}$  - 65 dB

Maximum decibel level: 78.6 dB  
Mean decibel level: 54.9 dB



*City of Beverly Hills*

*450 North Crescent Drive : Beverly Hills, California 90210*

*Joseph N. Tilton*  
*Mayor*

August 28, 1978

Stephen J. Koonce, County Engineer  
Department of County Engineer-Facilities  
County of Los Angeles  
350 South Vermont Avenue  
Los Angeles, Ca. 90020

RE: VIRGINIA ROBINSON GARDENS ARBORETA AND  
BOTANIC GARDENS DRAFT ENVIRONMENTAL  
IMPACT REPORT

Dear Mr. Koonce:

The City of Beverly Hills has reviewed the material in the Draft Environmental Impact Report (EIR) and respectfully submits the following response. Prior to offering the detailed response, however, we would like to share with you the conclusion which evolved from a public forum to which neighborhood residents and County representatives were invited, and which hopefully, will guide your deliberations.

Conclusion

The City notes that the proposed Robinson Arboretum, unlike the other County owned and operated arboreta, is not well located for public access and enjoyment and is a significant intrusion into a residential neighborhood which will have adverse impacts which cannot be mitigated. Therefore, the County should seek alternative means to limit the use of the facility, including use of a reservation system

001488

Stephan J. Koonce, County Engineer  
August 28, 1978  
Page 2

Comments on the Draft EIR

In addition to the following comments, attached are the comments of residents of the City who reviewed the EIR. (EXHIBIT A)

The City of Beverly Hills advises the County of Los Angeles that, based upon the review by staff and the public of the Draft EIR of the Virginia Robinson Gardens Arboretum and Public Gardens prepared by the office of the County Engineer, the City finds that the Draft EIR incompletely addresses the environmental impacts which can be anticipated if a public County facility is developed and operated on a six-acre site which is entirely surrounded by a well-established single-family residential area of the City. The City also calls the County's attention to inaccurate and/or misleading statements made in the EIR. (See attached Table entitled, "Incomplete and/or Inaccurate Statements in Draft EIR and Suggested Revisions," EXHIBIT B, and "Report to Council," EXHIBIT C.)

In addition to the items noted in the Table, major impacts which are either incompletely addressed or on which the EIR is silent may be summarized as follows:

1. Although the EIR considers the noise impacts of traffic on Elden Way (please see additional comments in EXHIBIT A on this), it does not consider the noise impacts on other residential streets surrounding the site, such as Carolyn Way and Cove Way.

It should be noted that the comments included as EXHIBIT A may also be applicable to residents living on other streets in the vicinity.

- a. Noise impacts generated within the site are not considered.

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Stephan J. Koonce, County Engineer  
August 28, 1978  
Page 3

- b. Because of the topographical features of the site which can produce the auditory effect of a small bowl, it is possible for sounds resulting from use of the site by the public to carry and echo effects to occur and be magnified. These sounds would particularly affect Cove Way.
2. Traffic impacts on Elden Way are incompletely considered and the EIR is silent on traffic impacts on neighboring streets such as Carolyn Way and Cove Way. In particular:
- a. The EIR does not address the traffic generated by the users of the seminar building (with an occupancy capacity of 49 persons).
  - b. The EIR does not address traffic generation and other impacts caused by employees and workers connected with the proposed Arboretum.
    - 1) The projected number of employees is not discussed.
    - 2) Plans for employee parking are not discussed. Although a site is indicated on the map for the employee parking lot, no information is offered about the size or adequacy of the lot to serve the projected number of employees within the Park boundaries or how access to the employee parking lot will be effected.
    - 3) There is no discussion of the anticipated hours during which employees will be on the premises, using the parking lot, or travelling to and from the area.

Stephen J. Koonce, County Engineer  
August 28, 1978  
Page 4

- 4) There is no discussion of the visual and noise impact resulting from an employee parking lot located off of Cove Way.
- c. The EIR concedes that the entrance on Elden Way and the access driveway on the property are not sufficiently wide to accommodate tour buses. The EIR does not consider that this entrance and access driveway is not sufficiently wide to accommodate the two-way traffic that could be anticipated from public use of the facility.
3. The EIR does not adequately address the loss of privacy resulting from the topography of the site which permits people within the Arboretum to view downhill towards Cove Way, affecting both the properties adjoining the Arboretum and the properties on the west side of Cove Way. Mitigating measures, such as the construction of a wall, would present an additional adverse visual impact, and would not be an adequate solution to the visual field problem presented by the topography.
4. The EIR does not address the fact that the presence of a public facility in the midst of a residential area is inconsistent with the current General Plan of the City, particularly the Land Use Element in which the City sets as a goal the preservation of the integrity of residential areas.
5. The EIR assumes the property would pass to the heirs. This statement is erroneous and the conclusions drawn are speculative and should not properly be included in the EIR, as discussed in the interoffice memo from the Acting

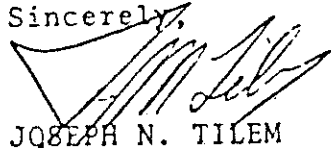
Stephen J. Koonce, County Engineer  
August 28, 1978  
Page 5

City Attorney of the City of Beverly Hills which is part of EXHIBIT C. Any discussion of subdivision of the property is not within the scope of the project and is outside the authority of the County. It is inappropriate to speculate as to what will occur if title to the Robinson property passes to the City. Therefore, discussion of subdivision or any other use of the estate not provided in the Grant Deed should be omitted from the EIR.

