

FINAL

**Supplemental
Environmental Impact
Report for the Proposed
Operational Changes at the
Virginia Robinson Gardens
SCH #2012091034**

Lead Agency:



County of Los Angeles

**Department of Parks and Recreation
1000 South Fremont Avenue, Unit #40
Building A-9 West, 3rd Floor
Alhambra, CA 91803**

October 2022



ECORP Consulting, Inc.
ENVIRONMENTAL CONSULTANTS

Final Supplemental Environmental Impact Report for the Proposed Operational Changes at the Virginia Robinson Gardens

State Clearinghouse No. 2012091034

Prepared for:



County of Los Angeles Department of Parks and Recreation
1000 S. Fremont Avenue, Unit #40
Building A-9 West, 3rd Floor
Alhambra, CA 91803

Prepared by:



ECORP Consulting, Inc.
ENVIRONMENTAL CONSULTANTS

215 North 5th Street
Redlands, California 92374

October 2022

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1.0 INTRODUCTION

1.1 Final Supplemental Environmental Impact Report Organization

The Draft Supplemental Environmental Impact Report (SEIR) for the Proposed Operational Changes at the Virginia Robinson Gardens Project (Proposed Project) was circulated for public and agency review and comment from July 22, 2022 to September 6, 2022. According to the California Environmental Quality Act (CEQA) Guidelines Section 15132, a Final EIR must be prepared and must include a list of persons, agencies, and organizations commenting on the Draft EIR; copies of the comments received during public review of the Draft EIR; and the Lead Agency's response to those comments.

As required by Section 15132 of the CEQA Guidelines, this Final SEIR responds to comments regarding significant environmental issues and concerns raised in the public and agency review process. This document provides responses to comments on significant environmental issues, describes the disposition of the issues, and explains the Draft SEIR analysis by either supporting Draft SEIR conclusions or providing clarifying information, as appropriate.

This Final SEIR is organized as follows:

- **Section 1** provides a discussion of the purpose of the Final SEIR and discusses the structure of this document;
- **Section 2** lists the agencies, organizations, and individuals that commented on the contents of the Draft SEIR;
- **Section 3** includes the comments received on the Draft SEIR and the responses to those comments, including Master Responses;
- **Section 4** provides revisions to the Draft SEIR (Errata); and
- **Section 5** provides the Mitigation Monitoring and Reporting Program (MMRP) prepared consistent with CEQA requirements.

This Final SEIR incorporates by reference the Draft SEIR and technical appendices. These documents, and other information contained in the environmental record, constitute the Final SEIR for the Proposed Project.

1.2 Summary of Draft Supplemental Environmental Impact Report Comment Period

The Draft SEIR and Notice of Availability (NOA) were distributed for review and comment to a mailing list that included local, regional, and state agencies, stakeholders, and other interested parties for a 46-day public and agency review period from July 22, 2022 to September 6, 2022. A hard copy of the NOA was physically mailed to 80 property owners within 500 feet of the Project Site. The NOA was also filed at the Los Angeles County Clerk, posted at the Project Site, and posted on the County of Los Angeles Department of Parks and Recreation (County's) website at: <https://parks.lacounty.gov/environmental->

[documents/](#). In addition, the NOA was published in the legal notice section of the *Beverly Hills Courier*, the publication of record for Beverly Hills, California, on the following dates:

- Friday, July 15, 2022
- Friday, July 22, 2022
- Friday, September 2, 2022

2.0 LIST OF COMMENTORS

A list of public agencies, organizations, and individuals that provided comments on the Draft SEIR is presented in Table 2-1, below. Each comment letter has been assigned a numerical designation. Each comment within each letter has been assigned an additional numerical designation so that each comment can be cross-referenced with an individual response. These letters, and the responses to the comments, are in Section 3.0 of this Final SEIR. Letter 86 included an exhibit which has been included as Appendix B of this Final SEIR. Letter 139 included an exhibit which has been included as Appendix C of this Final SEIR.

**Table 2-1
List of Comment Letters**

Letter Number	Sender	Date Received
1	Linda Meadows	7/27/22
2	Diana Doyle	7/29/22
3	Jane Rascoff	7/29/22
4	Criss K. Moreno	7/29/22
5	Elissa Rubin	7/29/22
6	Krista Everage	7/29/22
7	Rebecca Spiegel	7/30/22
8	Karen Sisman	7/31/22
9	Lynne Vinkovic	8/1/22
10	Edie Bartnof	8/1/22
11	Evelyn Carlson	8/1/22
12	Angela Cohan	8/1/22
13	Ricki Ring	8/2/22
14	Winston Chappell	8/2/22
15	Clare Wagner	8/2/22
16	Chris Marcus	8/2/22
17	Sandra Harris	8/3/22
18	Betty R. Goldstein	8/4/22
19	Lauren Brokaw	8/4/22
20	Haniyyah Jones	8/4/22
21	Erika Safir	8/4/22
22	Malcolm McNeil	8/6/22
23	Sherry Berk Tedeschi	8/6/22
24	Kathleen Luckard	8/7/22

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Letter Number	Sender	Date Received
25	Richard Rubins	8/8/22
26	Suzanne Hertfelder	8/8/22
27	Elaine Stein	8/8/22
28	Richard Doran	8/8/22
29	Robert Lopez	8/8/22
30	Kevin & Valerie Miller	8/8/22
31	Rose Norton	8/8/22
32	Phil Savenick, President, The Beverly Hills Historical Society	8/9/22
33	Phil Savenick	8/9/22
34	Carter Calhoun	8/9/22
35	Lori Greene Gordon	8/9/22
36	Eliana Sisman	8/10/22
37	Sharon A. Messer	8/11/22
38	Karen Platt	8/14/22
39	Natalie Gordon	8/14/22
40	Suzette Mayes	8/15/22
41	Jenna Mirander	8/15/22
42	Jennifer Robertson	8/15/22
43	Robin Kim	8/15/22
44	Connie Ching	8/15/22
45a	Roxanne Heptner	8/16/22
45a	Roxanne Heptner	8/16/22
45c	Roxanne Heptner	8/16/22
46	Roxanne Heptner	8/17/22
47	Stephen Lee	8/18/22
48	Stacy Klines	8/19/22
49	Mark Tapio Kines	8/19/22
50	Laura Haddad	8/19/22
51	Regina Drucker	8/19/22
52	Lewis Perkins	8/19/22
53	Worthy McCartney	8/20/22
54	Bryan and Wendy Turner	8/20/22
55	Melody Kulp Reinstein	8/22/22

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Letter Number	Sender	Date Received
56	David C. Reinstein	8/22/22
57	Patricia A. Reinstein	8/22/22
58	Amanda and Josh Van Dyk	8/22/22
59	Gary Gartsman	8/22/22
60	Fred M. Reinstein	8/22/22
61	Jaice Ambry Jerde	8/22/22
62	Betsy Bosak	8/22/22
63	Suzanne Kayne	8/22/22
64	Adrienne Horwitch	8/22/22
65	Jeff Graham	8/22/22
66	Jayne Papac Wilson	8/22/22
67	Seeta Zieger	8/22/22
68	Robert Sakatani	8/22/22
69	Kerstin and George Royce	8/22/22
70	Robin Blake	8/22/22
71	Jodi and Don Stine	8/22/22
72	Lynn Whitaker	8/23/22
73	Laurie K. Hartigan	8/23/22
74	Elva Yañez - Prevention Institute	8/24/22
75	Kathleen Spiegelman	8/25/22
76	Charles Alpert	8/25/22
77	Charles Alpert	8/29/22
78	Vera and Paul Guerin	8/30/22
79	Alice Gardello	8/30/22
80	Susan Landay	8/30/22
81	Francisco Romero - Park Equity Alliance	8/31/22
82	Charles Alpert	8/31/22
83	Janice Chung	9/1/22
84	Dar Mahboubi and Family	9/1/22
85	Maralee Beck	9/1/22
86	Jamie R. Wolf	9/2/22
87	Emina Darakjy	9/2/22
88	Tim Lindsay	9/2/22

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Letter Number	Sender	Date Received
89	Charles Alpert	9/2/22
90a	Debbie Weiss	9/2/22
90b	Debbie Weiss	9/2/22
91	Liz Kim	9/2/22
92	Kathy and Al Checchi, Roxanne Heptner, Jodi and Don Stine, Michael and Michelle Weiner, Michael McAlister	9/4/22
93	Sally Harkham	9/4/22
94	Patricia & Armin Wittenberg	9/4/22
95	Kathy Checchi & Michael McAllister	9/4/22
96	Donna Ko	9/4/22
97	Lisa and Russell Stuart	9/5/22
98	Ian Fried	9/5/22
99	Meredith Fried	9/5/22
100	Adam Checchi	9/5/22
101	Robin Kim	9/5/22
102	Kyrstin Munson	9/5/22
103	Scott Messer	9/5/22
104	Marguerite Lindsay	9/5/22
105	Judson Mock	9/5/22
106	Kathy and Al Checchi, Michael McAlister, Jennifer and Randy Wooster, Joseph Akhtarzad, Bobby Kotick	9/6/22
107	Rosario Maquiddang	9/6/22
108	Michael & Michele Wiener	9/6/22
109a	Antony Spencer	9/6/22
109b	Antony Spencer	9/6/22
109c	Antony Spencer	9/6/22
110	Charles Alpert	9/6/22
111	Kathy Checchi	9/6/22
112	Lesbia M Trabanino	9/6/22
113	Ernesto H Plaganas	9/6/22
114	Guity and Soly Melamed	9/6/22
115a	Janice Moreno	9/6/22
115b	Janice Moreno	9/6/22

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Letter Number	Sender	Date Received
116	Barry Todd	9/6/22
117	Scott Ewasko	9/6/22
118	Scott Ewasko	9/6/22
119	Scott Ewasko	9/6/22
120	Isaac Moradi	9/6/22
121	Jacquiline Moradi	9/6/22
122	Roxanne Heptner	9/6/22
123	Shahrzad Shamsi	9/6/22
124	Radi Shamsi	9/6/22
125	Mehdi Bolour	9/6/22
126	Mehdi Bolour	9/6/22
127	Elena and Jack Rochel	9/6/22
128	Sheryl Lynn Haymon	9/6/22
129	Saul Berman	9/6/22
130	Shahnaz Nassir	9/6/22
131	Victor Felix	9/6/22
132	Sandra Goldfarb	9/6/22
133	Kym Pereira	9/6/22
134	Kym Pereira	9/6/22
135	Sabrena Russell	9/6/22
136	Bella Bernard	9/6/22
137	Kathy Checchi and Masud Hakim	9/6/22
138	Sam Hakim	9/6/22
139	Ryan Gohlich, City of Beverly Hills	9/6/22
140	Kristin Chandna	9/6/22
141	Pedro Andrade	9/6/22
142	Roya Akhavan, Jasmin Akaks, Afsaneh Akhavan, Daniel Rafalian, Kevin Rafalian and Celine Rafalian	9/6/22
143	Roya Akhavan, Jasmin Akaks, Afsaneh Akhavan, Daniel Rafalian, Kevin Rafalian and Celine Rafalian	9/6/22
144	Roya Akhavan, Jasmin Akaks, Afsaneh Akhavan, Daniel Rafalian, Kevin Rafalian and Celine Rafalian	9/6/22
145	Roya Akhavan, Jasmin Akaks, Afsaneh Akhavan, Daniel Rafalian, Kevin Rafalian and Celine Rafalia	9/6/22

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Letter Number	Sender	Date Received
146	Roya Akhavan, Jasmin Akaks, Afsaneh Akhavan, Daniel Rafalian, Kevin Rafalian and Celine Rafalian	9/6/22
147	Charles Alpert	9/6/22
148	Tobi Lippman	9/6/22
149	Nam Kim	9/7/22

3.0 RESPONSES TO COMMENTS

3.1 Master Responses to Common Comments

A number of the comments received on the Draft SEIR discussed the same issues or environmental concerns. Rather than repeat responses, master responses to common issues were prepared. These master responses are provided below.

Master Response 1: Neighborhood Traffic Congestion

The County acknowledges that at times, visitors to the Gardens may use nearby neighborhood streets for parking. Parking at the Gardens is currently limited to 35 spaces on-site and walk-in access with some exceptions for oversized delivery vehicles and tour buses. The Proposed Project does not include new changes to the physical environment related to parking, such as construction of new parking on- or off-site. To offset congestion on neighborhood streets, the County proposes to encourage visitors to use public transportation services and rideshare services on its website and in promotional materials such as brochures about VRG. The Proposed Project does not include new physical signage, markings, or other parking-related changes. The proposed activity is a promotional or informational approach to encourage outside transportation services with the intent of reducing vehicle activity on and near the Project Site. Furthermore, reservations will continue to be required for daily visitors, which limits the number of patrons allowed at the same time, therefore mitigating an overflow or capacity issue within the Gardens.

Special Use Events would continue to comply with City of Beverly Hills ordinances, and valet service must obtain City parking permits for use of public streets to avoid overlapping events with surrounding neighbors. The current requirement of an event-specific traffic and parking plan would remain. Parking associated with the Gardens is not currently allowed and will not be allowed on Elden Way. These measures are in place now with current Special Use Events that occur at the Gardens. With the expanded number of Special Use Events, these measures would continue to be used, minimizing the temporary effects of these events on area traffic patterns and on-street parking occupancy.

Master Response 2: Parking for Daily Tours and Smaller Events

Parking on the property will remain the same at 35 spaces and there will continue to be no parking on Elden Way. Onsite parking is reserved when visitors make reservations for a tour. Smaller events can accommodate up to 35 cars with stacked parking. Gardens staff park their cars in the parking lot off the entrance at 1028 Cove Way. There are eight spaces available for staff parking. Occasionally, staff use the upper parking lot when there are no tours scheduled for the day. Figure 2-3. Virginia Robinson Gardens Parking Map has been added to the Draft SEIR. Please see Section 4.0 *Revisions to the Draft SEIR*.

Master Response 3: Parking for Special Use Events

Special Use Event parking management is based on the total number of guests expected. The following good neighbor policies are practiced when the parking for Special Use Events exceeds available parking onsite:

- A parking/transportation plan is developed to use either valet or shuttle vans to bring guests to the Gardens from off-site parking areas and parking permits are requested from the City of Beverly Hills.
- A Special Use Event must apply for and receive a Special Event Permit from the City of Beverly Hills. The valet company used for the event must also apply for and receive a Valet Permit and a Street Parking Permit from the City of Beverly Hills.
- Vendors and staff for Special Use Events are required to park at a designated site and are shuttled to the Gardens. For example, for the annual Garden Tour, all vendor cars park at Greystone Mansion and Park located at 905 Loma Vista Drive, Beverly Hills, CA 90210, approximately 1.5 miles from the Gardens. Vendors may also park in the Cove Way parking lot and walk up the back way through the property.
- Deliveries are scheduled by time and vehicle size. Vehicles that do not fit down the driveway are not permitted to off-load on Elden Way and must use other streets for off-loading.
- The Gardens has preferred rental companies that know the property and the physical site restrictions and therefore use smaller trucks to bring rentals for event set-up.
- Sensitivity to the effect on the neighbors and the protection of the artifacts on the property itself are carefully considered when planning each event.
- All City of Beverly Hills ordinances for parking and time limits for events are adhered to for each event.
- Parking monitors are in place at the front gate during the load in and load out for each event to ensure compliance by participants.
- Prior to each Special Use Event, the event operator and Gardens staff coordinate with the Parks Bureau of the Los Angeles County Sheriff's Department in its preparation and implementation of an Operations Plan for police protection services to be provided by the County to supplement the private security being provided by the event operator.
- There are cameras and video surveillance monitors throughout the property.

Master Response 4: Noise

A site-specific noise impact assessment was prepared for the Proposed Project, which is included as Appendix E of the Draft SEIR. In order to quantify existing ambient noise levels on the Project Site, a 90-hour (3.75 days) noise measurement was conducted starting on Friday, February 11, 2022, extending into Tuesday, February 15, 2022. The noise measurement is representative of the typical existing noise experienced within the Project Site during both weekend and weekdays.

To model onsite noise as a result of Special Use Event activities (i.e., amplified sound and crowd noise), ECORP utilized the SoundPLAN 3D noise model to predict noise propagation from a noise source based

on the location, noise level, and frequency spectra of the noise sources as well as the geometry and reflective properties of the local terrain, buildings, and barriers (see Appendix E of the Draft SEIR).

The main source of noise at Special Use Events would be produced from amplified sound systems; however, it is noted that not all Special Use Events would have amplified music. Noise levels from amplified sound systems vary considerably and depend upon the size of the area intended to be served, the crowd size, and the nature of the amplified sound (e.g., music versus voice announcements). To account for this variation, three separate SoundPLAN modeling calculations were conducted: no amplified music and crowd noise, moderate intensity amplified music (*acoustical instruments with pickup amplifiers*), and high intensity amplified music (*electrified, high energy, and fast tempo*). Additionally, all modeling calculations include a volume attenuation area directly east of the main house and event lawn to account for the dense foliage in the area.

Modeled sound levels in the Project vicinity at the nearby residential properties as a result of Special Use Event scenarios described above are included in Table 3.14-8 of the Draft SEIR. Additionally, noise contour graphics (Figures 3-2 through 3-4 of the Draft SEIR) were prepared to depict the predicted noise levels in the Project vicinity. It is noted that Project noise modeling represents a worst-case scenario in which all potential Project noise sources are being generated at full intensity at the same moment. Therefore, it is not predicted that noise levels of Special Use Event activities would reach the levels depicted in Table 3.14-8 of the Draft SEIR.

As described in *Section 3.14 Noise* of the Draft SEIR, noise generated as a result of Special Use Events occurring on the Project Site would be similar to existing conditions. Although weddings would be allowed at the Gardens, the noise from these events would be similar to what currently occurs during Special Use Events. Put differently, the three Special Use Event scenarios analyzed in Table 3.14-8 of the Draft SEIR are currently allowed and occur at the Project Site under current conditions. The level of noise produced during an individual Special Use Event is not proposed to change. Therefore, noise generated at the Project Site during a Special Use Event with implementation of the Proposed Project would be similar to what could currently occur. However, the maximum number of Special Use Events would increase under the Proposed Project from four events to 24 events annually. It is noted that the City's regulations with respect to noise (Title 5, Chapter 1, *Noise Regulations*, of the City's Municipal Code) state that it is prohibited for any person within any residential zone of the City to use or operate any sound amplifying equipment between the hours of 10:00 p.m. and 8:00 a.m. to be distinctly audible at or beyond the property line of the property on which the equipment is located. Therefore, the Project's noise-related effects associated with the increase in the frequency of Special Use Events would continue to be limited to the less noise-sensitive daytime hours.

Master Response 5: Special Use Event Noise Mitigation

The County has included a mitigation measure in the Draft SEIR to reduce noise impacts from Special Use Events with amplified music. As identified in Table 3.14-8 of the Draft SEIR, Special Use Event onsite noise would reach levels up to 62.9 dBA L_{eq} with crowd noise and moderate intensity amplified music. Noise levels would reach up to 72.1 dBA L_{eq} with crowd noise and high intensity amplified music at the nearby residential land uses. As a result, Mitigation Measure NOI-1 is required to reduce onsite noise levels

during Special Use Events with amplified music. Mitigation Measure NOI-1 would require that all property owners and occupants located within 500 feet of the Gardens' boundary be sent a notice at least five (5) days prior to commencement of all Special Use Events employing the use of amplified sound.

Additionally, Mitigation Measure NOI-1 would reduce onsite Project noise by mandating that the sound amplification system at Special Use Events include a processor to control the maximum output of the speakers. All resulting noise emitted through speakers would be controlled to the maximum allowable level (80 dBA L_{max}) as measured at one meter (3.28 feet) from the source. L_{max} is the maximum noise level during the measurement period. Thus, limiting the maximum noise level output of all Special Use Event amplification systems to 80 dBA L_{max} as measured at one meter ensures the noise generated onsite attenuates to compatible levels at the surrounding residences during Special Use Events (stationary source sound levels decrease (attenuates) at a rate of approximately 6 dB for each doubling of distance from the stationary source).

The Proposed Project would result in an increase in the number of days that Special Use Event noise is generated at the Project Site but would not increase the noise levels of these Special Use Events beyond current conditions. Indeed, with the introduction of Mitigation Measure NOI-1, which is not currently a requirement for Special Use Events at the Project Site, Special Use Events under the Proposed Project could result in less noise intensity than a similar Special Use Event under current conditions. Therefore, noise generated at the Project Site during a Special Use Event with implementation of the Proposed Project would be generally the same as what could occur during a Special Use Event currently.

The modeled Special Use Event noise, coupled with Mitigation Measure NOI-1, the limit to hours specified by City ordinance, and the fact that special events do not span an entire day, means that the expected noise impacts are not excessive. The Proposed Project's contribution of stationary-sourced noise would result in a less than significant impact with mitigation.

Master Response 6: Emergency Access

Although more Special Use Events would be allowed to occur at the Gardens throughout the year (an increase of up to 20 additional Special Use Events per year), attendance numbers for each event would be generally the same as under existing conditions. The Proposed Project would comply with all applicable City codes and regulations pertaining to emergency response and evacuation plans maintained by the police and fire departments in the City of Beverly Hills. The County would coordinate with the Gardens staff and City of Beverly Hills to expedite evacuation in the event of a wildfire or other emergency event. An advanced reservation is required for parking to ensure that all visitors are able to park on site and evacuate promptly when needed. Visitors are not permitted to park on Elden Way. The Proposed Project would not include street closures and would not change the traffic flow or access to the Project Site, which could impede emergency evacuation. Additionally, Special Use Events would require a traffic plan for each event, which would ensure that roadways would not be blocked for emergency access or evacuation.

Furthermore, the Project Site and the Proposed Project would meet all applicable regulations related to fire safety. The Gardens' existing main entrance on Elden Way would serve as the primary emergency ingress and egress in the event of an emergency, however pedestrian access to and from the Project Site

is available from both Elden Way and Cove Way. The Project does not propose to modify existing access or circulation such that fire and police access would be adversely affected.

Master Response 7: Fire Safety

The County recognizes that the Project Site is located within a Very High Fire Hazard Severity Zone as determined by the California Department of Forestry and Fire Protection. Although the Proposed Project would increase the number of visitors to the site weekly and annually, the risk to each visitor due to wildland fires would not change as a result of the Proposed Project. The Project Site and the Proposed Project would meet all applicable regulations related to fire safety. It should be noted that Section 11(e) of the 1992 Operating Agreement prohibits explosive and hazardous materials on the premises.

The Proposed Project would not introduce a new use into a wildland fire zone and would not increase the maximum number of people at the Project Site at any given time, as reservations would still be required for visitors to attend daily tours and Special Use Events. Furthermore, Special Use Events would require a traffic plan for each event, which would ensure that roadways would not be blocked for emergency access or evacuation.

Master Response 8: Amendments to the Donor Agreement

The allowable land use at the Project Site was changed from single-family residential to public open space and garden in 1980, thereby allowing the existing and proposed uses. By way of discretionary action, the Los Angeles County Board of Supervisors will authorize the Director of the Department of Parks and Recreation to enter into and amended Support Agreement with the Friends of Robinson Gardens to reflect the operational changes approved by the Board. Formally, this amendment would consist of revising Section 4.05 of the Agreement to reflect the proposed changes to the operation of Virginia Robinson Gardens approved by the Board of Supervisors.

The Proposed Project would amend the existing operational hours and days of the Project Site that were established in the 1980 EIR and modified in the 2014 SEIR (although not the land uses regulations); the Proposed Project would be consistent with the land use regulations and policies for the Project Site. The changes are consistent with the existing uses of the Project Site, as they are effectively an expansion of the existing uses, thereby not introducing new uses on site. As such, the Proposed Project would maintain the consistency of the existing uses of the Project Site, and would not conflict, with the existing City of Beverly Hills land use plans and regulations. The continued operation of the property as a public garden in collaboration and coordination with the Friends of Robinson Gardens supports the County's mission and helps to implement the County's Strategic Plan by improving the quality of life for Los Angeles County residents, including families and children, who are currently unable to visit the gardens due to limited hours and days of operation.

Further, the Proposed Project supports the Los Angeles County Department of Parks and Recreation's mission to "serve as stewards of parklands, build healthy and resilient communities, and advance social equity and cohesion" by expanding public access to the gardens and enabling more Los Angeles County residents to enjoy the gardens and experience the multiple benefits it offers. The Proposed Project is

consistent with the County's Strategic Plan and supports the overall County mission to "establish superior services through inter-Departmental and cross-sector collaboration that measurably improves the quality of life for the people and communities of Los Angeles County." The Proposed Project also implements the following strategy in the Strategic Plan: "Expand access for all County residents, particularly those in unincorporated and high-needs areas, who have traditionally underutilized the County's museums, theatres, beaches, parks, and other recreational facilities."

Master Response 9: Commercialization

The rental of public parks and facilities is not unique to the Gardens, as many public facilities in the City of Beverly Hills and County of Los Angeles are available for private rental. The Proposed Project does not permit the use of the Gardens for the sale or marketing of goods or services for profit or any other industrial or commercial uses. The revenue from rentals would be used at the Gardens to supplement the costs to operate and maintain the property. The proposed increase in the number of Special Use Events would improve the fundraising that supports the educational programs and maintenance of the Gardens. Private event rental is a vital means for raising funds to sustain the operations of facilities like the Virginia Robinson Gardens and lessens the tax-payer burden. Renting for private events is a normal operation and legal under the 501(c)(3) charitable tax designation, does not change a venue's tax status, and reflects the values of Virginia Robinson's bequeathment.

Master Response 10: Increase Public Access

The mission of Virginia Robinson Gardens is "to preserve and promote this historically significant first estate of Beverly Hills for the education and enjoyment of the general public." By expanding weekday hours and being open on Sundays, the County is able to better provide for the enjoyment of the property by the general public. Mrs. Virginia Robinson's bequeathment of the Gardens expressed her desire that the Gardens be "...perpetuated as an arboretum or botanic garden for the benefit of the general public ..."

It is currently difficult for the general public to visit the Garden due to the restricted hours and days of operation. It is especially difficult for families, who are not available to visit during current weekday hours due to conflicts with school- and work-hours. The proposed expansions to operating days promote both the letter and intent of Mrs. Robinson in dedicating the property to the "benefit and enjoyment of the general public." The goal of the Proposed Project is to make the Gardens more accessible while simultaneously being a good neighbor to both the City of Beverly Hills and those residents on Elden Way.

The Grant Deed specified that the property "...shall at all reasonable times be open and available for the benefit and enjoyment of the general public as an arboretum garden." The existing operating hours of 6.5 hours for six days a week (Monday through Saturday), are more limited than other County parks and gardens. The Proposed Project proposes to increase the hours and days of operation to ensure that the general public has adequate and reasonable access to enjoy and experience the Garden consistent with the generosity and guidance of Mrs. Robinson.

Existing conditions create several barriers to effective public access: first, working adults are hindered by the limited hours (presently 6.5 hours per day and weekday closing time of 4:00 p.m.), which conflict with

traditional working hours, and limited weekend days (presently closed on Sundays); second, school-aged children and families are unable to visit the property as many have working parents and after-school activities conflict with the early weekday closing time. The increased operational hours would allow the Gardens to develop and offer an afterschool program for children. This would also mean that families would be able to visit the Gardens after school, in the afternoon, and late in the afternoon after work, daylight permitting. Harboring education and a passion for gardening and horticulture is a crucial mission of the Gardens and the bequest of Mrs. Robinson.

Master Response 11: Recirculation of the Draft SEIR

Section 15088.5 of the CEQA Guidelines provides the criteria for recirculation of an EIR prior to certification. A Lead Agency must recirculate an EIR when significant new information is added to an EIR after public notice is given of the availability of the Draft EIR for public review, but before circulation. New information is not "significant" just because it is new. Section 15088.5 defines "significant new information" as information showing that:

- 1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- 2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- 3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
- 4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

Recirculation is not required where the new information added to the EIR merely clarifies or makes insignificant modifications in an adequate EIR. The additional information provided in Section 3.0, Responses to Comments, of this Final SEIR does not meet any of the above criteria for recirculation. The responses to comments provide information that supplements and elaborates on the analysis in the Draft SEIR. However, this new analysis did not reveal any new significant environmental impacts or a substantial increase in the severity of any previously identified environmental impact. Additionally, no project alternatives or mitigation measures that were considerably different from those previously analyzed in the Draft PEIR, and that would also clearly lessen the Proposed Project's environmental impacts, were proposed in the comments. Therefore, the EIR does not need to be updated and recirculation is not required.

3.2 Responses to Individual Letters

This section includes the letters received during the public and agency review period on the Draft SEIR, followed by responses to the comments in the letters. Revisions to the Draft SEIR are included in Section 4.0 of this Final SEIR. The responses are organized as listed in Table 2-1.

Letter 1 - Linda Meadows - July 27, 2022

From: lindahmeadows@gmail.com
Sent: Wednesday, July 27, 2022 5:28 PM
To: Jui Ing Chien
Cc: lindahmeadows@gmail.com
Subject: Please increase hours of public access to the Virginia Robinson Gardens

CAUTION: External Email. Proceed Responsibly.

Dear Jui Ing Chien,

I have been a member of the Friends of Robinson Gardens since 2006 and a board member for the last several years. I am the editor of the VRG eNewsletter, the Happenings. I have always found Robinson Gardens to be a wondrous, beautiful estate. The minute you enter the grounds, you feel the serenity and the fabulous magic of the place which is a much-needed sanctuary in our hectic world. It is important to conserve and restore the beauty of this hidden gem and its historic gardens and homes. Children who come to this garden always learn much about nature, science, and healthy eating. Some children even called it a life-changing experience. The Friends' education programs are also very enriching and unique. Our fabulous annual Garden Tour inspires all who attend and allows our local talented florists, interior designers, and landscape designers showcase their talents for the community.

1-1

The ladies I have worked with are all extraordinary, gifted, and kind women who are passionate about the gardens and how they can enrich the lives of children and adults alike. I think VRG is a unique and extraordinary place of beauty, splendor, and serenity that is well cared for by its very capable board, staff, and special Superintendent Diane Sipos. It is important to safeguard our cultural heritage. It is worthy of support by our community and to increase the hours of public access for such a special and inspiring sanctuary.

Respectfully,
Linda Meadows

Responses to Letter 1 – Linda Meadows

Response to Comment 1-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 2 - Diane Doyle - July 29, 2022

From: dpdoyle123@aol.com
Sent: Friday, July 29, 2022 11:17 AM
To: Jui Ing Chien
Subject: Robinson Gardens, Beverly Hills

CAUTION: External Email. Proceed Responsibly.

Dear Mr. Chien,

The public is so fortunate to be able to access the estate of Robinson Gardens. It would be wonderful if more people could share this delight including families, school children and working people. We all appreciate this treasure!! I am a member of the Friends of Robinson Gards and enjoy the fundraising to better care for the gardens as well as restore this museum. To the extent that we can raise more money, that decreases the dependence on the taxpayers money. The house is so amazing and as a museum represents much of the history of the museum/house. What lucky people we are to be able to use the facility, a privilege that should be shared by all!

2-1

Sincerely,

Diana Doyle

Fellows supporter of the Friends of Robinson Gardens

Responses to Letter 2 – Diane Doyle

Response to Comment 2-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 3 - Jane Rascoff - July 29, 2022

From: Jane Rascoff <janerascoff@gmail.com>
Sent: Friday, July 29, 2022 11:21 AM
To: Jui Ing Chien
Subject: Robinson Gardens

CAUTION: External Email. Proceed Responsibly.

Dear Ms Chien

I'm writing to share with you the excitement and joy that I get from students on my Docent tour at Robinson Gardens. The excitement they have when they look at an object we've taken from the garden to observe under a microscope. The happiness when they meet our chickens and eat some lettuce from our garden!

The smiles from just inhaling the smell of different flowers. The excitement of seeing lemons and oranges on a tree!

Looking at leaves with the binoculars hanging around their neck, and watching the mosquito fish and frogs.

Then being given their own cardboard pot to plant a seed that they take home to water and watch grow!

Please help us continue to enjoy these students as much as they enjoy VRG!

Thanks for listening

Jane Rascoff

1 Century Dr

LA 90067

Sent from my iPhone

3-1

Responses to Letter 3 – Jane Rascoff

Response to Comment 3-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 4 - Criss Sudar - July 29, 2022

From: Sudar, Criss <cks1880@lausd.net>
Sent: Friday, July 29, 2022 1:31 PM
To: Jui Ing Chien
Subject: Robinson Gardens

CAUTION: External Email. Proceed Responsibly.

Dear Honorable Board of Supervisors:

I am writing in support of the modification of the hours, days and special use events at Virginia Robinson Gardens because they will:

- 1) Allow the Gardens to better serve the community and its mission
- 2) Be open on days when families, school children and working people may attend together.
- 3) Increase the fundraising ability of the Friends of Robinson Gardens so that less taxpayer dollars are needed.
- 4) Preserve and share important historical/museum aspects for presenting area's history
- 5) Promote a historical treasure on the National and local landmark registries
- 6) Enable our renowned Children's Science Program & tours for local & Title One school children to be better served

On a personal note, I must tell you of the positive impact Robinson gardens has had on the students I teach in Watts. 112th Street STEAM Academy is a 100% TITLE I school, with a demographic breakdown of 70% Hispanic and 30% African American. The students of 112th Street STEAM Academy are all residents of Watts, in South-Central Los Angeles. Their neighborhoods are economically challenged and incredibly violent, often marked by gang activity and drug abuse. Many students come from single-parent homes or live with a grandparent or other relative. As educators, we see the impact of generational poverty on many of our students; the constant presence of hopelessness that their lives mirror that of their parents, grandparents and great grandparents. Without hope and the belief that life can be better, the motivation and energy needed to break the cycle is very low.

Robinson Gardens has over the years provided on-site trips for 4th grade students to explore a world they have never seen before. The visit is tied to the Next Generation Science Standards (NGSS) and allows students an opportunity to interact in the natural world in a way we cannot do in the classroom. Many of our students are students with learning disabilities who struggle with traditional pen and paper learning activities. This trip makes the learning real and relevant to them in a way that nothing else can. They can see and touch and discuss what they are experiencing in real-time, and this has made a lasting impression on them.

However, trips had to stop during the Pandemic, but the amazing team at Robinson Gardens, stepped up and created some amazing curriculum to allow students to still explore these NGSS standards with activities and materials that they not only created, but supplied to each and every 4th grade student for the last two years. The materials are so authentic and engaging, that I plan on using them in the upcoming school year, to further the understanding for students of how plants play such a vital role in their lives.

Please, consider the request of the Robinson Gardens to expand their hours and other requests and allow them to continue their mission to offer the gardens to the people of Los Angeles and especially the students of our City.

Respectfully,

Criss K. Moreno, MHA, MSG, MEd
Teacher
Technology Coordinator
Prop 39 Co-Location Coordinator
UTLA Chapter Chair
112th Street STEAM Academy
1265 E. 112th Street
Los Angeles, CA 90059
323-567-2108 (Ph.)
323-567-2611 (Fax)

The 112th Street STEAM Academy family is committed to providing a rich educational experience that supports all learners to be critical thinkers, problem-solvers and reflective individuals. We will endeavor to achieve excellence by building strong relationships with students, parents, and the community.



Responses to Letter 4 – Criss Sudar

Response to Comment 4-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 5 - Elissa Rubin - July 29, 2022

From: Elissa Rubin <rubineb@gmail.com>
Sent: Friday, July 29, 2022 2:20 PM
To: Jui Ing Chien
Subject: Robinson Gardens

CAUTION: External Email. Proceed Responsibly.

Ms. Chien,
The Gardens need to expand their hours of operation so they can maintain these beautiful gardens and facility. It is a great asset to the community at large and with the expansion they be able to raise more funds. I live in Santa Barbara which is known for the beautiful gardens it has including the very fantastic Lotusland. It is so important to have these wonderful places for the public to enjoy. They feed the soul! Thank you.
Elissa Rubin
Sent from my iPhone

5-1

Responses to Letter 5 – Elissa Rubin

Response to Comment 5-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 6 - Krista Everage - July 29, 2022

From: Krista Everage <kristaeverage@gmail.com>
Sent: Friday, July 29, 2022 12:21 PM
To: Jui Ing Chien
Subject: Virginia Robinson Gardens

CAUTION: External Email. Proceed Responsibly.

Dear Ms Jui Ing Chien,

I have had the pleasure to be a Friend of the Virginia Robinson Gardens for several decades. This treasure has enriched my life with beauty and the rich history of Los Angeles.

As a dedicated historical landmark with museum status, it would be wonderful to see the home and gardens on Elden Way be more accessible to the community at large through extended hours of visitation for tours and programs.

Thank you for all you do and your consideration of requests to achieve this goal!

Krista

Krista Everage
EverageDesign.com
310 200 7334 direct
@EverageDesign

6-1

Responses to Letter 6 – Krista Everage

Response to Comment 6-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 7 - Rebecca Spiegel - July 30, 2022

From: Rebecca Spiegel <rspiegs111@gmail.com>
Sent: Saturday, July 30, 2022 8:28 AM
To: Jui Ing Chien
Subject: Preserving VRG

CAUTION: External Email. Proceed Responsibly.

Dear Honorable Board of Supervisors:

I am a landscape designer in West LA. I got my start as a docent at the UCLA botanical gardens. The Virginia Robinson Gardens are also important public gardens for many to enjoy.

I am writing in support of the modification of the hours, days and special use events at Virginia Robinson Gardens because they will:

- 1) Allow the Gardens to better serve the community and its mission
- 2) Be open on days when families, school children and working people may attend together.
- 3) Increase the fundraising ability of the Friends of Robinson Gardens so that less taxpayer dollars are needed

Thank you for your consideration.

Rebecca Spiegel

Rebecca Bonney Garden Design Inc

Sent from my iPhone

7-1

Responses to Letter 7 – Rebecca Spiegel

Response to Comment 7-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 8 - Karen Sisman - July 31, 2022

From: Karen Sisman <eliora130@gmail.com>
Sent: Sunday, July 31, 2022 10:17 AM
To: Jui Ing Chien
Subject: I support increasing the number of events and access to the Virginia Robinson Gardens

CAUTION: External Email. Proceed Responsibly.