6. The EIR does not address the environmental impacts which could result from the declaration of the estate as a California Historical Landmark or a National Register of Historical Places.

In addition to the comments which are summarized in this letter and the EXHIBITS A, B, and C, which were noted previously in the text of the letter, the City offers a list of comments made by some of the residents who have telephoned the City. (EXHIBIT D).

Sincerely,



JOSEPH N. TILEM

JNT:rf

Attachments

cc: John Matzer, Jr., City Manager  
Irwin Moss Kaplan, Planning Director



GREENBERG & GLUSKER  
LAWYERS

ARTHUR N. GREENBERG  
PHILIP GLUSKER  
SIDNEY J. MACHTINGER  
STEPHEN CLAMAN  
AVRON S. GREEN  
HARVEY R. FRIEDMAN  
JON J. CALLO  
PAULA J. PETERS  
MICHAEL A. COLLINS  
JOHN L. CHILD  
BARRY G. WEST  
PHILLIP K. SMITH, JR.  
C. BRUCE LEVINE  
MICHAEL A. GREENE  
MICHAEL S. SHERMAN

HUGH KNOWLTON  
JOSEPH M. CANN  
GARRETT L. HANSEN  
ROBERT L. LAWRENCE  
NORMAN H. LEVINE  
JAMES E. HORNSTEIN  
MARYANNE L. PISANO  
ROBERT S. CHAPMAN  
MAREN C. DALRYMPLE  
MICHAEL S. KLEIN  
MICHAEL I. ADLER  
RUTH M. HOLIMAN  
F. PATRICIA HUDIE  
JOEL D. RUBEN  
CHARLES N. SHEPARD

1900 AVENUE OF THE STARS  
SUITE 2000  
LOS ANGELES, CALIFORNIA 9006

TELEPHONE: (213) 553-3810  
CABLE ADDRESS: GREENLER

August 15, 1978

The Honorable Joseph N. Tilem,  
Mayor and Member of the City  
Council of Beverly Hills  
450 North Crescent Drive  
Beverly Hills, California 90210

Re: The Virginia Robinson Gardens  
Arboreta and Botanic Gardens  
Draft Environmental Impact Report

Honorable Mayor and Members of Council:

We are the attorneys representing the following  
residents of the immediate area of the proposed Virginia  
Robinson Gardens:

Mr. and Mrs. Robert Dickerson  
1003 Elden Way  
Beverly Hills, California 90210

Mrs. Sylvia Eisenberg  
1016 North Crescent Drive  
Beverly Hills, California 90210

Mr. and Mrs. James Fischgrund  
1025 North Crescent Drive  
Beverly Hills, California 90210

Mr. and Mrs. B. Mokhtarian  
1008 Crescent Drive  
Beverly Hills, California 90210

Mr. and Mrs. David H. Rowen  
1005 Elden Way  
Beverly Hills, California 90210

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GREENBERG & GLUSKER

The Honorable Joseph N. Tilem,  
Mayor and Member of the City  
Council of Beverly Hills

-2-

August 15, 1978

Mr. and Mrs. Julian Silverstein  
1001 Crescent Drive  
Beverly Hills, California 90210

Mr. and Mrs. Joseph Sinay  
1004 Elden Way  
Beverly Hills, California 90210

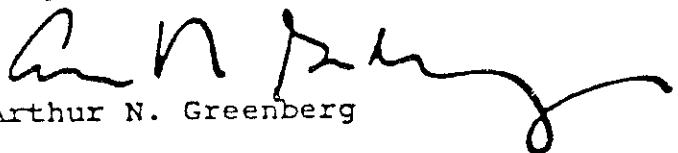
We intend to submit comments regarding the proposed use of the Virginia Robinson Estate to the County Engineer's Office, the agency which promulgated the Draft Environmental Impact Report. Copies of our comments, entitled "Comments on the Adequacy of Draft Environmental Impact Report on the Virginia Robinson Gardens Arboreta and Botanic Gardens," are enclosed herewith.

The deadline for submission of comments to the County Engineer's Office is August 24, 1978. Although we may make minor changes in our comments prior to such date, the enclosed comments are substantially in the form we intend to submit to the County Engineer's Office.

We believe that the proposed use of the Virginia Robinson Estate presents serious problems to the City of Beverly Hills and its residents and we urge you to file appropriate comments on the Draft Environmental Impact Report and/or to join with our clients in our comments.

If you have any suggestions to the enclosed comments, or if we can be of any assistance, please communicate with me.

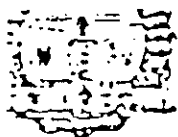
Respectfully,



Arthur N. Greenberg

ANG/ds  
Enclosure

001 01



# COUNCIL AGENDA STATEMENT

Item No.:  
-D-2- D-9  
Meeting Date:  
July 18, 1978

Item Title:

August 11, 1978

Virginia Robinson Gardens Environmental Impact Report (Draft): Proposed Response

Submitted by:

Irwin Moss Kaplan, Planning Director

*CM*  
City Manager Approval

The County Department of Engineer-Facilities has prepared a draft Environmental Impact Report on the proposed Virginia Robinson Gardens in Beverly Hills, for which comments have been requested by July 25.