Dear Honorable Board of Supervisors,

I am writing to you in support of the modification of the hours, days and special events at the Virginia Robinson Gardens. I feel this is important because we need to preserve and share important historical aspects for presenting the area's history to the public. It's also important to promote a historical treasure on the National and local landmark registries.

8-1

Thank you for your support.

All the best,

Karen Sisman

--

This email has been checked for viruses by Avast antivirus software.
<https://www.avast.com/antivirus>

Responses to Letter 8 – Karen Sisman

Response to Comment 8-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 9 - Lynne Vinkovic - August 1, 2022

From: Rose Lane Farms <roselanefarms@sbcglobal.net>
Sent: Monday, August 1, 2022 8:20 AM
To: Jui Ing Chien
Subject: Robinson Gardens

Follow Up Flag: Flag for follow up
Flag Status: Flagged

CAUTION: External Email. Proceed Responsibly.

Hello Ms Jui Ing Chien

I am an advocate of Robinson Gardens and am in support of the modification of hours, days, and special use events at the gardens. This will allow the garden to better serve the community and its mission and have more flexible hours to accommodate more people's schedules

The garden is a gem and offers such a treasure to all which is why you need to support the modification

Lynne Vinkovic

9-1

Responses to Letter 9 – Lynne Vinkovic

Response to Comment 9-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 10 - Edie Bartnof - August 1, 2022

August 1, 2022

Ms. Jui Ing Chien, Park Planner
County of LA Department of Parks and Recreation
1000 S. Fremont Avenue, Unit #40 A-9 West 3rd Floor
Alhambra, Ca 91803

Dear Honorable Board of Supervisors

I am writing in support of the modification of the hours, days, and special use events at Virginia Robinson Gardens. It is my hope to protect the integrity and spirit of the cherished gardens.

Vista School has been honored to be included in the annual Spring Science event for several years. Many of our students have not had the experience of attending an event such as this. The docents are knowledgeable about the gardens, animals, and historical knowledge of the site. Docents are sensitive to the needs of the students that are in attendance. The students from Vista School have special education needs. Many of the students qualify for Title 1 funding. The docents in the garden were amazing in their enthusiasm and preparation for the students (games, tours, lovely and healthy lunch, entertainment, science experiments and meaningful gifts to take home). During Covid our school received science activities for the teachers to use with our students from the Friends of Robinson Gardens.

One year I remember going on a tour on what was a warm day. Just as the students were getting extremely hot and thirsty, we turned a corner. There was a table set up with fresh lemons. The docents made fresh lemonade for the students. The students were so excited. Most of them had never had fresh lemonade before. The delight and excitement on their faces were incredible. I had always hoped that more schools could be included in events such as this.

Many of the plants that I learned about I generalized into our gardens back at school and/or incorporated in my home garden.

I do not know if you have thought about increasing the ability for the Friends of Robinson Gardens to plan for fundraising ability. This would lessen the need for the support of taxpayer dollars.

The grounds of the gardens are magical. At a time when we are not preserving historical buildings and landmarks, it is important that not only do we preserve this site, but we pursue Robinson Gardens to be considered a historical treasure on the National and local landmark registers. It would be a gift to extend this treasure to our community. This would share with our greater community the importance of

10-1

horticulture, information about animals, architecture, historical perspective (photos showing the history of the area; old cars in the garages) and a lovely place for families to spend a lovely afternoon.

10-1
cont.

My sincerest best wishes,

Edie Bartnof, M.A.

Assistant Principal

Vista School

3200 Motor Avenue

Los Angeles, California 90034

(310) 836-1223 x 416

ediebartnof@vistadelmar.org

Responses to Letter 10 – Edie Bartnof

Response to Comment 10-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 11 - Evelyn Carlson - August 1, 2022

From: Evelyn Carlson <ecarlson9571@gmail.com>
Sent: Monday, August 1, 2022 12:43 PM
To: Jui Ing Chien
Subject: Fwd: Letter in support of increasing access to the Virginia Robinson Gardens

Follow Up Flag: Flag for follow up
Flag Status: Flagged

CAUTION: External Email. Proceed Responsibly.

>
>
> Dear Honorable Board of Supervisors:
>
> I am writing in support of proposed modifications to the EIRs regulating the hours, days, and special use events at the Virginia Robinson Gardens.
>
> Currently, most people need to be retired or not working in order to come to the Virginia Robinson Gardens. Hours for public access are 9:30 to 4:00 most days of the week and Saturdays. This greatly restricts access to a County of Los Angeles public park that is funded in large part by taxpayer dollars. This does not make good sense either in terms of common sense or financial sense.
>
> If public access hours were expanded to sunset and to include Sundays, as is the case with other County public parks, many more people and their families could visit and enjoy the Virginia Robinson Gardens. The estate is an invaluable green space within the predominately urban Los Angeles County.
>
> Increasing the number of special use events beyond the 4 such events already permitted would enable the Friends of Robinson Gardens to donate more funds to support programming for the Community and to maintain and preserve the Virginia Robinson Gardens estate. Many other botanical gardens in Southern California, including the Arboretum and Descanso Gardens, obtain a significant amount of funding from renting out their facilities for events and corporate meetings. Consequently, expanding the number of special use events at Robinson Gardens lies well within the scope of normal operations of a botanical garden.
>
> I support the expansion of the hours and days of operation of the Virginia Robinson Gardens as well as the number of special use events.
>
> Best Regards,
>
> Evelyn Carlson
> 2122 Century Park Ln. #318
> Los Angeles, CA 90067
>
>
>
>
> Sent from my iPhone

11-1

Responses to Letter 11 – Evelyn Carlson

Response to Comment 11-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 12 - Angela Cohan - August 1, 2022

From: Angela Cohan <cohan8@sbcglobal.net>
Sent: Monday, August 1, 2022 5:23 PM
To: Jui Ing Chien
Subject: Virginia Robinson Garden

Follow Up Flag: Flag for follow up
Flag Status: Flagged

CAUTION: External Email. Proceed Responsibly.

Dear Honorable Board of Supervisors:

I am writing in support of the modification of the hours, days and special use events at Virginia Robinson Gardens because they will:

*Allow the Gardens to better serve the community and its mission.

* Be open on days when families, school children and working people may attend together.

* Increase the fundraising ability of the Friends of Robinson Gardens so that less taxpayer dollars are needed.

* Preserve and share important historical/museum aspects for presenting area's history.

* Promote a historical treasure on the National and local landmark registries and enable our renowned Children's Science Program & tours for local & Title One school children to be better served.

12-1

Thank you,

Angela Cohan

Responses to Letter 12 – Angela Cohan

Response to Comment 12-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 13 - Ricki Ring - August 2, 2022

From: Ricki Ring <ricki@rmring.com>
Sent: Tuesday, August 2, 2022 2:16 PM
To: Jui Ing Chien
Cc: Betty Rodriguez Goldstein
Subject: Virginia Robinson Gardens

Follow Up Flag: Flag for follow up
Flag Status: Flagged

CAUTION: External Email. Proceed Responsibly.

Good afternoon

I am a long time member of the Friends and chaired two of their gala fundraisers.

The Gardens are a very important part of Los Angeles.

We have a short history and few places to experience magnificent gardens and a bygone way of life. The Gardens satisfy the emotions as well as a unique perspective on the past to everyone who has the privilege of experiencing them.

We would like to expand access to the Gardens —they are a treasure which should be shared.

Sincerely

Ricki Ring

PhD, JD

13-1

Responses to Letter 13 – Ricki Ring

Response to Comment 13-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 14 - Winston Chappell - August 2, 2022

From: Winston Chappell <winston@winstonchappell.com>
Sent: Tuesday, August 2, 2022 2:49 PM
To: Jui Ing Chien
Cc: info@robinsongardens.org; Winston Chappell
Subject: Support to increase hours and events at Robinson Gardens

Follow Up Flag: Flag for follow up
Flag Status: Flagged

CAUTION: External Email. Proceed Responsibly.

August 2, 2022

Dear Honorable Board of Supervisors
County of LA Department of Parks and Recreation

Dear Sir or Madam;

As a longtime supporter of the public access to Robinson Gardens, I **SUPPORT** the proposed modification of hours, days and special use events at Virginia Robinson Gardens to provide a more inclusive use of the Gardens and to expand the general public's understanding and enjoyment of this unique civic resource as a means to:

1. Preserve and share important aspects of the area's culture and history;
- 2) Preserve a historical landmark which is already registered on the National, State and local levels;
- 3) Enable our renowned Children's Science Program & tours for local & Title One school children to be better served;
- 4) Expand inclusiveness by opening on days when more families, schools, and civic groups can attend;
- 5) To allow the creation and implementation of new and innovative programs.

Thank you for your attention to this important issue.

Sincerely,
Winston Chappell
310 489 9497

14-1

Responses to Letter 14 Winston Chappell

Response to Comment 14-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 15 - Clare Wagner - August 2, 2022

2515 Angelo Dr.
Los Angeles, CA 90077

The Honorable Members of the Los Angeles County Board of Supervisors
Attn: Ms. Jui Ing Chien, Park Planner
Los Angeles Department of Parks and Recreation
1000 S. Fremont Ave., Unit #40 A-9 West, 3rd Floor
Alhambra, CA 91083

August 1, 2022

Dear Supervisors,

This letter supports the critical need to expand the hours of operation and number of events at Virginia Robinson Gardens (VRG).

VRG is located in an area easily accessible to the vast majority of Los Angeles County residents. It is a rare treasure intended to be enjoyed by visitors of all ages to teach a greater appreciation of gardens and historical garden design, and architecture and design.

Under current County restrictions, visitors can only visit VRG Mondays through Fridays, 9am to 4pm. This means that a huge population is cut off from the opportunity to visit due to school, work and other work week obligations. The Gardens operating hours MUST be expanded to allow a larger segment of the population to visit and enjoy firsthand the beauty and uniqueness of this County treasure.

The number of "events" at VRG also needs to be increased. These revenue generating events serve a dual purpose of introducing guests to VRG and increasing **private revenue** for its support. Bringing in outside funds results in less tax dollars needed to preserve and maintain our glorious VRG.

I hope that serious consideration will be given to this request. Thank-you.

Sincerely,

Clare Wagner

15-1

Responses to Letter 15 – Clare Wagner

Response to Comment 15-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 16 - Christine Marcus - August 2, 2022

From: lindahmeadows@gmail.com
Sent: Tuesday, August 2, 2022 7:05 PM
To: Jui Ing Chien
Cc: lindahmeadows@gmail.com
Subject: Increase public access to VRG

Follow Up Flag: Flag for follow up
Flag Status: Flagged

CAUTION: External Email. Proceed Responsibly.

Dear Jui,

Christine Marcus has written a letter previously about VRG to the County. I am forwarding her current letter! Thank you so much.

Kind regards,
Linda Meadows

-----Original Message-----

From: Chris Marcus <chrisma@earthlink.net>
Sent: Tuesday, August 2, 2022 12:05 PM
To: Linda Meadows <lindahmeadows@gmail.com>
Subject: Request for endorsement

Dear Linda,

I'd like to add my endorsement to the incredibly beautiful Robinson Gardens in Beverly Hills. It fills an otherwise void of culture, welcoming all who wish to participate in a mecca of arts and creativity. To be welcomed to this site to enjoy the historical landscaping is an honor in itself. To meet other people of like caliber who appreciate the refinement that is all too lacking in this day's society is a joy to be treasured.

Thank you for promoting it's continuation as the mainstay of what is loved by so many.

Christine Marcus

16-1

Responses to Letter 16 – Christine Marcus

Response to Comment 16-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 17 - Sandra Harris - August 3, 2022

From: Sandra Harris <skh@webtechla.com>
Sent: Wednesday, August 3, 2022 10:10 PM
To: Jui Ing Chien
Subject: Virginia Robinson Gardens

Follow Up Flag: Flag for follow up
Flag Status: Flagged

CAUTION: External Email. Proceed Responsibly.

To: Ms. Jui Ing Chien, Park Planner, County of LA Department of Parks & Recreation

I am writing in support of the Friends of Robinson Gardens. I am a new member, but have volunteered for several years at various events. What I am particularly impressed by is the children's education program. I had known about this program, but until I volunteered to help pack boxes to be sent to schools, I had no idea the quality and volume of materials provided to teachers and classes. We hear back from teachers about how beneficial the program is and how much they appreciate it.

I appreciate that the Friends of Robinson Gardens find ways to reach beyond their own community to make an impact.

Thank you for your time.
Sandra Harris

17-1

Responses to Letter 17 – Sandra Harris

Response to Comment 17-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 18 - Betty Goldstein - August 4, 2022

From: Betty Rodriguez Goldstein <gold7@earthlink.net>
Sent: Thursday, August 4, 2022 10:01 AM
To: Jui Ing Chien
Cc: 'Robinson Gardens'
Subject: Virginia Robinson Gardens

Follow Up Flag: Flag for follow up
Flag Status: Flagged

CAUTION: External Email. Proceed Responsibly.

Dear Honorable Board of Supervisors:

I am a docent for the Children's Science Program at the Virginia Robinson Gardens. In this capacity I teach mostly title one school children about plants, good nutrition and the environment. Our program is a wonderful learning tool for the school children. We would like to be able to bring more school children to the gardens to participate in this science program. As part of the program we encourage the school children to bring their families to the gardens to visit. This is difficult for working families, if the hours of the gardens were extended this would allow more families to come and experience this beautiful estate.

The Virginia Robinson Gardens is a special place; it is a National and local landmark and part of the history of early Los Angeles and Beverly Hills. We here at the gardens are dedicated stewards of this garden and would love to be able to share it with more people.

Please consider extending our hours and allowing more daily attendees.

Sincerely,

Betty R. Goldstein

Betty Rodriguez Goldstein

18-1

Responses to Letter 18 – Betty Goldstein

Response to Comment 18-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 19 - Lauren Brokaw - August 2, 2022

From: Lauren Brokaw <laurenqbrokaw@aol.com>
Sent: Thursday, August 4, 2022 1:14 PM
To: Jui Ing Chien
Subject: Virginia Robinson Gardens

Follow Up Flag: Flag for follow up
Flag Status: Flagged

CAUTION: External Email. Proceed Responsibly.

Dear Honorable Board of Supervisors:
I am a big fan of the lovely Virginia Robinson Gardens.
They are such an asset to Beverly Hills and Los Angeles !

I am writing in support of the modification of the hours, days and special use events at Virginia Robinson Gardens.

Below are a few reasons I would love to see this happen:

The gardens could be open on days when families, school children and working people may attend together.

Increase the fundraising ability of the Friends of Robinson Gardens so that less taxpayer dollars are needed.

Preserve and share important historical/museum aspects for presenting area's history.

Enable their renowned Children's Science Program & tours for local & Title One school children to be better served.

Thank you !

Best,
Lauren Brokaw
3109269274

19-1

Responses to Letter 19 – Lauren Brokaw

Response to Comment 19-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 20 - Haniyyah Jones - August 4, 2022

From: Floyd Jones <flohanjon@sbcglobal.net>
Sent: Thursday, August 4, 2022 3:29 PM
To: Jui Ing Chien
Subject: Virginia Robinson Gardens

Follow Up Flag: Flag for follow up
Flag Status: Flagged

CAUTION: External Email. Proceed Responsibly.

Dear Board of Supervisors:

I am in support of the modification of the hours, days, and special use events at Virginia Robinson Gardens which will:

Allow the Gardens to better serve the community and its mission through giving students the opportunity to engage with nature and learn the history of the area and its founders.

Modifying the hours will allow the gardens to be open on days when families, school children, and working people may attend together. The more people who attend and engage with this venue the more opportunities the venue will have to fundraise and lower its funding needs from tax dollars.

Thank you for your consideration.

Haniyyah Jones
107th Street Elementary

20-1

Responses to Letter 20 – Haniyyah Jones

Response to Comment 20-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 21 - Erika Safir - August 4, 2022

From: Erika Safir <erika.safir@gmail.com>
Sent: Thursday, August 4, 2022 4:52 PM
To: Jui Ing Chien
Subject: In Support of the Robinson Gardens

Follow Up Flag: Flag for follow up
Flag Status: Flagged

CAUTION: External Email. Proceed Responsibly.

Dear Ms.Chien,

I am writing to share my support for extending the hours and number of special events allowed for the Virginia Robinson Gardens.

As one of the most beautiful public gardens in Beverly Hills and Los Angeles, the current hours restrictions make it nearly impossible for most of the public to enjoy them. Extended hours would allow people who have traditional working hours time to visit the gardens, and better serve the community as a public good.

In addition, as a 3rd grade student, I vividly remember my tour at the gardens and learning about plants for the first time through their Children's Science Program. It is vital that this learning space be easily accessible for more children to have that experience, and increased hours would allow for more tours for local and title one schools to participate.

Allowing increased events would give the gardens a chance to fundraise more often, easing the burden of tax dollars to keep the gardens beautiful.

These gardens are enchanting and they were left to the city to be used for the public good. It is the city's duty to increase accessibility for the public to use this gift.

Best,
Erika

21-1

Responses to Letter 21 – Erika Safir

Response to Comment 21-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 22 - Malcolm McNeil - August 6, 2022

From: McNeil, Malcolm <malcolm.mcneil@afslaw.com>
Sent: Saturday, August 6, 2022 1:03 PM
To: Jui Ing Chien
Cc: McNeil, Malcolm; Madrid, Gladys
Subject: Virginia Robinson Gardens Support

Follow Up Flag: Flag for follow up
Flag Status: Flagged

CAUTION: External Email. Proceed Responsibly.

VIA EMAIL

Jui Ing Chien, Park Planner
County of Los Angeles - Dept of Parks and Recreation
1000 South Fremont Avenue, Unit #40 A-9 West, 3rd Floor
Alhambra, CA 91803

Re: Virginia Robinson (Robinson Gardens) Support and Expansion of Services

Dear Ms. Chien,

The purpose of this letter email is to support the expansion of resources and programming at Robinson Gardens, a true treasure in Los Angeles County.

Robinson Gardens is a one of a kind location that gives its visitors a glimpse into the past and at the same time provides educational resources unique in Los Angeles County. In order to fulfill its mission, it requires consistent activities and the fundraising capabilities essential for it to offer the events that are relevant to its mission.

To continue its important work, public accessibility is critical to preserve the historical aspects, while at the same time provide enjoyment and satisfaction to its visitors in an outdoor peaceful and paradisaal environment. It will also better serve the Children's Science Program that is widely lauded, and will further enable access to Title 1 ("No Child Left Behind Act") children deserving of this experience.

All of these worthwhile goals can be accomplished by expanding the visiting hours for families and events. I strongly hope the County supports the increase of service hours and days of operation so that these goals can be achieved. The notoriety and useful functions of Robinson Gardens will be enhanced and preserved for the benefit of the general public, as well as the residents of Los Angeles County.

Should you have any questions or wish to discuss this with me, I will make myself readily available.

Thank you for your work and dedication to our County's recreational activities.



Malcolm McNeil
PARTNER | ARENTFOX SCHIFF LLP
HE/HIM/HIS

malcolm.mcneil@afslaw.com | 213.443.7656 | 415.805.7981 **DIRECT**
[Bio](#) | [My LinkedIn](#) | [Subscribe](#)

Responses to Letter 22 – Malcom McNeil

Response to Comment 22-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 23 - Sherry Tedeschi - August 6, 2022

From: Bob & Sherry T <bevhillbillies@gmail.com>
Sent: Saturday, August 6, 2022 6:57 PM
To: Jui Ing Chien
Subject: Robinson Gardens

Follow Up Flag: Flag for follow up
Flag Status: Flagged

CAUTION: External Email. Proceed Responsibly.

Dear Honorable Board of Supervisors,

I've toured the Gardens, many times.

I feel the Gardens should be opened in days when working people, school children, and families may attend together.

It would be valuable to see the Robinson Gardens promote a historical treasure on the National and local landmark registries.

I support the alteration of the hours, days, & special use events.

Cordially,
Sherry Berk Tedeschi

23-1

Responses to Letter 23 – Terry Tedeschi

Response to Comment 23-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 24 - Kathleen Luckard - August 7, 2022

From: Kathleen Luckard <kathleen.luckard@gmail.com>
Sent: Sunday, August 7, 2022 4:03 PM
To: Jui Ing Chien
Subject: Re: Support for Virginia Robinson Gardens

Follow Up Flag: Flag for follow up
Flag Status: Flagged

CAUTION: External Email. Proceed Responsibly.

Dear Ms. Chien,

I have no idea why I dated my message August 12. Today, of course, is August 7. Senior moment....

Sincerely, Kathleen Luckard

On Sun, Aug 7, 2022 at 3:32 PM Kathleen Luckard <kathleen.luckard@gmail.com> wrote:
August 12, 2022

Ms. Jui Ing Chien, Park Planner
County of Los Angeles Department of Parks and Recreation
1000 South Fremont Avenue, Unit A-9 West, 3rd Floor
Alhambra, California 91083

Dear Ms. Chien,

I am writing in enthusiastic support of Virginia Robinson Gardens, a jewel in the crown of Los Angeles. In the mid-1850s, Los Angeles was a cluster of adobes in the middle of a desert. Through luck, hard work, a magnificent climate, and water, Los Angeles has become a vibrant area with many thriving industries – entertainment, technology, medical research and advances, etc. The future is bright, but the past must be honored to fully appreciate the area.

I am from Virginia. I moved to Los Angeles 12 years ago to be closer to my son, who is in the film industry. Because of my love for flowers, I found Virginia Robinson Gardens and soon became a docent, leading tours around the magnificent estate, sharing its history and beauty with the public. Unfortunately, arthritis in my knees and other leg problems means I can no longer lead groups up and down the steps of the estate and can only contribute when I can be seated.

Modifying the hours, days, and special use events at Virginia Robinson Gardens will cause the estate to better serve the greater Los Angeles community, allowing families, school children, and the working public to attend and tour the estate more easily, expanding the public's knowledge of this magnificent place. Virginia Robinson left her treasure to Los Angeles County because she knew the County's support of parks would assure the public would be able to continue to enjoy the verdant beauty she created over 66 years. Indeed, many of the plants and other botanical wonders in the Gardens came from her travels around the world, so botanical education is part of her gift.

24-1

Virginia, a much smaller state than California, has 51 houses on the National Register of Historic Places. California has 48 houses on the Register. The fact that Virginia Robinson Gardens is on the Register should be a point of pride for all citizens of Los Angeles County and increasing that pride should be a goal of the Department of Parks and Recreation.

24-1
Cont.

Sincerely,
Kathleen Luckard
659 South Cloverdale Avenue, Apartment 212
Los Angeles, California 90036

Responses to Letter 24 – Kathleen Luckard

Response to Comment 24-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Proposed Operational Changes at the
Virginia Robinson Gardens
Final Supplemental Environmental Impact Report

Letter 25 - Richard Rubins - August 8, 2022

From: Zalephotoart <richard@zalephotoart.com>
Sent: Monday, August 8, 2022 9:14 AM
To: Jui Ing Chien
Subject: Robinson Gardens useage

Follow Up Flag: Flag for follow up
Flag Status: Flagged

CAUTION: External Email. Proceed Responsibly.

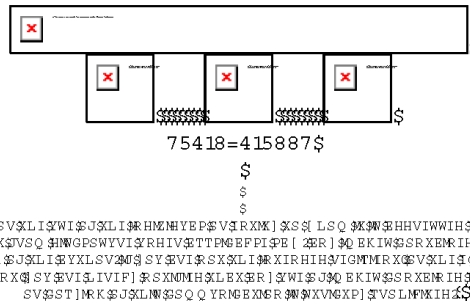
Dear Honorable Board of Supervisors:

I am writing in support of the modification of the hours , days and special use events at Virginia Robinson Gardens because they will:

- 1) Allow the Gardens to better serve the community and its mission
- 2) Be open on days when families, school children and working people may attend together.
- 3) Increase the fundraising ability of the Friends of Robinson Gardens so that less taxpayer dollars are needed.
- 4) Preserve and share important historical/museum aspect for presenting area's history
- 5) Promote a historical treasure on the National and local landmark registries
- 6) Will allow renowned science program & tours for local & Title One school children to be better served

A treasure such as Robinson Gardens should be seen and with respect shown for its community this should be an attainable goal.

Thank You,
Richard Rubins



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Responses to Letter 25 – Richard Rubins

Response to Comment 25-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 26 - Suzanne Hertfelder - August 8, 2022

From: suzanne hertfelder <tigersuzy@icloud.com>
Sent: Monday, August 8, 2022 12:11 PM
To: Jui Ing Chien
Subject: Virginia Robinson Gardens

Follow Up Flag: Follow up
Flag Status: Flagged

CAUTION: External Email. Proceed Responsibly.

Dear Ms. Chien and Honorable Supervisors:

I am writing in support of the modification of hours of operation, days open to the public and special events at Virginia Robinson Gardens.

I have visited this historic jewel in our city on numerous occasions and have brought visitors both local and out of town guests to enjoy this unique example of an early California Estate with its rare and exotic flora.

I have attended numerous charity events at Robinson Gardens and have found that they follow the highest standards of quality and care. I was able to share several evenings with my 93 year old mother-in-law because of the emphasis on safety.

Robinson Gardens takes great care in organizing the valet parking and shuttles to minimize impacts on guests and the neighbors.

One of the events I was privileged to attend raised over a hundred thousand dollars for a charity that provides food, education and training to at risk youths throughout Los Angeles County.

My personal opinion, the overall good outweighs any possible objections and all of Los Angeles County would be well served if the Supervisors allow more public access to the Virginia Robinson Gardens.

Warmest regards,
Suzanne Hertfelder

26-1

Responses to Letter 26 – Suzanne Hertfelder

Response to Comment 26-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 27 - Elaine Stein - August 8, 2022

AUG 8 22 8:38H

Ms. Jui Ing Chen
Park Planner
Dept. of Parks & Recreation
1000S. Fremont Ave.
Unit A-9. 3rd Floor
Alhambra, 91083 CA
Dear Ms. Chen

I have been an active member of Friends of Robinson Gardens for many years and have served on the Board for four years. We have a wonderful Garden Tour once a year as well as several Educational Events. The Friends takes great care of the estate as well as the gardens, and are very dedicated to maintaining the property. Many of us have been active for many years and treasure the property. I look forward to many more years of volunteering at the gardens.

27-1

Sincerely,



Elaine Stein

Responses to Letter 27 – Elaine Stein

Response to Comment 27-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 28 - Richard Doran - August 8, 2022

From: Richard Doran <richardjdoran@yahoo.com>
Sent: Monday, August 8, 2022 3:43 PM
To: Jui Ing Chien
Subject: Support for Virginia Robinson Gardens

Follow Up Flag: Follow up
Flag Status: Flagged

CAUTION: External Email. Proceed Responsibly.

I am a professional photographer, who volunteered to teach photography to youth in El Nido's GRYD (Gang Reduction Youth Development) program for 10 years. During that time, I had the opportunity to take the young photographers on annual field trips to the Virginia Robinson Gardens. These trips served a two-fold purpose. They provided the youth with a wide variety of amazing photo opportunities, but more importantly, they exposed the youth to new experiences and possibilities. Many of these youth had never been outside of Pacoima, and these trips opened up opportunities, photographic and developmental, that they never would have had. Of all of the field trips we would go on, I think those to the Robinson Gardens made the biggest impact on the youth.

28-1

Richard Doran









Responses to Letter 28 - Richard Doran

Response to Comment 28-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 29 - Robert Lopez - August 8, 2022

From: Richard Doran <richardjdoran@yahoo.com>
Sent: Monday, August 8, 2022 3:49 PM
To: Jui Ing Chien
Subject: Support for Virginia Robinson Gardens

Follow Up Flag: Follow up
Flag Status: Flagged

CAUTION: External Email. Proceed Responsibly.

I also wanted to include a note and photo from one of the youth in my photography class. He participated in the program for five years.

As a youth with GRYD (the Gang Reduction and Youth Development) program, I was invited to explore the beautiful architecture and breathtaking grounds of Virginia Robinson Gardens. It served as inspiration to continue to explore different environments as well as giving me a new perspective of what I could achieve. I've been able to display my photography in countless locations. But none compared to the opportunity of displaying my work in such a historically significant place. Displaying my art at The Virginia Robinson Gardens allowed me as a young photography student to feel validated and reassured. It continues to be a highlight of my youth.

Robert Lopez

29-1



Responses to Letter 29 – Robert Lopez

Response to Comment 29-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 30 - Kevin & Valerie Miller - August 8, 2022

From: Kevin Lee Miller <kevinleemiller01@gmail.com>
Sent: Monday, August 8, 2022 6:18 PM
To: Jui Ing Chien
Subject: Robinson Gardens Extended Access

Follow Up Flag: Follow up
Flag Status: Flagged

CAUTION: External Email. Proceed Responsibly.

Dear Ms. Chien,

My wife and I fully support making Virginia Robinson Gardens more accessible to the public through expanding the hours and days it is open. Presently, the times the property is open make it difficult for people with day jobs to visit.

A trip to Robinson Gardens is a truly unique experience and the more people who can enjoy this gem the better.

Additionally, I believe facilitating special use events would make it possible for the Friends of Robinson Gardens to hold fundraisers that would support property maintenance and special educational programs without relying on taxpayer dollars.

Thank you,
Kevin & Valerie Miller

30-1

Responses to Letter 30 – Kevin and Valeria Miller

Response to Comment 30-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 31 - Rose Norton - August 8, 2022

From: Rose Norton <rose@tvisok.com>
Sent: Monday, August 8, 2022 6:27 PM
To: Jui Ing Chien
Subject: support for Robinson Gardens EIR on Wednesday

Follow Up Flag: Flag for follow up
Flag Status: Flagged

CAUTION: External Email. Proceed Responsibly.

Virginia Robinson Gardens is a great asset to Los Angeles County and I urge the Supervisors to allow more accessible hours and days so more people will be able to take and advantage and enjoy this wonderful facility.

I totally support their mission and goals and hope you can accomodate their requests.

sincerely,

Rose Norton

31-1

Responses to Letter 31 – Rose Norton

Response to Comment 31-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 32 - Phil Savenick - August 9, 2022

From: Phil Savenick <fabphil52@gmail.com>
Sent: Tuesday, August 9, 2022 10:51 AM
To: Jui Ing Chien
Subject: support for expanded use of Virginia Robinson Gardens

Follow Up Flag: Flag for follow up
Flag Status: Flagged

CAUTION: External Email. Proceed Responsibly.

I fully support the request to expand hours, days, and events at Virginia Robinson Gardens.

It is a much needed attraction for visitors and residents. Unfortunately, because of the restrictions on when it can be visited, it is difficult for working families to fit into the available times and size quotas.

It is a hidden gem. Make it more accessible and thus... more self-sufficient.

Please consider approving their request. The public good for thousands outweighs any minor annoyance to the residents of a few nearby estates.

Phil Savenick
Resident
Los Angeles 3rd District

32-1

Responses to Letter 32 – Phil Savenick

Response to Comment 32-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 33 - Phil Savenick, Beverly Hills Historical Society - August 9, 2022

From: Beverly Hills Historical Society <bevhillshistorical@gmail.com>
Sent: Tuesday, August 9, 2022 10:38 AM
To: Jui Ing Chien
Subject: support for Virginia Robinson Gardens expanded hours

Follow Up Flag: Flag for follow up
Flag Status: Flagged

CAUTION: External Email. Proceed Responsibly.

Dear Ms. Chien,

The Beverly Hills Historical Society fully supports the request by the Virginia Robinson Gardens to expand the days and hours the property is accessible to the community in order to better serve the public interest.

Virginia Robinson Gardens is the legacy of one of Los Angeles' most impactful female pioneers. Pioneers came in all shapes and sizes. This woman, though barely 5-feet tall, was the dynamo who, starting in 1911, built an oasis of botanical wonders in the desert of Beverly Hills when it had less than 90 residents and almost no trees. Virginia and her husband Harry would travel the world for their department store Robinsons, She took an arborist along whose job was to source the exotic plants she found and ship them back to Los Angeles. Her African Coral Tree was the first in America and provided the source for every tree planted along the San Vicente Boulevard median to the sea.

The house was a legendary site of up to six parties a week and the proceeds of her Harvest Moon Ball benefitted the Los Angeles Philharmonic, Hollywood Bowl, and she and Dorothy Chandler used the parties to attract donors to help in the construction of the Music Center.

The historical importance of Virginia Robinson Gardens is unique. Its "as-live-in" condition makes It a treasure that should be more accessible to serve more of our community.

Sincerely,

Phil Savenick
President
The Beverly Hills Historical Society

33-1

Responses to Letter 33 – Phil Savenick, Beverly Hills Historical Society

Response to Comment 33-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 34 - Carter Calhoun - August 9, 2022

From: Carter Calhoun <ccalhoun@elnidofamilycenters.org>
Sent: Tuesday, August 9, 2022 2:40 PM
To: Jui Ing Chien
Subject: Virginia Robinson Gardens, please note my support for expanded access...

Follow Up Flag: Flag for follow up
Flag Status: Flagged

CAUTION: External Email. Proceed Responsibly.

Dear Jui,

I am writing to support the requests by Virginia Robinson Gardens to increase access to this unique landmark. As El Nido's Development Director over the past 6 years, I can attest to the fact that our annual event there that has enabled us to fund services and guidance for hundreds of underserved children and families throughout Los Angeles County.

- Through El Nido's Robinson Garden's events over the past 7 years, they have grossed just under \$1.5M, to:
 - Provide critical support to struggling new parents,
 - Support families experiencing hardship by providing food, housing support, mental health services;
 - protect children from abuse, neglect and alleviate the terrible impact of poverty,
 - steer youth away from gangs, provide tutoring and mentorship and scholarships, to help them on their path to higher education and careers;

Thank you for your consideration, and kindly confirm receipt.

Warm regards,

Carter Calhoun

Director of Development
El Nido Family Centers
(818) 639-8428
ccalhoun@elnidofamilycenters.org
440 Shatto Place, Suite 417, Los Angeles, CA 90020
Read our latest Annual Report [HERE](#)

Watch a brief video about El Nido [HERE](#)

34-1

Responses to Letter 34 – Carter Calhoun

Response to Comment 34-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 35 - Lori Greene Gordon - August 9, 2022

Lori Greene Gordon

Dear Honorable Members of the Board of Supervisors:

I am writing in support of the enhanced hours of operation and events that you are contemplating for Virginia Robinson Gardens. I first visited the gardens nearly 20 years ago and have, in the intervening years, become a member of its support group, the Friends of Robinson Gardens. I am also in a unique position to comment, as a recently-retired Planning Commissioner for the City of Beverly Hills.

As you can imagine, I have a good deal of experience reviewing EIRs and dealing with neighborhood concerns in relation to various projects that came before me during my tenure. Seldom have I experienced a situation where the benefits to the entity far outweigh the concerns of the surrounding neighbors. This is an instance where it does, primarily because of the large size of the subject property.

I attended a scoping meeting a few months ago over Zoom. At the time, I observed that one homeowner rallied all of the surrounding neighbors to express concerns about the enhancements. Their concerns did not square with the facts of the case. Parking was cited as a primary objection. However, those neighbors live on Cove Way, far from the Gardens entrance, and would not experience any noticeable change in their street parking. Noise was another concern. Within the Gardens' 6.5 acres, there is ample space and ability to shield any additional noise that would be generated from any events that take place.

As you know, you are well within your rights to condition this approval any way you wish. What I can certainly attest to is that enhanced hours and an increase in allowable events are imperative for the continued successful operation of the Gardens. In order for this important resource to be equitably enjoyed by all of our county's residents, weekend and after work hours are necessary. In order to serve Title I school children with our renowned science program, the Gardens need increased capacity limits. In order for the facility to become more self-sufficient, diminishing the need for increased county support, the Gardens need to have more opportunities to host events that bring in revenue. All of these things can and will be done in a responsible manner that will not be impactful to the surrounding neighbors.

I heartily encourage you to vote YES on this matter and thank you for your time and consideration.

Sincerely,

Lori Greene Gordon
Former Beverly Hills Planning Commissioner (2015-2021)

35-1

Responses to Letter 35 – Lori Greene Gordon

Response to Comment 35-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 36 - Eliana Sisman - August 10, 2022

From: Eliana Sisman <floatyleaf1@gmail.com>
Sent: Wednesday, August 10, 2022 7:52 PM
To: Jui Ing Chien
Subject: Public Comment on the Virginia Robinson Gardens Proposed Operational Changes

CAUTION: External Email. Proceed Responsibly.

Hello! My name is Eliana and I am a resident of Los Angeles County.

As the daughter of a docent and a visitor to the Virginia Robinson Gardens, I have seen how much joy the Gardens brings people. In this time of a mental health crisis and environmental degradation, we must expand access to the beauty of majestic nature and excellent architecture.

The proposed changes would increase the number of people who can enjoy the Gardens, as well as increasing access by extending the days and hours when the Garden is open beyond the workweek and promoting the use of public transit and Rideshare to bring in Garden visitors. This make our country more accessible and joyful.

Thank you for your hard work to advance the flourishing of the people!

Best,

Eliana Sisman

36-1

Responses to Letter 36 – Eliana Sisman

Response to Comment 36-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 37 - Sharon Messer - August 11, 2022

From: Sharon Messer <sharonmesser@gmail.com>
Sent: Thursday, August 11, 2022 5:35 PM
To: Jui Ing Chien
Cc: Kathy Checchi; Jodi Stine; Chuck Alpert
Subject: Robinson Gardens Operational Changes

CAUTION: External Email. Proceed Responsibly.

Dear Ms. Chien,

I am a neighbor to the Robinson Gardens and a resident of Beverly Hills. I feel that it is totally inappropriate for those who are not close neighbors to say that we will not be impacted by the proposed changes and that we need to live with the consequences "for the greater good". I find that the SEIR report is incomplete. We are impacted and your demands are totally unreasonable.

1. Every time there is an event on Elden Way, we hear every word and every song as if the microphone and/or amplifier were used on Cove Way in our own backyards. Sound carries in the foothills.

2. When the RG has had their major fundraisers, event staff, volunteers, etc. have parked on our street as they set up and run the event. Often not just for one day but several consecutive days.