The draft EIR has been reviewed by the Environmental Review Board and is generally believed to be complete and accurate, with the exception of one potentially significant factor which needs clarification and several points that should be corrected or expanded.

## A. Potentially Significant Issue.

The EIR concludes that the major impact of the proposed project will be the addition of 96 vehicle trips per typical weekday along Elden Way. It appears that this figure includes only those vehicles destined for tours of the garden. If so, it excludes those who would attend seminars and classes which have a posted occupancy capacity of 49 persons or those who may attend tours of the residence. (These activities are discussed on page 7 of the EIR.) Additionally, it is unclear if the 96 figure includes employees, especially since it appears that employees will park in a lot which will have access from Cove Way rather than from Elden Way.

## B. Issues of Less Significance. (See Table, next page.)

The EIR is the first and probably the most important opportunity for the City to make known its feelings to the County regarding the proposed project. The County must adhere to the California Environmental Quality Act (CEQA) regulations and prepare an EIR which includes both an assessment of environmental impacts as well as measures to adequately mitigate all significant adverse impacts or project alternatives which have no significant adverse impacts. According to the City Attorney, the County can not be required to follow City zoning regulations and thus the EIR is the primary opportunity that Beverly Hills has to encourage or discourage retention of the Gardens for the proposed purposes.

If the EIR is accepted as complete and accurate by the Board of Supervisors without adequately addressing Beverly Hills' concerns, the City may wish to take legal action against the County. Although it is not required, the County indicated an interest in conforming with City regulations. In this case, a Conditional Use Permit (CUP) would be required to allow a museum use in an R-1 zone. At that time, there would presumably be public hearings before the Planning Commission and Council on the matter.

001/95

TABLE

## Incomplete or Inaccurate Statements in Draft EIR and Suggested Revisions

Page	Paragraph	Statement Made	Issue	Suggested Revision
2	3	None.	<p>Citation of the proposed retaining wall should be made here. (The wall is described on page 15, paragraph 3.) It would be useful to know the height of the wall, its length and the materials to be used in it.</p>	<p>After sentence 4 in paragraph, add: A retaining wall will be constructed to support this driveway addition which will average _____ feet in height, be about _____ feet long and which will be made of _____ materials.</p>
9	4	The City of Beverly Hills has made a more recent estimate in 1977 of approximately 31,100 persons.	<p>1. The State and County estimated population for the City.</p> <p>2. The most recent State figure is 33,251 (January 1, 1978).</p>	The City of Beverly Hills' population was estimated by the State Department of Finance to be 33,251 on January 1, 1978.
19	2	Major streets in the area are Lexington Road, Benedict Canon Drive, Beverly Drive and Sunset Boulevard.	<p>Officially, except for Sunset Boulevard, and after considerable discussion, the City Council decided to call all of the streets cited "local" streets.</p>	The most heavily traveled streets in the area are Lexington Road, Benedict Canon Drive, Beverly Drive and Sunset Boulevard.
19	4	Benedict Canon and Beverly Drives permit two lanes of travel each direction.	<p>Only one lane of traffic is actually marked on the street and therefore allowed. However, during rush hour, the parking lane is generally used as a second travel lane.</p>	Although the streets are marked for only one lane of travel in each direction, during rush hour Benedict Canon and Coldwater Canon Drives generally carry two lanes of vehicles in each direction.
24	6	Will Rogers Memorial Park, located one-half mile south of the proposed project at Sunset Boulevard and Beverly Drive, is the closest public park.	Coldwater Canon Park is as close, if not closer.	Will Rogers Memorial Park, located at Sunset Boulevard and Beverly Drive, and Coldwater Canon Park, located at Coldwater Canon and Beverly Drives, are each about one-half mile from the site.

At the same time, the City of Beverly Hills and the County would insure the costs of providing services to eleven single-family homes.

Single-family homes in Beverly Hills cost more to sur-vice than is received from them in revenues, especially since the passage of Proposition 13.

At the same time, the City of Beverly Hills and the County would insure the costs of providing services to eleven single-family homes. The cost of providing the services is greater than the revenues received from single-family homes in Beverly Hills.

Neither the County or Beverly Hills has any control over this.

Remove the sentence.

To alleviate this problem bus passengers could be unloaded on the street in front of the Robinson property; but, this would cause an increase in the noise on the street near neighboring uses.

To alleviate this problem bus passengers could be unloaded on the street in front of the Robinson property; but, this would cause an increase in the noise on the street near neighboring uses. In addition, the noises of the buses -- especially on the hilly streets approaching Elden Road -- would cause increased noise levels relative to the projected noises of the autos entering and exiting the site.\*

None.

Parking could be leased or rented as was done in the case of the Harold Lloyd Home tour.

Parking space could be rented, but this would be expensive and could force the County to be unable to operate the estate as a park.\*

Conclusion presumed and may, therefore, be incorrect.