3. There is no definition as to the number of special events in terms of type of event or when the event must end. Perhaps you should consider stating the number of events that are directly supported by the RG and where 100% of the profit benefits the Garden versus the number of outside charity events or family events you plan to hold whereby the Gardens only receives a facility or use fee. Likewise, there is no stated cap on the number of people who may attend a special event.

4. You are proposing that the Gardens be open until Sunset. Does this mean that you will have all staff and personnel off the property by the time twilight ends? Or are you planning to extend the hours for special weekend and evening events? It would be much more palatable if all staff, guests, and personnel were off the property by the end of twilight. (For example, on June 23, the longest day of the year, Sunset is at 8:10 and twilight ends at 8:37. August 10 Sunset was at 7:47 with last light scheduled for 8:11 and in the winter months when the days are much shorter, twilight ends by 6:00 p.m.)

5. While you recommend 200 visitors per day, does this number also include personnel? It takes a lot of staff to run any kind of an event. You have not listed a cap on the number of people who may attend a special event or whether staff/personnel are included in this cap. This implies that you can have an unlimited number.

6. Also, once the County changes the number of events, hours, etc. who is to say whether visitation to the Gardens will continue to be by appointment only? Or that the definition of a special event wouldn't be changed? Or that the County wouldn't decide to run events without RG docents being present.

7. While you encourage public transportation and ridesharing, the reality is that many people *park their cars on neighboring streets* and walk to the Gardens when there is a large event. You cannot promise or guarantee that guests and staff will not park in our neighborhood.

8. As a neighbor who has supported the Robinson Garden in the past, I fully support their daytime activities but object to more than the 4 evening events currently allowed. I support the use of the Garden as an educational and research facility as well as a Botanical Garden. I DO NOT SUPPORT THE USE OF THE GARDEN AS A PARTY VENUE.

Sincerely,
Sharon A. Messer
1020 Cove Way, Beverly Hills, CA 90210

Responses to Letter 37 – Sharon Messer

Response to Comment 37-1:

This comment provides introductory material from the commenter, including the fact that they are a neighbor to the Project Site. The commenter also expresses opposition to the Proposed Project and claims that the Draft SEIR is incomplete. This comment is noted.

Response to Comment 37-2:

The commenter states that they can hear amplified noise from events in the neighborhood, emphasizing that sound carries in the foothills. Noise impacts from the Proposed Project are discussed in Section 3.14, *Noise*, beginning on page 3-29 of the Draft SEIR. The County has also prepared a site-specific noise impact study, which is included as Appendix E of the Draft SEIR. Please refer to Master Response 4 and Master Response 5. This comment is noted.

Response to Comment 37-3:

The commenter states that Gardens event staff and volunteers park their vehicles on neighborhood streets during events, often for several days. Parking is discussed in Section 2.2.3, *Special Use Events*, on page 2-4 of the Draft SEIR and Section 2.4.5, *Parking*, beginning on page 3-29 of the Draft SEIR. Parking and traffic impacts associated with the Proposed Project are discussed in Section 4.18, *Transportation*, beginning on page 3-61 of the Draft SEIR. The County has also prepared a site-specific traffic impact assessment for the Proposed Project which is included as Appendix F of the Draft SEIR. Please refer to Master Response 1, Master Response 2, and Master Response 3. This comment is noted.

Response to Comment 37-4:

The commenter states that the Draft SEIR does not specify types of events, event start/end times, or a maximum guest count. As outlined on page 2-4 of the Draft SEIR, attendance at Special Use Events is typically 350 guests per event. Although there is no specific cap on the number of guests who may attend a Special Use Event, tickets would be sold to regulate the number of visitors to ensure safety and a quality experience. The subject matter for events and event timing would be determined at the discretion of the Superintendent on a case-by-case basis and would be consistent with the bequest.

The commenter also states that the Draft SEIR does not specify event funding sources, subject matter, or timing. The subject matter and timing of events would be determined at the discretion of the Superintendent, on a case-by-case basis. This comment is noted.

Response to Comment 37-5:

Staff will be onsite during the operating hours of the Gardens and leave shortly after closing. Staff will also be present during Special Use Events and will close up after the departure of all guests. This comment is noted.

Response to Comment 37-6:

This comment focuses on daily visitor guest count, Special Use Event guest count, and staffing. As displayed in Table 2-1. Proposed Operational Changes on page 2-5 of the Draft SEIR, up to 200 visitors per day would be able to attend docent tours, seminar/classes, commercial filming (video only, no motion picture) or a combination of any of these activities. The visitor maximum does not include staff, volunteers, or security.

As outlined on page 2-4 of the Draft SEIR, attendance at Special Use Events is typically 350 guests per event. Although there is no specific cap on the number of guests who may attend a Special Use Event, tickets would be sold to regulate the number of visitors to ensure safety and a quality experience. The number of employees and volunteers needed on site daily would increase proportionally to increased hours of operation, as approved by the Board of Supervisors.

Response to Comment 37-7:

The commenter questions whether appointments will still be required for event attendance. All visitors would continue to be required to purchase a reservation in advance. As displayed in Table 2-1. Proposed Operational Changes on page 2-5 of the Draft SEIR, up to 200 visitors per day would be able to attend docent tours, seminar/classes, commercial filming (video only, no motion picture) or a combination of any of these activities. All visitors would continue to be required to purchase a reservation in advance. Similarly, tickets would be sold for Special Use Events to regulate the number of visitors to ensure safety and a quality experience. The subject matter for events would be determined at the discretion of the Superintendent on a case-by-case basis and would be consistent with the bequest. All events would continue to be run and managed by County staff.

Response to Comment 37-8:

The commenter states that guests often park their vehicles on neighborhood streets during events. Parking is discussed in Section 4.11, *Land Use*, on page 3-77 of the Draft SEIR and Section 4.18, *Transportation*, on page 3-69 of the Draft SEIR. Please refer to Master Response 2 and Master Response 3.

Response to Comment 37-9:

The commenter expresses support for the Gardens under current operation, but opposition to the use of the Gardens as a "party venue." As this comment is an opinion and not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 38 - Karen Platt - August 14, 2022

From: Karen Platt <platt.karen@gmail.com>
Sent: Sunday, August 14, 2022 12:30 PM
To: Jui Ing Chien
Subject: Virginia Robinson Gardens

CAUTION: External Email. Proceed Responsibly.

Dear Honorable Board of Supervisors,

I am a long time resident of the City of Beverly Hills and am writing to you to support the modifications being requested by the Virginia Robinson Gardens. The modification of days, hours and special uses will certainly allow the Gardens to better serve the greater community and further its mission.

The present limitations make it difficult for families, school children and working parents to visit the Gardens together, and the modifications will make the Children's Science Program and the tours more accessible not only to local children but to the greater community, including those in Title One schools. There are so many benefits to having children visit the Gardens and there are so few locations in the greater Los Angeles area where they can visit this kind of a historical museum and extensive gardens.

Further, allowing the modifications will help the Friends of Robinson Gardens with their fundraising efforts, thus helping to make the Gardens to be less of a drain on taxpayer funds.

Please support their requested modifications.

Karen Platt

38-1

Responses to Letter 38 – Karen Platt

Response to Comment 38-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 39 - Natalie Gordon - August 14, 2022

Natalie Gordon

Dear Honorable Board of Supervisors:

I write to you in support of the increased hours of operation and events proposed for Virginia Robinson Gardens. Unlike many Los Angeles County residents, I was fortunate enough to learn about the Gardens at a young age. My third-grade class took a field trip there and from that day on, I never forgot about its beauty, tranquility, and history. I was so enamored with the gardens that I sought out volunteer opportunities after college, and as one of the youngest volunteers at Robinson Gardens, I recognize that the Gardens need more volunteers and supporters in their 20s and 30s.

Virginia Robinson Gardens is a cultural treasure, and in order to sustain it for future generations, we need a continuous flow of committed volunteers. Unfortunately, given the Garden's currently allowed operational hours, young people are at a disadvantage if they want to participate in VRG activities while also working conventional hours.

I've often tried to recruit friends to volunteer at the Gardens. When I try to introduce them to the Gardens by offering to arrange a tour or inviting them to events, most are forced to decline when they realize that the majority of activities at the Gardens take place during their work hours. No matter how virtual and portable work becomes, many young people working to build careers still must be available during conventional working hours, and they have options for volunteer opportunities with other organizations that have fewer restrictions. While I am fortunate to have time in my work schedule for volunteer opportunities, most young people aren't given this opportunity.

The unintended consequence of the Gardens' limited hours is that, with fewer young people aware of the organization, and fewer young people participating in Garden activities, the volunteer and donor pools of the Gardens are aging. While we love our volunteers and donors of all ages, we need to provide value to young people if we want to ask them for help or money. With their help comes more volunteers who will work to preserve this piece of history and with their donations come less reliance on taxpayer dollars. Therefore, a vote to increase the hours of operation is a vote to both provide more equitable access to one of the most beautiful places our county offers and to give the Gardens an even stronger future. I urge you to consider doing just that.

Sincerely,

Natalie Gordon

39-1

Responses to Letter 39 – Natalie Gordon

Response to Comment 39-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 40 - Suzette Mayes - August 15, 2022

From: Mayes, Suzette <smayes@lausd.net>
Sent: Monday, August 15, 2022 3:27 PM
To: Jui Ing Chien; Mayes, Suzette
Subject: Children's Science Program at Robinson Gardens

CAUTION: External Email. Proceed Responsibly.

Dear Ms. Jui Ing Chien,

I am writing in support of the programs offered by Robinson Gardens, specifically the children's science programs that are offered to LAUSD school aged children. I am asking that you please increase the fund-raising ability of Friends of Robinson Gardens so that less taxpayer dollars are needed. In addition to this please enable the Children's Science Program and tours for LAUSD Title One school children to get additional funding so that it may continue. My students were very engaged with the science programs fully funded by Robinson Gardens. Robinson Gardens provided all of the hands-on learning materials for my students, as well as a few healthy snacks! This past school year, (2021-2022), my students were very excited to learn all about the life cycle of frogs using the materials provided by Robinson Gardens.

Sincerely,

Suzette Mayes

4th Grade Teacher

Hillcrest Drive Elementary School

40-1

Responses to Letter 40 – Suzette Mayes

Response to Comment 40-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 41 - Jenna Mirander - August 15, 2022

From: Mirander, Jenna <jenna.mirander@lausd.net>
Sent: Monday, August 15, 2022 3:54 PM
To: Jui Ing Chien
Subject: Supporting the Virginia Robinson Gardens

Follow Up Flag: Flag for follow up
Flag Status: Completed

CAUTION: External Email. Proceed Responsibly.

Dear Honorable Board of Supervisors:

I am a third grade educator at Hillcrest Drive Elementary and I am writing in support of the modification of the hours, days and special use events at Virginia Robinson Gardens because they will allow the Gardens to better serve the community and its mission.

I currently teach at a Title I elementary school in the Crenshaw community and the Virginia Robinson Gardens sent us an incredibly informative binder covering the frog life cycle unit. My students thoroughly enjoyed the learning we did in this thoughtfully planned unit. They loved the resources that accompanied their learning materials, as well. I would love to increase the fundraising ability of the Friends of Robinson Gardens so that less taxpayer dollars are needed. The way the Virginia Robinson Gardens is currently serving Title One school children is phenomenal and I would love for them to have the resources they need to continue to serve this population.

Thank you for your time,
Jenna Mirander

3rd Grade Educator
Hillcrest Drive Elementary School

41-1

Responses to Letter 41 – Jenna Mirander

Response to Comment 41-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 42 - Jennifer Roberston - August 15, 2022

From: Robertson, Jennifer <jlr7982@lausd.net>
Sent: Monday, August 15, 2022 5:52 PM
To: Jui Ing Chien
Subject: Virginia Robinson Gardens

CAUTION: External Email. Proceed Responsibly.

Dear Honorable Board of Supervisors:

I am writing in support of the modification of the hours, days and special use events at Virginia Robinson Gardens because they will:

- Allow the Gardens to better serve the community and its mission.
- Be open on days when families, school children and working people may attend together.
- Enable our renowned Children's Science Program & tours for local & Title One school children to be better served

As a teacher, I have been able to take advantage of their science program to help my students learn about the life cycle of frogs. Their materials are engaging and help students become excited about science. It would be even more beneficial if they were able to be open more hours for field trips.

Thank you for your time and interest in this matter.

Sincerely,
Jennifer Robertson
3rd grade teacher
Hillcrest Drive Elementary School

42-1

Responses to Letter 42 – Jennifer Robertson

Response to Comment 42-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 43 - Robin Kim - August 15, 2022

August 15, 2022

Via EMAIL

Jui Ing Chien
Park Planner
County of Los Angeles
Department of Parks and Recreation
jChien@parks.lacounty.gov

Re: Comments on Proposed Operational Change of the Virginia Robinson Garden

Dear Sir/Madam,

The Virginia Robinson Garden is located at the end of Cul de sac in the completely dead- end residential area. I live next to the Garden thus I am familiar with the situations how the operation of Garden affects daily lives of neighbors. With the philanthropic heart and mind, the late Mrs. Robinson donated her lifetime residence to the County government wishing that it will benefit public for education. Thus the bequest agreement specifically states that, in short, "it will be an arboretum garden for educational purpose; **no business for profit** shall ever be conducted on said property; and will be available for public at reasonable times." County officials and Beverly Hills City officials signed.

The County has already breached the original donor agreement by conducting fundraising events and opening events for the Friends of Robinson Garden like a social club since 2014 with their expanded operational activities. Now 2021 proposal is to abolish the donor agreement completely.

Here are my short statements about the how the new 2021 proposal is in breach of the original donor agreement.

- (1) For Arboretum use requirement. The original donor agreement specifically states that the estate will be used as arboretum for educational purpose. The donor wished and made it clear that the estate will be open to public for educational purpose only. Here the public for the education purpose means scientists, researchers, and students for research, study and for education. The donor never intended the estate home will be later used for weddings and commercial events by the County government. It is outright overriding the donor's purpose.
- (2) No Business Activities requirement. Secondly, the Friends of Robinson Garden ("Friends Group") runs the Garden, mostly for their social activities unrelated to the purpose of arboretum and for its education. Under the donor agreements, there was a specific funds were set aside for maintenance purposes. If the County government

43-1

is unable to sustain to maintain the property solely for the purpose of education, it should first inspect the operational books and accounting to know how it is depleted and made it public upon request. Nonetheless, if the County is unable to self-sustain any further, the estate should be given to the beneficiary next in line, or find other ways without breaching the agreement, without the turning the estate into the commercial event place in the residential area.

43-1
cont.

- (3) At the Reasonable Time requirement. Thirdly, the 2021 proposal of 7 days week and dawn to dusk is clearly not at the reasonable time for the proposed educational purpose.

The expansion of Garden operation made in 2014 was made for the purposes to provide more garden tours to the public and to include for fundraising activities which mostly unrelated to the arboretum study and education. This expanded operation created harms already at the cost of neighbors' sacrifices. Now the 2021 Proposal is proposing further expansion.

In addition to the increased traffic to the neighbor and neighboring communities and the adjacent cities, here are some examples of unreasonableness effect that will bring into the close neighbors:

43-2

Fire. During this unprecedented drought situation in the southern California which will get worse and worse due to environmental issue, the risks of large public gatherings that will bring into this Cul du sac area is simply unreasonable.

Crime. People loiter around the street for waiting their garden appointment. With this increased and massive gathering, the neighbors are exposed to the strangers who may be in presence without purpose or with wrong purpose. Even now, whenever strangers wander the streets, we must worry if they are for the Garden visit or for something else. Even though the city ambassador tells us to notify for any strangers, how do we know until things happened? My house already had intrusions twice in recent years. I notified about the intrusion to the Garden superintendent, and they installed 40 some CCTV cameras newly. With masks on in this era, CCTVs do not really help. The more unspecified public have access in the residential neighbor, it will bring more crimes in the area and we have no prevention.

43-3

Noise Traffic, Chaotic environment. Whenever there is an event at the Garden the days before and after, the catering and equipment trucks occupy the Cul de sac, dead-end street. The routine trash collecting trucks, gardeners' trucks, pool man's maintenance trucks, construction trucks, and delivery vans fight for space making backing noises all the time. At night we hear loud music sound from the Garden and some other houses.

43-4

Emergency. When the dead-end street and neighboring streets are blocked by visitors and tourists, and their vehicles, the emergency cars have difficulty to access, and our lives are at danger. If Fire erupts, it will bring out unthinkable results.

43-5

There are so many urgent issues in the L.A. County, most importantly the issues like exponentially growing number of homelessness, issues with low-income housing, unequal medical access, gun-control, unmaintained streets, etc. and where the crimes and vandalisms are soaring all over, how L.A. County propose this idea in the name of public benefits. I urge government be reasonable and put resources to make each and every neighbor within the County better and safer place, not the other way around.

I wish to guess that the proposal was planned based on naïve idea without knowing the facts and effects. I worry if it was planned by influence of someone who is privileged enough to afford the cost of all the caterings from outside caterer, valet parking services, and all to have their family members to have luxurious weddings and bar or bat Mitzvah kind of events. The proposed change will only serve those who want more experience that others can't afford, and the existing luxurious hotels and country clubs that exist for that purpose are not enough.

43-6

The estate is located in the residential dead-end fire zone area. Please find a way to make the property to be used by less number of people only for the academic studies, and educational purposes in order keep the integrity of the estate and its special garden. Please keep the terms of donor agreement, without breaching the zoning rules, without breaching the heart of neighbors.

Sincerely yours,



Robin Kim
1005 Elden Way

Responses to Letter 43 – Robin Kim

Response to Comment 43-1:

Thank you for your comment. This comment provides introductory material from the commenter, including the fact that they are a neighbor to the Project Site. The commenter also claims that the County has breached its original donor Agreement. It is important to note that the request at hand is to make changes to the existing operational characteristics of the Virginia Robinson Gardens which is a public facility owned and operated by the Los Angeles County Department of Parks and Recreation. While the County makes every attempt to be a good neighbor to the surrounding residential uses and to maintain the essence of the single-family residential character/estate that was the Robinson Estate, the allowable land use was changed from single-family residential to public open space and garden in 1980, as disclosed on page 3-77 of the Draft SEIR. Please refer to Master Response 8.

Response to Comment 43-2:

The commenter expresses concern for the threat of wildfires. The County recognizes that the Project Site is located within a Very High Fire Hazard Severity Zone, according to the California Department of Forestry and Fire Protection. Project impacts related to wildfire are discussed in Section 3.10, *Hazards and Hazardous Materials*, beginning on page 3-21 of the Draft SEIR and Section 3.21, *Wildfire*, beginning on page 3-77 of the Draft SEIR. Please refer to Master Response 6 and Master Response 7.

Response to Comment 43-3:

This comment expresses concern about crime in the vicinity of the Gardens. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Response to Comment 43-4:

This comment provides anecdotal statements relating to noise, parking, and traffic congestion within the neighborhood. Parking is discussed in Section 2.2.3, *Special Use Events*, on page 2-4 of the Draft SEIR and Section 2.4.5, *Parking*, beginning on page 3-29 of the Draft SEIR. Please refer to Master Response 2 and Master Response 3.