July 5, 1978

EXHIBIT B

Roller's  
ification:

Fund Available

Account Number(s)

City Controller

Supporting Documentation

Agreement		Environmental Review Not Required	X
Resolution		Categorical Exemption - Class:	
Ordinance		Negative Declaration	
Plat		Environmental Document Attached: Draft EIR X	
Other		Originator's Initials	(11)

Staff Recommendation:

Direct staff to send a letter to County advising them of City's concerns.

Board/Commission/Committee Recommendation:

Council Action:

RECEIVE REPORT PUT OVER TO 8-15-78

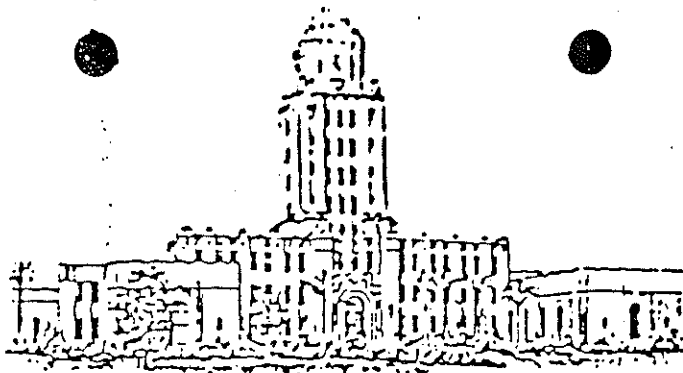
EXHIBIT C

003/98

JEAN M. USHIJIMA  
CITY CLERK

FRANCES M. MALNECK  
DEPUTY CITY CLERK

ROOM 168  
100 NORTH GLENVIEW DR  
(213) 550-4826



CITY OF BEVERLY HILLS  
CALIFORNIA, 90210

August 15, 1978

RESIDENTS CONTACTING CITY HALL ON VIRGINIA ROBINSON EIR MATTER:

<u>Name</u>	<u>Address</u>	<u>Comment</u>
M/M Norman Lee	1025 Cove Way	Against arboretum. Attorney David Com will represent the at forum.
Mrs. Dick Martin	1032 Cove Way	Vehemently oppose. Intrusion on their privacy. Estate's parking areas are just a wall away f their residence. Already too much traffic.
Dr./M. Elmer Rigby	1021 Cove Way	Strongly object to development

*Jean M. Ushijima*  
JEAN M. USHIJIMA  
City Clerk



STEPHEN J. KOONCE  
COUNTY ENGINEER

RAYMOND W. LOOMIS  
Assistant County Engineer

COUNTY OF LOS ANGELES  
DEPARTMENT OF COUNTY ENGINEER-FACILITIES  
550 SOUTH VERMONT, LOS ANGELES, CA 90020

(213) 738 2011

February 15, 1980



BOARD OF SUPERVISORS

PETER F. SCHABARUM  
KENNETH HAHN  
EDMUND D. EDELMAN  
YVONNE BRATHWAITE BURKE  
BAXTER WARD

The Honorable Charles Aronberg, M.D.  
Mayor and Member of City  
Council of Beverly Hills  
450 North Crescent Drive  
Beverly Hills, California 90210

Honorable Mayor and Members of Council:

DRAFT ENVIRONMENTAL IMPACT REPORT  
THE VIRGINIA ROBINSON GARDENS

The Honorable Joseph N. Tilem's letter dated August 28, 1978, contained specific comments regarding his review of the aforementioned project. His comments and our response to those comments are as follows:

1. "... the County should seek alternative means to limit the use of the facility, including use of a reservation system."

The following has been added to Section I, C, Description of Project:

"Information regarding the tours will be directed toward horticultural/ botanical groups; reservations will be made by telephone and confirmed by mail as in the case of the Getty Museum and the UCLA Japanese Gardens."

2. "... Although the EIR considers the noise impacts of traffic on Elden Way . . . it does not consider the noise impacts on other residential streets surrounding the site, such as Carolyn Way and Cove Way.

"Noise impacts generated within the site are not considered.

"Because of the topographical features of the site which can produce the auditory effect of a small bowl, it is possible for sounds resulting from use of the site by the public to carry and echo effects to occur and be magnified. These sounds would particularly affect Cove Way."

0011 00



The following has been added to Section III, A, 5, Noise, of the EIR:

"The Department of Health Services, on September 5, 1979, conducted a noise survey on the Robinson Estate across the street from 1027 Cove Way and also in front of 1017 Crescent Drive at the intersection of Elden Way. This data is located in Appendix Two.

"The Cove Way monitoring location was on an upper garden walkway, generally east of the gardeners' parking area, facing Cove Way. Noise levels were monitored between 11:00 a.m. and 12:00 noon, a period which is considered to be of sufficient time for results to be statistically valid.

"Major noise sources from Cove Way were approximately fifty automobiles and trucks which passed during the monitoring period. In addition, ambient noise levels were influenced by gardeners operating power equipment on adjacent property.

"The ambient noise levels recorded on Cove Way indicate that... the area has a noise quality which is excellent for an urban residential environment (An  $L_{eq}$  of 50.2 dB with a median noise level ( $L_{50}$ ) of 43 dB).

"In assessing the impact of the proposed project on ambient noise levels, one must consider the change in the distribution curve of ambient noise levels caused by noise intrusions. In the case of the Robinson Gardens, the noise impact is evaluated according to the degree of shift in the ambient noise distribution curve caused by the project activities. The degree of change in the ambient noise distribution curve must significantly exceed the amount of expected daily noise fluctuations for negative noise impact from a proposed project to occur.

"A review of the noise monitoring data for Cove way and Elden Way indicates that increased traffic on these streets which is related to the subject project will not significantly change the ambient noise distribution curve. There are several reasons for this conclusion:

- a. The number of employees on the Estate will be less than employed by Mrs. Robinson. This will reduce the number of vehicle trips and associated noise of employees' automobiles.
- b. With the exception of the daily tours, seminars and other events related to the subject project will occur with less frequency than social affairs hosted by Mrs. Robinson.

February 15, 1980

- c. Traffic noise attributed to the tours will occur Tuesday through Saturday during four approximately one-half hour periods--9:30-10:00 a.m. and 1:30-2:00 p.m. when visitors are arriving for the tours and 12:00-12:30 p.m. and 4:00-4:30 p.m. when visitors are departing after the tours.
- d. The increased traffic for the maximum one-per-month special evening events will be over a short period of time as guests will arrive and depart at approximately the same time; these functions will not significantly change the ambient noise distribution curve; and all parking for these events will be on the Estate.

"Noise impacts generated within the Estate are not expected to be any greater than in the past for the following reasons:

- a. The number of gardeners working and operating power equipment has been reduced.
- b. The tours will be conducted without the use of amplification equipment by one tour guide.
- c. With visitors prohibited from a large portion of the Estate's perimeter (see Figure 3), the distance between the tour groups and neighbors will help attenuate sound from the Estate.
- d. The irregular topography and vegetation are natural noise damping characteristics of the site."
- e. The future tennis court parking will be used only one day per month and the existing north wall of the court will help attenuate automobile sounds.

The physics involved with the site will not produce an auditory effect because of the site's damping characteristics, and the relatively low level of noise expected when compared to existing levels.

- 3. "... The EIR does not address the traffic generated by the users of the seminar building (with an occupancy capacity of 49 persons)."

The following has been added to Section I, C, Description of Project:

"The twice daily tours, 10:00-12:00 and 2:00- 4:00, will each be limited to fifty persons and twenty automobiles.

"Classes and seminars may be scheduled periodically in the guest cottage; these will be limited in the same fashion as indicated above. Luncheon meetings may also be scheduled periodically and limited in number to eighty persons; number of vehicles, twenty. These will probably be held on the lawn or patio areas as the guest cottage will have a posted occupancy of forty-nine persons. The residence will also be available for public tours. Public tours and special group tours will not be scheduled in the event a luncheon meeting, class, or seminar is held on a given day."

The fifth paragraph under Section III, A, 3, Circulation, has been revised to read as follows:

"The Robinson Gardens will provide 20 visitor parking spaces and will be open from 10 A.M. to 4 P.M. Tuesday through Saturday. Based on these restrictions and a maximum of two reserved tours a day lasting approximately 2 hours each, traffic flow on Elden Way and Crescent Drive may increase by 80 vehicle trips per day (40 vehicle trips per tour) due to visitors plus 4 vehicle trips due to employees (1 tour guide and 1 part-time custodian) for a total of 84 vehicle trips per day.

"When the tennis court is converted for future parking for 24 cars, the number of vehicle trips will be increased by 88 vehicle trips per day (total of 44 on-site parking spaces) to a total of 172 vehicle trips for the one day per month on which special evening events are held (maximum of twelve annually).

"This compares to the current estimate of traffic flow on Crescent Drive of 181 cars per day in one direction of travel (see Figure 8, Southbound at intersection of Lexington and Crescent) and 59 cars per day on Elden Way based on the August, 1975 City of Los Angeles EIR Guidelines of 9.82 vehicle trips per day per hillside dwelling unit; the City of Beverly Hills has no comparable guidelines."

Section III, B, Significant Environmental Effects Which Cannot Be Avoided If The Project Is Implemented, Article 1, has been revised to read as follows:

"An increase in traffic flow will occur on Elden Way and Crescent Drive. Traffic on these streets will increase by approximately 84 vehicles trips per day between the hours of 10 A.M. and 4 P.M. Tuesday through Saturday. This increase compares with the current estimate of 181 cars per day traveling southbound on Crescent Drive near the Lexington Road intersection. No traffic counts are available for the northbound lane of Crescent Drive north of Lexington Road;

however, they are assumed to be approximately the same as figures for the southbound lane making total traffic flow on Crescent Drive equal to approximately 362 cars per day. Although no existing traffic count is available for Elden Way, it may be assumed to be approximately 59 vehicle trips per day (using the August, 1975 City of Los Angeles EIR Guidelines of 9.82 vehicle trips per day per hillside dwelling unit) with six dwellings on Elden Way, including the Robinson Estate.

"The influx of 84 vehicle trips per day represents a 23% increase in traffic flow on Crescent Drive and 142% increase on Elden Way. As the number of gardeners parking in the Cove Way lot will be less than during Mrs. Robinson's residence, there should be no increase, and possibly a decrease, in traffic on that street.