Parking and traffic impacts associated with the Proposed Project are discussed in Section 4.18, *Transportation*, beginning on page 3-61 of the Draft SEIR. The County has also prepared a site-specific traffic impact assessment for the Proposed Project which is included as Appendix F of the Draft SEIR. Please refer to Master Response 1.

Noise impacts from the Proposed Project are discussed in Section 3.14, *Noise*, beginning on page 3-29 of the Draft SEIR. The County has also prepared a site-specific noise impact study, which is included as Appendix E of the Draft SEIR. Please refer to Master Response 4 and Master Response 5.

Response to Comment 43-5:

The commenter expresses concern for emergency access to the Project Site. Project impacts related to emergency access are discussed in Section 3.10, *Hazards and Hazardous Materials*, beginning on page 3-21 of the Draft SEIR and Section 3.21, *Wildfire*, beginning on page 3-77 of the Draft SEIR. Please refer to Master Response 6 and Master Response 7.

Response to Comment 43-6:

This comment expresses concern for issues in the County including crime, vandalism, medical access, gun control, and homelessness. These issues are outside the scope of environmental issues required to be analyzed in a Draft SEIR and thus, no response is required.

Letter 44 - Connie Ching - August 15, 2022

Dear Ms. Jui Ing Chien,

As a fellow of the Virginia Robinson Gardens, I'm writing to you to please allow the gardens to expand their hours and increase the number of events (hours & days) for families, school children and working people may attend together and increase the fundraising ability of the friends of VRG.

Sincerely
Connie Ching

Aug. 2022

44-1

SANTA CLARITA CA 913

11 AUG 2022 PM 1 L



Ms. Jui Ing Chien
County of LA Department of
Parks & Recreation
1000 S. Fremont Ave.
Unit #40 A-9 West 3rd Floor

91803-667340

Alhambra CA 91803

Responses to Letter 44 – Connie Ching

Response to Comment 44-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 45a - Roxanne Heptner - August 16, 2022

From: Rox <rox@parcandpearl.com>
Sent: Tuesday, August 16, 2022 3:37 PM
To: Jui Ing Chien
Cc: firstdistrict@bos.lacounty.gov; hollyjmitchell@bos.lacounty.gov; Sheila; fourthdistrict@bos.lacounty.gov; kathryn@lbos.lacounty.gov; Fesia@ceo.lacounty.gov; ttway@beverlyhills.org; cchen@beverlyhills.org; kathy@checchi.org
Subject: Robinson Estate
Attachments: Roxanne Heptner Robinson Estate Issue letter.pdf; fire letter.pdf

CAUTION: External Email. Proceed Responsibly.

Dear Jui Ing Chien,

Please see attached letters, for your consideration.

Thank you!

Roxanne Heptner
1031 Cove Way
Beverly Hills, CA 90015

45a-1

Responses to Letter 45a – Roxanne Heptner

Response to Comment 45a-1:

The email from this commenter includes two attached letters, provided below as Letter 45b and Letter 45c below. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required.

Letter 45b - Roxanne Heptner - August 16, 2022

December 8, 2021

Julie Yom, AICP, Park Planner
County of Los Angeles
Department of Parks and Recreation
1000 S. Fremont Ave.
Unit #40 A-9 West, 3rd Floor
Alhambra, California 91083

Dear Julie,

I am writing you regarding the proposal to expand the Robinson estate in Beverly Hills. If this proposal were to move forward it would ruin the tranquility for every resident north of Sunset Blvd. Noise pollution would affect every resident in the canyons as noise carries far beyond the immediate area. We live in a very restricted parking city already; home construction is at an all-time high with vehicles lined up every street. Where would the availability for parking happen? Congestion in the area already is dense during the commute hours; with both canyons, Benedict and Coldwater having an overflow impact of traffic in the immediate area. To add to congestion will be intolerable. Property values will be affected as this increase in congestion and noise pollution will have a serious impact to the community. Beverly Hills will be the one to absorb the loss not Los Angeles.

I doubt that Mrs. Robinson's intention was to see her beautiful estate disrupt this area for commerce. I ask that you respect our neighborhood and keep it as is and search for other avenues of income.

Respectfully



Roxanne Heptner
1031 Cove Way
Beverly Hills, CA 90210

45b-1

Responses to Letter 45b – Roxanne Heptner

Response to Comment 45b-1:

Thank you for your comment. This comment includes a letter that was previously sent to the County on December 8, 2021 during the scoping period for the Draft SEIR. The letter expresses concerns for noise, traffic congestion, and parking, all of which were analyzed in the Draft SEIR.

Parking is discussed in Section 2.2.3, *Special Use Events*, on page 2-4 of the Draft SEIR and Section 2.4.5, *Parking*, beginning on page 3-29 of the Draft SEIR. Please refer to Master Response 2 and Master Response 3.

Traffic impacts associated with the Proposed Project are discussed in Section 4.18, *Transportation*, beginning on page 3-61 of the Draft SEIR. The County has also prepared a site-specific traffic impact assessment for the Proposed Project which is included as Appendix F of the Draft SEIR. Please refer to Master Response 1.

Noise impacts from the Proposed Project are discussed in Section 3.14, *Noise*, beginning on page 3-29 of the Draft SEIR. The County has also prepared a site-specific noise impact study, which is included as Appendix E of the Draft SEIR. Please refer to Master Response 4 and Master Response 5.

As such, the analysis requested by the commenter has been provided in the Draft SEIR (as noted above) and no further response is required.

Letter 45c - Roxanne Heptner - August 16, 2022

Ms. Jui Ing Chien
Park Planner
County of Los Angeles
Department of Parks and Recreation
1000 S. Fremont Ave.
Unit #40 A-9 West, 3rd Floor
Alhambra, CA 91083

Dear Ms. Chien,

We believe there are many deficiencies in the Draft Supplemental Environmental Impact Report (DSEIR), including traffic, parking, water, safety, but the purpose of this letter is to alert the County to one huge deficiency – the discussion of Fire Hazards and Emergency response.

FIRES

The neighborhood around the Virginia Robinson Gardens (the Gardens) has recently been declared an Extreme Fire Hazard Area, and many residents of the area had their home and property insurance raised significantly or canceled completely.

Yet, the Draft SEIR glosses over this important issue. Specifically, the DSEIR states:

“3.21.1 There has not been a wildland fire of any significance in Beverly Hills, and the last large wildland fire adjacent to the city occurred in Franklin Canyon more than 50 years ago”

This is inaccurate.

The DSEIR fails to discuss the Bel-Air Fire of 1961. Bel Air is just a few miles west of Beverly Hills. The Bel Air Fire was a disaster that began as a construction debris fire on November 6, 1961 in the Bel Air Community of Los Angeles. The fire destroyed 484 homes and burned 6,090 acres. At least 200 firemen were injured. This fire moved so quickly and burned so out of control that children were at The John Thomas Dye school that day and then evacuated by noon. By that evening, The John Thomas Dye School had burned to the ground. Much of the difficulty in fighting that fire came from the narrow streets and limited access in Bel Air.

The DSEIR also fails to discuss the Getty Fire of 2019 which burned 745 acres in Los Angeles. Thousands of people were evacuated during this fire and schools were closed. 10 homes were destroyed, and 15 residences were damaged.

Wildfire is a real hazard for Beverly Hills. The Gardens are particularly prone to fire for several reasons. There is a palm grove and palm trees are notorious for sending embers once ignited. Also, more importantly, access to the Gardens is very limited.

EMERGENCY RESPONSE

The DSEIR failed to discuss the important fact that Beverly Hills Fire Department vehicles (fire trucks, ambulances and rescue vehicles) do not have access to the Garden property. First responders can only access the Garden on foot. A building overhang on the property blocks access to the property by rescue and emergency vehicles. because of the overhang in the parking lot, no fire trucks or emergency vehicles can access the property.

45c-1

45c-2

Note, the six-acre property is undulated, and some areas have limited, uneven pathways compounding an emergency response. This limitation has the potential to delay a critical rescue as well as delay transport to hospital facilities especially when rescue personnel have access limitations.

The fire risk at the Gardens presents another unique concern. According to the County staff a pressurized fire hydrant exists in the front of the Gardens' grounds. The City Fire Marshall, however, failed to indicate knowledge of this hydrant. In the event of a serious fire, however, additional fire hydrants may be needed. Any backup hydrant would need to extend considerable distances, possibly even from Carolyn Way, Cove, and/or Crescent. The nearest fire hydrant appears to be at 1017 Crescent Drive, a considerable distance from the entrance to the Gardens. This fact will again complicate and delay any response to a fire emergency at the Gardens, perhaps even threaten historic features of the property and potentially spread fire to nearby residences. Any concern for the safety of visitors and staff compels rules and operational procedures which account for the safety limitations of the property. The DSEIR fails to address this critical concern.

45c-2
cont.

SPECIAL EVENTS

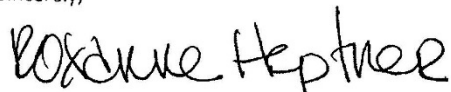
Special Events will require set up on the property, since there is no kitchen or catering facilities. The DSEIR also talks about setting up additional lighting and sound systems. Not only will these require many people entering the Gardens to set up and take down, in addition to the attendees at the Special Events, but there is also a known risk that catering facilities, lighting and sound systems malfunction and present a new threat of fire.

45c-3

As residents of Beverly Hills, we believe that the risk of Fire and Emergency is a critical adverse impact which the County DSEIR has completely ignored.

45c-4

Sincerely,



Roxanne Heptner
1301 Cove Way
Beverly Hills, CA 90210

Responses to Letter 45c – Roxanne Heptner

Response to Comment 45c-1:

The commenter believes the Draft SEIR does not sufficiently analyze parking, traffic, water resources, and safety issues. However, the commenter does not raise specific comments on these environmental issues; therefore, no further response is required or provided.

The commenter states that the Draft SEIR fails to analyze for the 1961 Bel Air Fire and 2019 Getty Fire in the City of Los Angeles. The County recognizes that the Project Site is located within a Very High Fire Hazard Severity Zone, according to the California Department of Forestry and Fire Protection. While these specific wildfires were not referenced in the Draft SEIR, their inclusion would not change the Draft SEIR's conclusion of less-than-significant impacts. Project impacts related to wildfire are discussed in Section 3.10, *Hazards and Hazardous Materials*, beginning on page 3-21 of the Draft SEIR and Section 3.21, *Wildfire*, beginning on page 3-77 of the Draft SEIR. Please refer to Master Response 6 and Master Response 7.

Response to Comment 45c-2:

The commenter expresses concern for emergency access to the Project Site. Emergency access is discussed in Section 3.10, *Hazards and Hazardous Materials*, beginning on page 3-21 of the Draft SEIR and Section 3.21, *Wildfire*, beginning on page 3-77 of the Draft SEIR. Please refer to Master Response 6 and Master Response 7.

The commenter also claims that no fire hydrant exists in the front of the Gardens. This statement is incorrect, as a pressurized fire hydrant is located at the northern end of the Elden Way cul-de-sac, left of the main entrance to the Gardens. Additional fire hydrants in the vicinity are located at 1020 Cove Way, 1032 Cove Way, and 1035 Carolyn Way.

As such, the analysis requested by the commenter has been provided in the Draft SEIR (as noted above) and no further response is required.

Response to Comment 45c-3:

The commenter is concerned about the threat of wildfires caused by catering facilities, lighting, and sound equipment associated with Special Use Events. Project impacts related to wildfire are discussed in Section 3.10, *Hazards and Hazardous Materials*, beginning on page 3-21 of the Draft SEIR and Section 3.21, *Wildfire*, beginning on page 3-77 of the Draft SEIR. Please refer to Master Response 6 and Master Response 7.

The Proposed Project would comply with all applicable City codes and regulations pertaining to emergency response and evacuation plans maintained by the police and fire departments in the City of Beverly Hills. As such, the analysis requested by the commenter has been provided in the Draft SEIR and no further response is required.

Response to Comment 45c-4:

This comment asserts that the County has “completely ignored” emergency access and wildfire concerns associated with the Proposed Project. In fact, both topics are specifically discussed in Section 3.10, *Hazards and Hazardous Materials*, beginning on page 3-21 of the Draft SEIR and Section 3.21, *Wildfire*, beginning on page 3-77 of the Draft SEIR. Please refer to Master Response 6 and Master Response 7. As such, the analysis requested by the commenter has been provided in the Draft SEIR and no further response is required.

Letter 46 - Roxanne Heptner - August 17, 2022

August 17, 2022

Ms. Jui Ing Chien
Park Planner
County of Los Angeles
Department of Parks and Recreation
1000 S. Fremont Ave.
Unit #40 A-9 West, 3rd Floor
Alhambra, CA 91083

Dear Ms. Chien,

I live at 1031 Cove Way, directly behind the Robinson's estate. I attended the last two meeting and I was surprised by how the language changed so drastically. Compromise, concerns and compassion was at the first one I attended. "We can and will change any ordinance that stands in our way". We can rewrite them "for the greater good", seemed to be your mantra at this last meeting. Our concerns were no longer your concerns. What happened to us? We matter, we are the people who will have to adjust or move.

46-1

Noise travels in the canyons, beyond the immediate area and the increase of events will bring loud music to the area, yet you don't address this. Living across the street, I have had to shut all windows and doors. For four events a year this was tolerable, but for 24 events this will be intolerable.

46-2

We live with the threat of fire daily, especially now that our water has been drastically reduced. The locals are aware of this threat but will the others be as concerned?

46-3

We the residents live with traffic congestion daily as was are wedged between two canyons, Benedict and Coldwater. The intersections of Hartford & Benedict and Lexington & Hartford are lined daily with bumper to bumper traffic. The intersection of Lexington and Hartford is so congested it is impossible to get to Cove Way without joining in the line of cars. Your SEIR report concludes that only Elden way will be impacted, this is physically not true. Crescent, Elden and Lexington is an extremely congested intersection due to the hotel on Crescent.

46-4

I, along with the local residents agree on some increase programs, especially those for children. I cannot agree to 24 additional events. Compromise is needed.

46-5

If this was you, and not me in this situation, how would you feel? The county will ruin the tranquility and safety we have in order to increase revenue for the county,

What was the original intent of Mrs. Robinson? Not this.

Regards,



Roxanne Heptner

Responses to Letter 46 – Roxanne Heptner

Response to Comment 46-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues. This comment provides introductory material from the commenter, including the fact that they are a neighbor to the Project Site. The commenter attended the public meetings held by the County on November 15, 2021 and August 10, 2022. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required.

Response to Comment 46-2:

The commenter states that Proposed Project would bring additional noise to the neighborhood, beyond the immediate Project Site. The commenter also claims that the Draft SEIR did not address this phenomenon. As described in Section 3.14 *Noise* and Appendix E of the Draft SEIR, the site-specific noise impact assessment was prepared for the Proposed Project. Please refer to Master Response 4 and Master Response 5.

As such, the analysis requested by the commenter has been provided in the Draft SEIR (as noted above) and no further response is required.

Response to Comment 46-3:

The commenter expresses concern for the threat of wildfires. Project impacts related to wildfire are discussed in Section 3.10 *Hazards and Hazardous Materials* and Section 3.21 *Wildfire* of the Draft SEIR. Please refer to Master Response 6 and Master Response 7.

Response to Comment 46-4:

The commenter states that the intersections of Hartford Way and Lexington Road, and Benedict Canyon Drive and Hartford Way are “lined daily with bumper to bumper traffic.” The Draft SEIR included a site-specific Traffic Impact Assessment, which analyzed Project impacts to roadways and intersections in the neighborhood surrounding the Gardens. The Project study area included eight study intersections located along the primary access routes to and from the Project Site, including the two intersections outlined by the commenter (refer to Figure 3-5 of the Draft SEIR).

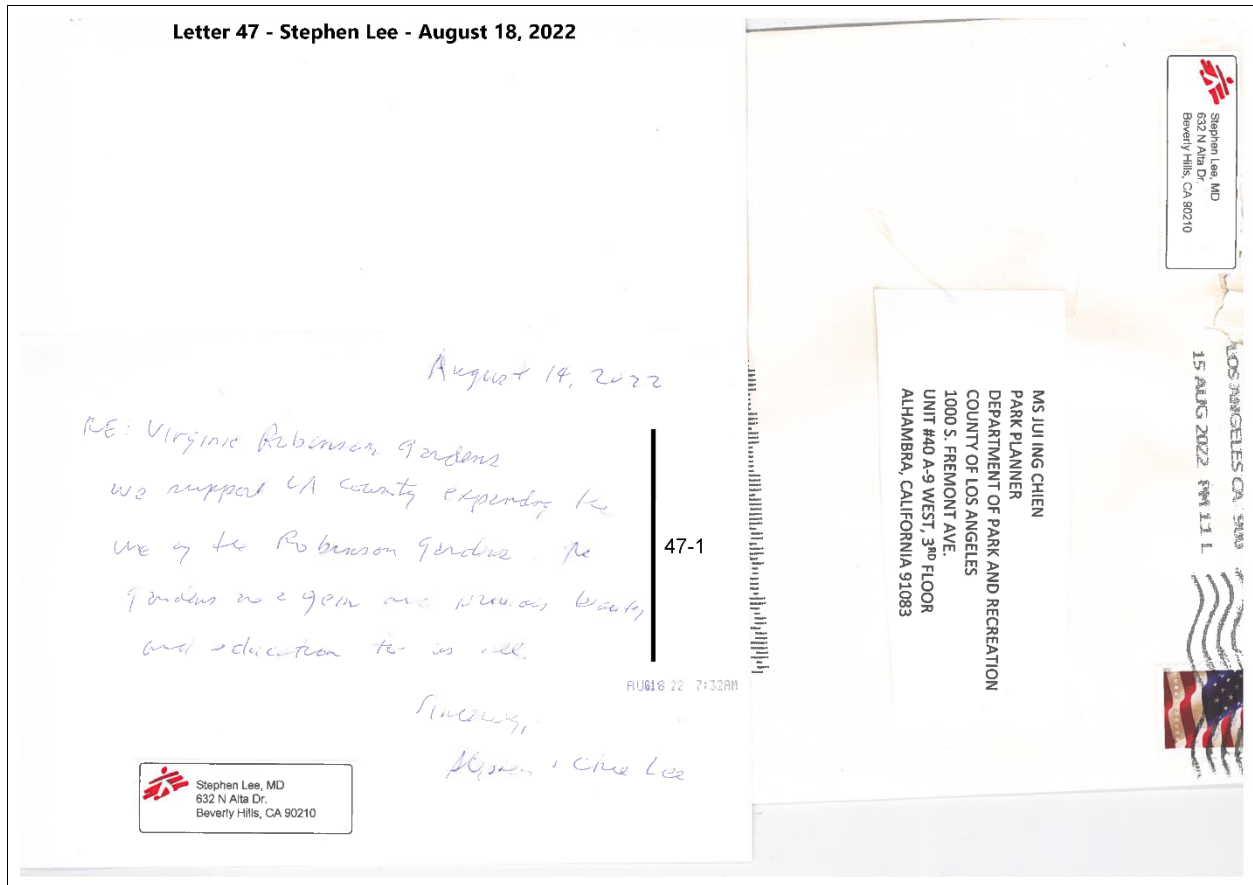
The Traffic Impact Assessment determined that Proposed Project would not substantially affect local traffic circulation and access at the analyzed study intersections, based on a review of study area mobility conditions, per requirements of the City traffic study guidelines.