"When the tennis court is converted to parking for 24 cars, there will be a total increase of 172 vehicle trips per day (84 for daytime tours and 88 for special evening events) on an average of one day per month (maximum of twelve events annually). This will represent a 48% increase in traffic flow on Crescent Drive and a 291% increase on Elden Way for one day per month."

4. "... The EIR does not address traffic generation and other impacts caused by employees and workers connected with the proposed Arboretum.

- 1) The projected number of employees is not discussed.
- 2) Plans for employee parking are not discussed.

Although a site is indicated on the map for the employee parking lot, no information is offered about the size or adequacy of the lot to serve the projected number of employees within the Park boundaries or how access to the employee parking lot will be effected.

- 3) There is no discussion of the anticipated hours during which employees will be on the premises, using the parking lot, or traveling to and from the area.
- 4) There is no discussion of the visual and noise impact resulting from an employee parking lot located off of Cove Way."

The following has been added to Section I, C, Description of Project:

February 15, 1980

"Employees

"The nine employees on the Estate will consist of a caretaker, a part-time custodian, a tour guide and six gardeners; the caretaker will live on the property. The caretaker, custodian (10:00 a.m. to 4:00 p.m.) and tour guide (9:30 a.m. to 4:00 p.m.) will park in the garage of the residence; the gardeners (7:30 a.m. to 3:30 p.m.) will park off Cove Way in the garage and lot used by Mrs. Robinson's gardening staff. There may occasionally be part-time volunteers assisting in tours of the Estate."

The following has been added to Section III, A, 3, Circulation, of the EIR:

"Traffic flow on Cove Way will include a maximum of twelve vehicle trips per day due to the six gardeners who will park in the lot off Cove Way (Figure 3). This same lot was used by Mrs. Robinson's gardeners, who numbered 8-9; therefore, the number of vehicle trips on Cove Way should not be increased above that during Mrs. Robinson's residence."

The garages and adjacent exterior parking area provide adequate space for the gardeners' automobiles to be parked off-street. The visual and noise impact due to the use of Cove Way by the gardeners should be little different from that in previous years.

There should be an overall reduction in noise intrusions from the employee parking lot. This analysis is based on changes in expected noise levels from conditions that existed when Mrs. Robinson resided on the premises. The analysis would not be valid if it were based on noise levels associated with an empty, rarely used facility. Impact analysis must always consider the degree of impact associated with a change in land-use or occupancy.

5. "... The EIR concedes that the entrance on Elden Way and the access driveway on the property are not sufficiently wide to accommodate tour buses. The EIR does not consider that this entrance and access driveway is not sufficiently wide to accommodate the two-way traffic that could be anticipated from public use of the facility."

As stated in Article 3 above, the tours are scheduled at specific times; therefore, visitors will be arriving and departing at the same time, not requiring a two-way driveway. A widening

of the driveway was scheduled, as indicated in Figure 3 of the Draft EIR, but has been deleted from the proposed development to reduce the amount of construction.

6. "... The EIR does not adequately address the loss of privacy resulting from the topography of the site which permits people within the Arboretum to view downhill towards Cove Way, affecting both the properties adjoining the Arboretum and the properties on the west side of Cove Way. Mitigating measures, such as the construction of a wall, would present an additional adverse visual impact, and would not be an adequate solution to the visual field problem presented by the topography."

The following has been added to Section I, C, Description of Project:

"To protect the privacy of the neighbors, the following plants have been located as required along the property lines of the Estate:

*Cissus antartica* - Evergreen grape.

*Cupressocyparis leylandii* - Evergreen tree

*Prunus caroliniana* - Evergreen shrub.

*Myoporum laetum* - Evergreen shrub.

"Also, public tours will be prohibited from portions of the Estate to protect the privacy of the neighbors (Figure 3). This will be controlled by the Arboretum's tour guides who will be with visitors at all times."

Section III, C, Mitigation Measures Proposed to Minimize Significant Effects, fifth paragraph, has been revised to read as follows:

"Where neighboring uses are extremely close to the property lines, plants have been located to grow on existing fences to help protect the privacy of the neighbors; also, in areas where neighbors' privacy may be impaired, tour groups will be prohibited (see Figure 3). Garden tours can be rerouted or prohibited from other areas in the future if they prove to interfere with neighbors' privacy."

"Interference with the neighbors' privacy will also be mitigated by the requirement that a tour guide be with guests at all times on tours of the Estate; guest will not be allowed to tour the grounds unescorted."

The discussion of solid fences has been deleted from consideration and from Section III, C, Mitigation Measures Proposed to Minimize Significant Effects.

7. "... The EIR does not address the fact that the presence of a public facility in the midst of a residential area is inconsistent with the current General Plan of the City, particularly the Land Use Element in which the City sets as a goal the preservation of the integrity of residential areas."

The relation of Beverly Hills General Plan to the development of Virginia Robinson Gardens is discussed in Section I, B, Objectives; the County's only legal obligation is to comply with Government Code Section 65402.

8. "... The EIR assumes the property would pass to the heirs. This statement is erroneous and the conclusions drawn are speculative and should not properly be included in the EIR. . . ."

Although disposition of the property if title passed from the County would be beyond the County's authority, such disposition is properly considered in the EIR under possible alternatives to the proposed project.