As such, the analysis requested by the commenter has been provided in the Draft SEIR (as noted above) and no further response is required.

Response to Comment 46-5:

The commenter expresses support for the Gardens' educational programs but opposes the increase in Special Use Events. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Proposed Operational Changes at the
Virginia Robinson Gardens
Final Supplemental Environmental Impact Report



Responses to Letter 47 – Stephen Lee

Response to Comment 47-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 48 - Stacy Klines - August 19, 2022

From: Stacy Klines <jcksmama@sbcglobal.net>
Sent: Friday, August 19, 2022 11:05 AM
To: Jui Ing Chien
Subject: Please support the proposed changes for Virginia Robinson Gardens

CAUTION: External Email. Proceed Responsibly.

Dear Honorable Board of Supervisors:

I am writing in support of the modification of the hours, days and number of special use events at Virginia Robinson Gardens. The change in operations at the Virginia Robinson Gardens will create new public benefits and further the Mission of the Gardens:

1. Allowing the Gardens to be open from 9:30am to Sunset seven days a week gives the public it serves greater access
2. Will give the renowned Children's Science Education Program & tours for local and Title One school children more flexibility to attend and allow the program to reach more children
3. Allow more adult education classes promoting environmental sustainability and lectures to be offered to the public
4. More days and hours open benefit the public by making it accessible to families on weekends and after work
5. Making the Gardens available for private rental on a limited basis helps the Gardens to be less dependent on taxpayer dollars. This is a standard operation for County and City facilities such as LACMA, The Wallis, Descanso Gardens and other parks and gardens, etc.
6. Give the public more access to an amazing national registry landmark/museum that celebrates an important aspect of the history of Beverly Hills

Sincerely,
Stacy Klines
2400 Bowmont Drive
Beverly Hills, California

Sent from Stacy's iPad

48-1

Responses to Letter 48 – Stacy Klines

Response to Comment 48-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 49 - Mark Kines - August 19, 2022

From: Mark Tapio Kines <mark@cassavafilms.com>
Sent: Friday, August 19, 2022 11:52 AM
To: Jui Ing Chien
Subject: Expanding hours for Virginia Robinson Gardens

CAUTION: External Email. Proceed Responsibly.

Dear Ms. Chien and the Honorable Board of Supervisors,

I've been a volunteer docent and gardener at Virginia Robinson Gardens (VRG) for two and a half years now. I understand that there is a desire to expand the opening hours of this county park from 9:30am until sunset daily. I want to make it clear that I fully support this position.

I have promoted VRG on social media and have received backlash for the gardens not being open on weekends, preventing "regular folks" with Monday-to-Friday jobs from coming for tours. Earlier in 2022, we were finally allowed to reopen for Saturday tours after a five-year moratorium. I now lead a lot of my tours on Saturdays, and I'm thrilled that people who are unable to get to these beautiful gardens during weekdays can finally explore them with me. But we can do better. Sundays we are still closed. And of course we close at 4pm every day, which is too early for the summer months.

I hope the County Board of Supervisors understands that VRG, as a county park, needs to be more accessible to people of the county. Expanding tour hours and allowing for more public usage of the space is simply the right thing to do.

Sincerely,
Mark Tapio Kines
310-365-7684

49-1

Responses to Letter 49 – Mark Klines

Response to Comment 49-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 50 - Laura Haddad - August 19, 2022

From: laura haddad <lauramoet@yahoo.com>
Sent: Friday, August 19, 2022 11:58 AM
To: Jui Ing Chien
Subject: Virginia in Robinsons Gardens

CAUTION: External Email. Proceed Responsibly.

Hello, I wanted you to know I became a member of Virginia Robinson's Gardens about a year ago. Have thoroughly enjoyed the grounds going to some of the classes and being a member of the book club. I think it would be so beneficial to all if the park hours can be extended longer hours open weekends for everyone to take advantage of this beautiful property. Also more private events available for rentals by people so they can have special events which I would like to do myself. I live in Studio City at 3947 Carpenter Ave., Studio City, CA. Thanks Laura Haddad

50-1

Sent from my iPhone

Responses to Letter 50 – Laura Haddad

Response to Comment 50-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 51 - Regina Drucker - August 19, 2022

Lindsay Liegler

From: Regina Drucker <reginadrucker@sbcglobal.net>
Sent: Friday, August 19, 2022 12:01 PM
To: Jui Ing Chien
Cc: info@robinsongardens.org
Subject: Virginia Robinson Gardens

CAUTION: External Email. Proceed Responsibly.

Dear Honorable Board of Supervisors,

With great HOPE I ask for assistance in helping The Virginia Robinson Gardens aka VRG, become a Beacon of Welcome everyday, as well too allow expansion of its use with paid Private Events to offset taxpayers dollars. This Cherished Home & Garden is equal with the nearby Huntington Library, Art Museum and Botanical Gardens.

VRG is of a 'Lost Golden Age of Glamour and Charity' in early Los Angeles, nestled magnificently in the Crown of Beverly Hills.

VRG is requesting modification to allow a further depth of Education for the Public, and access to this rare Reality. A Fantastical Journey begins when one steps within its walls, and one is whisked away in the Home & Gardens, built by the Robinson Family. Historical and Grand, the Gardens rival Lotusland and Bellosguardo- the Clark Estate, both in Santa Barbara!

Sincerely,

Regina Drucker

Sent from my iPhone

51-1

Responses to Letter 51 – Regina Drucker

Response to Comment 51-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 52 - Lewis Perkins - August 19, 2022

From: Lewis Perkins CFP® CLU® <lewisperkins@comprehensivefinancial.net>
Sent: Friday, August 19, 2022 4:19 PM
To: Jui Ing Chien
Subject: As a docent....

CAUTION: External Email. Proceed Responsibly.

Ms. Jui Ing Chien, Park Planner
County of LA Department of Parks & Recreation
1000 S. Fremont Ave., Unit #40 A-9 West, 3rd Floor
Alhambra, CA 91083

I've been a docent doing tours of Robinson Gardens in Beverly Hills through the seasons. Each person who saunters through the gardens and structures is filled with a joy from the fresh view and elaborate gardens. As well, there is a sense of history about California and the growth of the area appreciated by foreigners and out-of-state residents. Thank you for supporting their endeavor to expand use of the facility for more to enjoy & learn.

Regards,

Lewis Perkins

Financial Services, CFP® MBA CLU®
Comprehensive Financial Solutions, Inc.
www.ComprehensiveFinancial.net
LewisPerkins@ComprehensiveFinancial.net

(310) 453-2121 - office	1102 Aviation Blvd., Suite B
(310) 801-8198 - mobile	Hermosa Beach, CA 90254
(310) 453-9121 - fax	Mail: PO Box 3389 Santa Monica, CA 90408



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52-1

Responses to Letter 52 – Lewis Perkins

Response to Comment 52-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 53 - Worthy McCartney - August 20, 2022

From: MCCARTNEY Worthy (CAR-US) <worthy.mccartney@cartier.com>
Sent: Saturday, August 20, 2022 7:27 AM
To: Jui Ing Chien
Subject: Your kind action needed for Virginia Robinson's gardens

CAUTION: External Email. Proceed Responsibly.

Dear Ms Chien,

Please see below my request for the Virginia Robinson's Gardens in Beverly Hills:

1. Please allow the Gardens to be open from 9:30am to Sunset seven days a week gives the public it serves greater access
2. Being open more will give the renowned Children's Science Education Program & tours for local and Title One school children more flexibility to attend and allow the program to reach more children
3. In addition, allow more adult education classes promoting environmental sustainability and lectures to be offered to the public
4. More days and hours open benefit the public by making it accessible to families on weekends and after work
5. Making the Gardens available for private rental on a limited basis helps the Gardens to be less dependent on taxpayer dollars. This is a standard operation for County and City facilities such as LACMA, The Wallis, Descanso Gardens and other parks and gardens, etc.
6. This also gives the public more access to an amazing national registry landmark/museum that celebrates an important aspect of the history of Beverly Hills

Thank you,
Worthy McCartney
1255 South Orange Grove Blvd, #4
Pasadena, CA 91105
Sent from my iPhone

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Responses to Letter 53 – Worthy McCartney

Response to Comment 53-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 54 - Bryan and Wendy Turner - August 20, 2022

From: lawendyt <wendy@turner6.com>
Sent: Saturday, August 20, 2022 6:14 PM
To: Jui Ing Chien
Cc: firstdistrict@bos.lacounty.gov; hollyjmitchell@bos.lacounty.gov; Sheila; fourthdistrict@bos.lacounty.gov; Barger, Kathryn; Fesia Davenport; ttway@beverlyhills.org; cchen@beverlyhills.org
Subject: Virginia Robinson Gardens

CAUTION: External Email. Proceed Responsibly.

Dear J. Chien,

As residents in the neighborhood, are vehemently opposed to the Virginia Robinson Gardens proposed changes to their operations.

While we are supportive of the Gardens mission, it should not come at our expense.

Whatever the findings of the Supplemental Environmental Report that is being prepared shows, these changes are outrageous and threaten our right to the quiet enjoyment of our homes.

The Gardens already disregards the parking laws, and the Elden Way no parking restrictions as well as the Crescent Drive restrictions. They allow visitors and event trucks to take over on a regular basis despite that being prohibited, and routinely block our driveways cutting off access to our home and our own guests for parking.

There are times when emergency vehicles would not be able to get through. We do not want to have a tragedy occur because the Gardens were not interested in following safety protocols.

These proposed changes are alarming. They essentially change the Gardens into a commercial venue, and will completely ruin the fabric of our neighborhood.

In the face of resident opposition, the Gardens already expanded outside of their original scope in 2014. This cannot be allowed to happen again.

While the current situation is bad enough, these changes significantly threaten our safety, our security, and our way of life and ultimately the value of our homes.

We respectfully request that the County and Gardens abandon their pursuit of this expansion.

Yours Sincerely,

Bryan and Wendy Turner

54-1

54-2

54-3

Responses to Letter 54 – Bryan and Wendy Turner

Response to Comment 54-1:

Thank you for your comment. This comment provides introductory material from the commenter, including the fact that they are a neighbor to the Project Site. The commenter expresses support for mission of the Gardens, but opposition to the proposed operational changes. However, the commenter does not raise a specific environmental issue; therefore, no further response is required or provided.

Response to Comment 54-2:

The commenter states that guests often disregard parking restrictions in the surrounding neighborhood. Parking is discussed in Section 4.11, *Land Use*, on page 3-77 of the Draft SEIR and Section 4.18, *Transportation*, on page 3-69 of the Draft SEIR. Please refer to Master Response 2 and Master Response 3.

Project impacts related to emergency access are discussed in Section 3.10, *Hazards and Hazardous Materials*, beginning on page 3-21 of the Draft SEIR and Section 3.21, *Wildfire*, beginning on page 3-77 of the Draft SEIR. Please refer to Master Response 6 and Master Response 7.

Response to Comment 54-3:

These comments express opposition to the proposed operational changes. As these comments are not direct comments on the content or adequacy of the Draft SEIR and do not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 55 - Melody Reinstein - August 22, 2022

From: [Patricia Reinstein](#)
To: [Jui Ing Chien](#)
Cc: [Patricia Reinstein](#)
Subject: Robinson Gardens modifications
Date: Monday, August 22, 2022 9:19:50 AM

CAUTION: External Email. Proceed Responsibly.

To the Honorable Board of Supervisors,

I am writing in support of the modification of the days, hours and special use events at Virginia Robinson Gardens. As a working mom who does not live close by, the restricted hours make it difficult to be able to visit with my children. Parks are so important to our well-being in the stressful environment we live in today. Being open 7 days a week would allow families to visit this beautiful estate when they are not working on weekends.

I think that it would be a benefit to the taxpayers to allow private rentals to be expanded to bring in funds for maintenance and upkeep of this beautiful place. Other parks in the system do this like The Wallis and Descanso Gardens to mention a few.

Please vote yes to expand use and hours of this historic home and garden.

Sincerely,

Melody Kulp Reinstein

575 Almoloya Dr.

Pacific Palisades, Ca 90272

55-1

Responses to Letter 55 – Melody Reinstein

Response to Comment 55-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 56 - David Reinstein - August 22, 2022

From: Patricia Reinstein <preinstein@me.com>
Sent: Monday, August 22, 2022 9:23 AM
To: Jui Ing Chien
Cc: Patricia Reinstein
Subject: Virginia Robins Gardens

Follow Up Flag: Follow up
Flag Status: Flagged

CAUTION: External Email. Proceed Responsibly.

Honorable Board of Supervisors,

I urge you to support the modification in hours, days, and number of special use events for Virginia Robinson Gardens. This gem is in the middle of Beverly Hills. Its beauty also provides a public health benefit with its acres of trees and plants.

They have many education classes that benefit the public in learning about environmental issue that affect all of us in today's world. Longer hours provide opportunities for the public to visit after work or on weekends.

They also do wonderful work with their Children's Science Outreach Program sent to Title I schools across Los Angeles. They also offer a Science Fair to children from group homes in LA County.

I would urge you to allow more availability for private rental events. Other parks, gardens and public venues in LA are allowed many rentals and they may not need to be so dependent on the taxpayers.

I urge you to expand public use of this beautiful and historic national landmark.

Respectfully,

David C. Reinstein

575 Almoloya Drive

56-1

Responses to Letter 56 – David Reinstein

Response to Comment 56-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 57 - Patricia Reinstein - August 22, 2022

From: Patricia Reinstein <preinstein@me.com>
Sent: Monday, August 22, 2022 9:25 AM
To: Jui Ing Chien
Cc: Patricia Reinstein
Subject: Changes to operation of Robinson Gardens

Follow Up Flag: Follow up
Flag Status: Flagged

CAUTION: External Email. Proceed Responsibly.

Dear Honorable Board of Supervisors,

As a resident of Los Angeles County, I stand in favor of the modification of the hours, days and number of special use events at Virginia Robinson Gardens. These changes will be of benefit to visitors who cannot visit during current hours. In this tumultuous time, everyone needs to feed their soul with more access to this wonderful garden. It was Mrs. Robinson's intent to make the garden available to the public, especially families who are more likely to visit after work hours or on weekends.

I have attended education classes that promote sustainability. I have visited with my grandchildren who learned from docent led tours about kitchen gardens, where the variety of plants come from that are found there. Children's tours are often given to Title 1 schoolchildren who greatly benefit from the fresh clean air and learn how to plant their own gardens when possible.

The rich history celebrates the early days of Beverly Hills and its founders.

Sincerely,

Patricia A. Reinstein

1409 Benedict Canyon Drive

Beverly Hills, CA 90210

57-1

Responses to Letter 57 – Patricia Reinstein

Response to Comment 57-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 58 - Amanda & Josh Van Dyk - August 22, 2022

From: Amanda Van Dyk, DPT <info@manualtherapyla.com>
Sent: Monday, August 22, 2022 9:50 AM
To: Jui Ing Chien
Subject: Re Robinson gardens

Follow Up Flag: Follow up
Flag Status: Flagged

CAUTION: External Email. Proceed Responsibly.

Dear Honorable Board of Supervisors:

I am writing in support of the modification of the hours, days and special use events at Virginia Robinson Gardens because they will create new public benefits and further the Mission of the Gardens:

1. Allowing the Gardens to be open from 9:30am to Sunset seven days a week gives the public it serves greater access
2. Will give the renowned science program & tours for local & Title One school children more flexibility to attend and allow the program to be expanded
3. Allow more adult education classes promoting environmental sustainability and lectures to be offered to the public
4. More days and hours open benefit the public by making it accessible to families on weekends and after work
5. Making the Gardens available for private rental on a limited basis helps the Gardens to be less dependent on taxpayer dollars. This is a standard operation for County and City facilities such as LACMA, The Wallis, various parks and gardens, etc.

Thank you so much!

Sincerely

Amanda and Josh Van Dyk

5061 Haskell Ave Encino CA 91436

--
Amanda Van Dyk, DPT
Doctor of Physical Therapy
Concierge Physical Therapist

Responses to Letter 58 – Amanda and Josh Van Dyk

Response to Comment 58-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 59 - Gary Gartsman - August 22, 2022

Ms. Jui Ing Chien, Park Planner
County of LA Department of Parks & Recreation
1000 S. Fremont Ave., Unit #40 A-9 West, 3rd Floor
Alhambra, CA 91083

My Robinson Gardens' experiences have been wonderful and I write only to help improve this magnificent resource.

I visited Robinson Gardens several times over the years but now that I am retired I plan on visiting more frequently.

I was surprised to learn that the Robinson Gardens hours are so restrictive. I live close to the property and would like to visit "as the spirit moves me" rather than arrange a tour in advance. A reservation or appointment time sheet for online bookings would allow greater access to individuals (or groups) yet maintain appropriate crowd control so important in the aesthetic experience.

Although I personally have time during the work week if we are to encourage the widest audience participation, weekend hours are necessary. Access only during the week penalizes so many workers and their families.

I admire gardens in general but I feel that more adult education would increase my appreciation. I want to move beyond the "aren't those pretty" stage.

I was born in Los Angeles and attended Beverly School schools (El Rodeo '64, BHHS '68). I am proud of Beverly Hills and the important role Robinson Gardens has played in my city's history. I wish more people were aware of this relationship.

I trust you will take this letter in the spirit in which it was written. These are comments and ideas from a concerned citizen whose goal is improving a truly magnificent venue.

Sincerely,

Gary Gartsman
11667 Moraga Ln.
Los Angeles, CA
90049
ggartsman@gmail.com

59-1

Responses to Letter 59 – Gary Gartsman

Response to Comment 59-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 60 - Fred Reinstein - August 22, 2022

From: Patricia Reinstein <preinstein@me.com>
Sent: Monday, August 22, 2022 1:43 PM
To: Jui Ing Chien
Cc: Patricia Reinstein
Subject: In support of modifications for Robinson Garden

Follow Up Flag: Flag for follow up
Flag Status: Flagged

CAUTION: External Email. Proceed Responsibly.

Dear Los Angeles County Board of Supervisors,

I am writing to support the changes in operating hours that would expand public hours of Virginia Robinson Gardens. Being open 7 days a week from 9:30 am to sunset provides the public greater access to this hidden jewel in the middle of Beverly Hills.

I have attend other charitable events held at this garden and it is an amazing venue. They should be allowed limited private rentals to help to defray costs to the taxpayers for restoration and renovation of this historic site. Robinson Garden is an important part of the history of the city of Beverly Hills. It is a public park and should be allowed to have parity with other public parks in LA County.

Sincerely,

Fred M. Reinstein

1409 Benedict Canyon Drive

Beverly Hills CA 90210

60-1

Responses to Letter 60 – Fred Reinstein

Response to Comment 60-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 61 - Jacie Jerde - August 22, 2022

From: Janice Jerde <jaj93@aol.com>
Sent: Monday, August 22, 2022 1:51 PM
To: Jui Ing Chien
Subject: Fwd: Robinson Gardens

Follow Up Flag: Flag for follow up
Flag Status: Flagged

CAUTION: External Email. Proceed Responsibly.