9. "... The EIR does not address the environmental impacts which could result from the declaration of the estate as a California Historical Landmark or a National Register of Historical Places."

The following has been added to Section I, C, Description of Project:

"The Robinson Estate was placed on the National Register of Historic Places November 15, 1978, and is registered as a point of historic interest with the notation that access is restricted."

Although discussed in the EIR, this registration was not contingent on the final disposition of the EIR. Such registration will not alter the use of the Robinson Estate as an arboretum or increase the permitted number of visitor or automobiles on the site. Advertising and reservations for tours are discussed in Article 1 of this letter.

February 15, 1980.

The following Articles relate to the City of Beverly Hills Council Agenda Statement of August 11, 1978:

10. "Potentially Significant Issue.

"The EIR concludes that the major impact of the proposed project will be the addition of 96 vehicle trips per typical weekday along Elden Way. It appears that this figure includes only those vehicles destined for tours of the garden. If so, it excludes those who would attend seminars and classes which have a posted occupancy capacity of 49 persons or those who may attend tours of the residence. (These activities are discussed on Page 7 of the EIR). Additionally, it is unclear if the 96 figure included employees, especially since it appears that employees will park in a lot which will have access from Cove Way rather than from Elden Way."

These items are discussed in Article 3 and 4 of this letter.

11. "Page 7, paragraph 3;

"Issue: Citation of the proposed retaining wall should be made here. (The wall is described on Page 15, paragraph 3.) It would be useful to know the height of the wall, its length and the materials to be used in it."

The driveway will not be widened, therefore, the subject retaining wall is unnecessary. Reference to widening of the driveway has been deleted from Page 15, paragraph 3.

12. "Page 9 paragraph 4;

"Statement Made: The City of Beverly Hills has made a more recent estimate in 1977 of approximately 31,100 persons.

"Issue:

1. The State and County estimated population for the City.
2. The most recent State figure is 33,251 (January 1, 1978)."

Subject paragraph has been revised to read as follows:

"The Los Angeles County Department of Regional Planning estimates the population in Beverly Hills (Statistical Area 3.1), as of January 1, 1976, to be approximately 31,825



February 1, 1980

persons. The City of Beverly Hills population was estimated by the State Department of Finance to be 33,251 on January 1, 1978."

13. "Page 19, paragraph 2;

"Statement Made: Major streets in the area are Lexington Road, Benedict Canon Drive, Beverly Drive and Sunset Boulevard.

"Issue: Officially, except for Sunset Boulevard, and after considerable discussion, the City Council decided to call all of the streets cited "local" streets."

The last sentence of subject paragraph has been revised to read as follows:

"The most heavily traveled streets in the area are Lexington Road, Benedict Canon Drive, Beverly Drive and Sunset Boulevard (see Figure 2)."

14. "Page 19, paragraph 4;

"Statement Made: Benedict Canon and Beverly Drives permit two lanes of travel each direction.

"Issue: Only one lane of traffic is actually marked on the street and therefore allowed. However, during rush hour, the parking lane is generally used as a second travel lane."

The last sentence of subject paragraph has been revised to read as follows:

"Although the streets are marked for only one lane of travel in each direction, during rush hour Benedict Canon and Coldwater Canyon Drives generally carry two lanes of vehicles in each direction."

15. "Page 24, paragraph 6;

"Statement Made: Will Rogers Memorial Park, located one-half mile south of the proposed project at Sunset Boulevard and Beverly Drive, is the closest public park.

"Issue: Coldwater Canyon Park is as close, if not closer."

February 15, 1980

Subject paragraph has been revised to read as follows:

"Will Rogers Memorial Park, located one-half mile south of the proposed project at Sunset Boulevard and Beverly Drive, and Coldwater Canyon Park located approximately one-half mile northeasterly at Coldwater Canyon and Beverly Drives, are the closest public parks. The proposed arboretum will not affect these parks in any way."

16. "Page 31, paragraph 5;

"Statement Made: At the same time, the City of Beverly Hills and the County would insure the costs of providing services to eleven single-family homes.

"Issue: Single-family homes in Beverly Hills cost more to service than is received from them in revenues, especially since the passage of Proposition 13."

The following sentence has been added to subject paragraph:

"According to the City of Beverly Hills, the cost of providing the services is greater than the revenues received from single-family homes in Beverly Hills."

17. "Page 32, paragraph 1;

"Statement Made: Neither the County or Beverly Hills has any control over this.

"Issue: Both the County and the City would have the same controls that exist on other single-family parcels."

Subject statement has been deleted from the EIR.

18. "Page 34, paragraph 1;

"Statement Made: To alleviate this problem bus passengers could be unloaded on the street in front of the Robinson property; but, this would cause an increase in the noise on the street near neighboring uses.

"Issue: Buses are considerably noisier than autos."

Subject statement has been deleted from the EIR.

003510

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Section III, D, 3, Alternate Site or Design, has been revised, in part, to read as follows:

"... This alternative deals with the possibility of changing the design of the proposed arboretum in order to reduce environmental impacts. Since automobile traffic entering and leaving the arboretum is a major environmental concern, the possibility of locating the parking away from the site and busing patrons has been considered by the Department of Arboreta and Botanic Gardens.

"Under this alternative the parking lot for the project would be located away from the residential area, either at an existing County facility or at a newly constructed lot. Patrons would then be bused from the lot to the site on a scheduled basis.

"This alternative would drastically reduce the projected increase in vehicle trips on Elden Way and Crescent Drive. Any traffic increase would be limited to arboretum vehicles and buses making the trip between the parking lot and the project site.

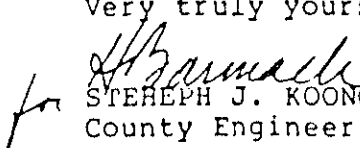
"This alternative is unacceptable to the Department of Arboreta and Botanic Gardens, which does not want to get involved in the logistics and cannot afford the costs of such an operation. In addition, buses cannot negotiate the porte-cochere beneath the servants' quarters, thus requiring all visitors to the Estate to be loaded and unloaded at the sidewalk and causing an increase in noise near neighboring uses; parking is very limited at the nearest County facilities, the West Hollywood Library and Sheriff Station; and the Arboretum cannot afford the purchase and development of remote parking lots."

19. "Page 34, paragraph 3;

"Issue: Parking could be leased or rented as was done in the case of the Harold Lloyd Home tour."

Please refer to Article 18 above.

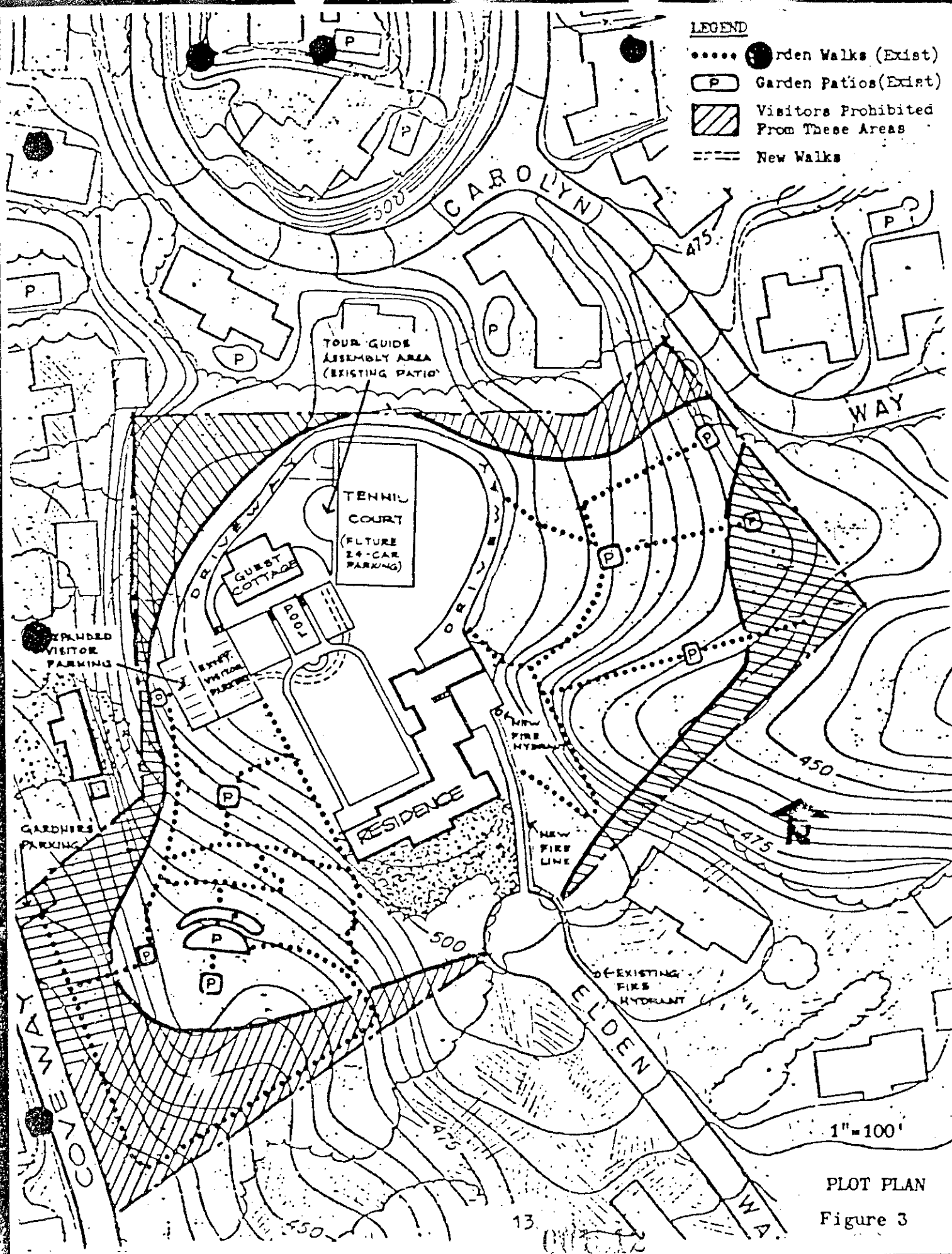
Very truly yours,

*for*   
STEPHEN J. KOONCE  
County Engineer

SJK:mm 22

Attachment

00011



PLOT PLAN  
Figure 3