August 22, 2022

Dear Jui Ing Chien,

I am writing this letter in support of the Virginia Robinson Gardens ability to have more open hours.
I am an Architect who has had much pleasure sharing the Gardens & their History with other Professionals local and from around the World.
It is not only a Beautiful & Historic Place it also provides benefit to Adults and school age children through education.
I believe the school age children who have access to the Gardens are often able to see nature first hand as well as open their imaginations and teach them to dream for more.
There are many reasons to make this request.
Please consider this request which will benefit so many .

Sincerely,
Jaice Ambry Jerde AIA
364 North Bristol Avenue
Los Angeles, CA 90049

61-1

Responses to Letter 61 – Janice Jerde

Response to Comment 61-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 62 - Betsy Bosak - August 22, 2022

From: Betsy Bosak <betsbosak@aol.com>
Sent: Monday, August 22, 2022 1:53 PM
To: Jui Ing Chien
Subject: Robinson Garden

Follow Up Flag: Flag for follow up
Flag Status: Flagged

CAUTION: External Email. Proceed Responsibly.

I am writing in support of Robinson Garden in Beverly Hills. It is an excellent educational venue for those interested in horticulture, low water landscape, plants that are native To Southern California and much more. It's also a fabulous resource for those interested in Beverly Hills history. I have brought my grandchildren here who have loved wandering the numerous garden pathways. Please support the continuation of this wonderful resource

62-1

Betsy Bosak
1000 villa grove dr
Pacific palisades CA
90272

Sent from my iPhone

Responses to Letter 62 – Betty Bosak

Response to Comment 62-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 63 - Suzanne Kayne - August 22, 2022

August 19, 2022

Dear Honorable Board of Supervisors:

I am writing in support of the modification of the hours, days and number of special use events at Virginia Robinson Gardens. The change in operations at the Virginia Robinson Gardens will create new public benefits and further the Mission of the Gardens:

1. Allowing the Gardens to be open from 9:30am to Sunset seven days a week gives the public it serves greater access.
2. Will give the renowned Children's Science Education Program & tours for local and Title One school children more flexibility to attend and allow the program to reach more children.
3. Allow more adult education classes promoting environmental sustainability and lectures to be offered to the public.
4. More days and hours open benefit the public by making it accessible to families on weekends and after work.
5. Making the Gardens available for private rental on a limited basis helps the Gardens to be less dependent on taxpayer dollars. This is a standard operation for County and City facilities such as LACMA, The Wallis, Descanso Gardens and other parks and gardens, etc.
6. Give the public more access to an amazing national registry landmark/museum that celebrates an important aspect of the history of Beverly Hills.

63-1

Sincerely,



Suzanne Kayne
801 Woodacres Rd.
Santa Monica, CA 90402

Received in the mail on 8/22/22

Responses to Letter 63 – Suzanne Kayne

Response to Comment 63-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 64 - Adrienne Horwitch - August 22, 2022

From: Adrienne Horwitch <ashorwitch@aol.com>
Sent: Monday, August 22, 2022 2:57 PM
To: Jui Ing Chien
Subject: Virginia Robinson Gardens Support

CAUTION: External Email. Proceed Responsibly.

Dear Ms. Chien,

I have lived in Beverly Hills for almost 40 years and am a member of the Friends of Robinson Gardens. I urge you to support the proposed changes in operations at the Gardens because they will provide the community with more access to this beautiful landmarked County facility, and help broaden the range of programs the Friends offer to schools across the greater Los Angeles area. Especially to the Title 1 schools we work with in science education.

As our report points out, there is no new noise impact to the neighbors. And as we have always done in the past, we will apply all mitigations required for traffic and parking. Virginia Robinson Gardens has always required visitors to have a timed reservation, and that of course, will continue. The additional hours and allowed number of guests will be managed as before, with no disruption to the neighborhood.

Allowing the Virginia Robinson Gardens to stay open to sunset is the right thing to do. All Beverly Hills parks and gardens are open until sunset and most of them are in residential areas. This is the nature of green spaces in cities. Robinson Gardens acts as a buffer to development. It's trees and landscape are part of the ecosystem that helps to keep the air clean in the area.

Cars cannot park on Eldon Way, so there is no commotion from doors opening and closing, or engines idling. School buses may not drop off at the Gardens and the children walk in quiet single file to the property.

Please consider all the good and value these changes can bring. I appreciate you taking the time to read my letter of support for Virginia Robinson Gardens.

Thank you,
Adrienne Horwitch

64-1

Responses to Letter 64 – Adrienne Horwitch

Response to Comment 64-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 65 - Jeff Graham - August 22, 2022

From: Jeff Graham <jeff395n@gmail.com>
Sent: Monday, August 22, 2022 3:03 PM
To: Jui Ing Chien
Subject: Virginia Robinson Gardens

Follow Up Flag: Follow up
Flag Status: Flagged

CAUTION: External Email. Proceed Responsibly.

Dear Ms. Chien,

Virginia Robinson Gardens is a unique landmark that boasts seven distinct gardens and the largest king palm grove outside of Queensland, Australian.

I support the modification of the hours, days and number of special use events at Virginia Robinson Gardens. The change in operations at the Virginia Robinson Gardens will create new public benefits and further the Mission of the Gardens. Allowing this modification will give the public more access, with weekends and after work hours, to an amazing national registry landmark/museum that celebrates an important aspect of the history of Beverly Hills and increase opportunities for revenue - reducing dependency on public funds - via private rentals. The revised hours will also allow more adult education classes to provide guidance on environmental sustainability. Granting the modification will provide access to a garden unlike any other in our region.

Sincerely,

Jeff Graham

North Flores St., West Hollywood

65-1

Responses to Letter 65 – Jeff Graham

Response to Comment 65-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 66 - Jayne Wilson - August 22, 2022

From: Jayne Wilson <jaynewilson4@gmail.com>
Sent: Monday, August 22, 2022 3:14 PM
To: Jui Ing Chien
Subject: Virginia Robinson Gardens

CAUTION: External Email. Proceed Responsibly.

Dear Honorable Board of Supervisors,
I'm writing in support of the modification of the hours, days and number of special use events at Virginia Robinson Gardens. The change in operations at the Virginia Robinson Gardens will create new public benefits and further the Mission of the Gardens:

1. Allowing the Gardens to be open from 9:30am to Sunset seven days a week gives the public it serves greater access and will continue the history and legacy of an important landmark on the National Registry .
2. Will give the renowned science education program & tours for local and Title One school children more flexibility to attend and allow the program to reach more children
3. Allow more adult education classes promoting environmental sustainability and lectures to be offered to the public
4. Making the Gardens available for private rental on a limited basis helps the Gardens to be less dependent on taxpayer dollars. This is a standard operation for County and City facilities such as LACMA, The Wallis, Descanso Gardens and other parks and gardens, etc.
5. Give the public more access to an amazing national registry landmark/museum that celebrates an important aspect of the history of Beverly Hills.

Sincerely,
Jayne Wilson
Chantilly Road Los Angeles

--
Jayne Papac Wilson
Jayne Wilson Design
310-909-4770

66-1

Responses to Letter 66 – Jayne Wilson

Response to Comment 66-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 67 - Seeta Zieger - August 22, 2022

From: Seeta Zieger <szieger@tvone.tv>
Sent: Monday, August 22, 2022 4:05 PM
To: Jui Ing Chien
Subject: Robinson Gardens

CAUTION: External Email. Proceed Responsibly.

Dear Ms. Chien,

I am writing in support of the modification of the hours, days and number of special use events at Virginia Robinson Gardens. The change in operations at the Virginia Robinson Gardens will create new public benefits and further the Mission of the Gardens:

- Allowing the Gardens to be open from 930a- sunset seven days/week gives the public greater access to this amazing piece of Beverly Hills' (and California) history.
- I have learned so much about horticulture by attending docent led tours (Kate Oakland is amazing). This knowledge would be interesting and helpful to young and old!
- The Gardens could allow more educational classes- especially focused on sustainability and environmentally friendly landscaping tips.
- Making the Gardens available for private rentals on a vetted and limited basis would help the Garden become more fiscally independent. It is my understanding that many County & City facilities do the same (The Wallis, Descanso Gardens, LACMA, etc.)

The Virginia Robinson Gardens is truly one of LA County's hidden treasures.

Thank you for your consideration,

Best,
Ms. Seeta Zieger
Home address: 9230 Kinglet Dr. LA 90069

Seeta Zieger

VP, West Coast Advertising Sales & Marketing, Ad Sales and Marketing
O: 310.284.3725 C: 646.708.5663
1800 Century Park East Suite 600, Los Angeles, CA 90067

67-1

Responses to Letter 67 – Seeta Zieger

Response to Comment 67-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 68 - Robert Sakatani - August 22, 2022

From: Sakatani, Robert <robert.sakatani@lausd.net>
Sent: Monday, August 22, 2022 4:07 PM
To: Jui Ing Chien
Subject: Letter of Support of the Virginia Robinson Gardens

CAUTION: External Email. Proceed Responsibly.

Dear Ms. Ms. Jui Ing Chien, Park Planner:

My name is Robert Sakatani, a third-grade teacher with the Los Angeles Unified School District at 186th Street Elementary School in Gardena. I am writing to you to ask for your support of the continued funding and operations of the Virginia Robinson Gardens in Beverly Hills.

This facility has been an invaluable resource for educating my students and their families for over three years. I continue my relationship and support of this Los Angeles County historic place because of their dedication to educating and enriching the lives of students who are from underserved, lower socio-economic communities in Los Angeles. During the start of the Pandemic, they provided over 150 Standards-based health and science kits for students to learn about the origin of their food and how to make healthier choices in their diets. The Friends of Virginia Robinson Gardens have provided bus stipends so my students can attend their field trip free of charge. The immaculate grounds of this historic estate open their eyes to the wonder of nature, the beauty of art, and the joy of travel.

It is my understanding that the Virginia Robinson Gardens is facing budget and operational cuts. This will be detrimental to the continuance and growth of their educational program. On the contrary, this well-managed facility could serve more of the community by extending their current hours so more students and their families can benefit from their programs. Extended hours of operations can allow them to offer classes that interest the public and the surrounding Beverly Hills community. The beautiful grounds could be used to hold fundraising events or rented for private events to offset their budgetary deficits.

In closing, it would be a shame if Los Angeles public officials were not in favor of bolstering their support of this important historic place that should be shared by all. This was the mission statement of the Robinson family.

Sincerely,

Robert Sakatani
25937 Oak St. Apt 26
Lomita, CA 90717
rls1226@gmail.com

68-1

Responses to Letter 68 – Robert Sakatani

Response to Comment 68-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 69 - Kerstin & George Royce - August 22, 2022

From: Kerstin Royce <kerstinroyce@gmail.com>
Sent: Monday, August 22, 2022 4:51 PM
To: Jui Ing Chien
Subject: Letter of support for the SEIR at The Virginia Robinson Gardens

CAUTION: External Email. Proceed Responsibly.

> Dear Honorable Board of Supervisors,
>
> My husband George and I have resided at 629 North Alta Drive for 50 years.
> We support the modification of the hours, days and special use events at the Virginia Robinson Gardens. This change will be of great benefit to the public, as that was Virginia's wishes when she gave her estate to the County of Los Angeles in 1977.
>
> There is a renowned Children's Science Education Program and tours at the Robinson Gardens, and the children are encouraged to bring their families to visits. Expanding visiting hours would allow children to attend and visit with their parents.
>
> More adult education classes would greatly serve the public, such as yoga, gardening, bee classes and water conservation as just a few examples.
>
> Making the gardens available for rentals on a limited basis helps the gardens to have financial stability and thus be less dependent on taxpayer dollars.
>
> And giving the public more access to this amazing national registry landmark/ museum benefits Beverly Hills as well as it will give support to local restaurants and shops.
>
> Respectfully, Kerstin and George Royce
>
> Sent from my iPad

69-1

Responses to Letter 69 – Kerstin and George Royce

Response to Comment 69-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 70 - Robin Blake - August 22, 2022

From: robin blake <one.tinkerbell@gmail.com>
Sent: Monday, August 22, 2022 6:17 PM
To: Jui Ing Chien
Subject: Supporting the expansion of opening hours for Virginia Robinson Gardens

CAUTION: External Email. Proceed Responsibly.

Dear Ms. Chien,

I am writing to express my support for the expansion of the opening hours and days at Virginia Robinson Gardens. Allowing the Gardens to be open from 9:30am to sunset seven days a week would be a great benefit to the public, making this amazing landmark accessible more people, including families on weekends and after work.

70-1

Robin Blake,
Friends of Robinson Gardens, Board of Directors - Liaison

Responses to Letter 70 – Robin Blake

Response to Comment 70-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 71 - Jodi and Don Stine - August 22, 2022

From: JODI STINE <jstine10022@gmail.com>
Sent: Monday, August 22, 2022 9:58 PM
To: Chloe Chen; cityclerk@beverlyhills.org; Jui Ing Chien
Cc: shelia@bos.lacounty.gov
Subject: Virginia Robinson Gardens

CAUTION: External Email. Proceed Responsibly.

I have already written and sent you an email concerning my OPPOSITION to the expansion of the Robinson Gardens hours and events. **I am a member of the Friends of Robinson Gardens and I OPPOSE these changes.**

71-1

However, as a member of the non-profit Friends of Robinson Gardens, I received **the email below (From Betty Goldstein -President) urging its members to write letters to the County and City with specific instructions of what to say.**

I wanted to bring this to your attention as it's very disconcerting that her letter is misleading and not accurate. The letter is meant to solicit letters from members in support of all the proposed changes to the operating covenants of The Robinson Gardens. However, the letter inaccurately states that the concerned neighbors are, "Those who oppose the Gardens and want to curtail its operations". **This is untrue and misleading. All of the neighbors support the Gardens and are only trying to limit its impact on the livability of our neighborhood.** These are substantial proposed changes (Increased operating hours and visitor counts as well as a 500% increase in the number of parties held each year). **In all of our meetings with the County and The Friends of Robinson Gardens group, we have not heard a single plan to curtail traffic, trash, noise or other disruptions to our residential neighborhood.**

71-2

Betty's letter actually asserts the ultimate plan of the Robinson Gardens is to be "Less dependent on taxpayer dollars" by hosting more parties at the garden! **She goes on to say, "This is standard operation for County Gardens and City facilities such as LACMA, The Wallis, Descanso Gardens"!!** This is disturbing to equate a 6 acre, former private home, at the end of a residential cul-de-sac, with these high traffic commercial operations. By way of example, Descanso Gardens is on 150 acres and LACMA and The Wallis are clearly in very busy commercial districts.

71-3

The City of Beverly Hills General Plan specifically states that the areas north of Santa Monica Blvd., with the exception of The Beverly Hills Hotel, shall be residential only and specifically non-commercial. **Friends of Robinson Gardens clearly intends to use this public garden for commercial purposes.**

We Respectfully urge and implore you to not increase the allotted number of functions at the Robinson Gardens.

71-4

Sincerely,

Jodi and Don Stine
1024 Cove Way
Beverly Hills, CA

Note: Email from the president of the VRG sent August 22, 2022

Dear Members -

This is **URGENT**. The City Council of Beverly Hills has scheduled a hearing on the proposed SEIR for Tuesday night.

We need to show our support for the changes to the City Council as soon as possible!

We did not receive notification of the meeting in advance, so were unable to prepare.

If you have already sent a letter to the County, you may use the same letter **readdressed** to the City Council of Beverly Hills and send as soon as possible to:

Email: cityclerk@beverlyhills.org

If you can read a short version of your letter at the meeting (3 minutes or less), please attend by Zoom at this address. The meeting starts at 7.

- Video (during public comment only): <http://beverlyhills.org/comment>

Thank you again for helping. Those who oppose the Gardens and would like to curtail operations are well organized and very active. We need to show the City and County how strong the support for Virginia Robinson Gardens really is and how important the changes will be to the work done there.

If you haven't already written, please take a moment now.

Would you please help by writing a short letter (or email) stating your support and mentioning a few of the points listed below?

Your letter to the County should be sent either by snail mail to:

Ms. Jui Ing Chien, Park Planner
County of LA Department of Parks & Recreation
[1000 S. Fremont Ave., Unit #40 A-9](#) West, 3rd Floor
Alhambra, CA 91083

or by email to: jchien@parks.lacounty.gov

Any questions can be directed to the County at (626) 588-5317

Thank you for your ongoing support of the Virginia Robinson Gardens!

Betty Goldstein
President
Friends of Robinson Gardens
[1008 Elden Way](#)

71-5

[Beverly Hills, CA 90210](#)
[310.550.2068](#)
www.robinsongardens.org
On Facebook @ [Robinson Gardens](#)

The letter below is not the actual letter to send, it is a list of reasons you support the project. Please choose a couple and use them in your support letter.

Dear Honorable Board of Supervisors: (or a variation)
OR

Dear Beverly Hills City Council: (Email: cityclerk@beverlyhills.org)

I am writing in support of the modification of the hours, days and number of special use events at Virginia Robinson Gardens. The change in operations at the Virginia Robinson Gardens will create new public benefits and further the Mission of the Gardens:

1. Allowing the Gardens to be open from 9:30am to Sunset seven days a week gives the public it serves greater access
2. Will give the renowned science education program & tours for local and Title One school children more flexibility to attend and allow the program to reach more children
3. Allow more adult education classes promoting environmental sustainability and lectures to be offered to the public
4. More days and hours open benefit the public by making it accessible to families on weekends and after work
5. Making the Gardens available for private rental on a limited basis helps the Gardens to be less dependent on taxpayer dollars. This is a standard operation for County and City facilities such as LACMA, The Wallis, Descanso Gardens and other parks and gardens, etc.
6. Give the public more access to an amazing national registry landmark/museum that celebrates an important aspect of the history of Beverly Hills

Sincerely,
Signature

Please include your street name so the Supervisors will know you live in the county if sending your letter to the county.

--
Sent from Gmail Mobile

71-5
cont.

Responses to Letter 71 – Jodi and Don Stine

Response to Comment 71-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues. This comment provides introductory material from the commenter, including the fact that they are a member of the Friends of Robinson Gardens. The commenter expresses general opposition to the proposed operational changes. However, the commenter does not raise a specific environmental issue; therefore, no further response is required or provided.

Response to Comment 71-2:

This comment describes an email received from the President of the Friends of Virginia Robinson Gardens. However, the commenter does not raise a specific environmental issue or comment on the adequacy of the Draft SEIR; therefore, no further response is required or provided.

The commenter claims the County has no plans to curtail traffic associated with the proposed operational changes. The Draft SEIR outlines that Special Use Events would comply with City ordinances, and valet service must obtain City parking permits for use of public streets to avoid overlapping events with surrounding neighbors. Please refer to Master Response 1, Master Response 2, and Master Response 3.

The commenter also claims the County has no plans to curtail noise associated with the proposed operational changes. Please refer to Master Response 5. This comment is noted.

Response to Comment 71-3:

The commenter asserts that the County intends to turn the Gardens into a commercial venue. Please refer to Master Response 8 and Master Response 9. This comment is noted.

Response to Comment 71-4:

This comment expresses opposition to the proposed operational changes. As this comment is not direct comments on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Response to Comment 71-5:

This comment includes a copy of an email sent on August 22, 2022. As this comment is not direct comments on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 72 - Lynn Whitaker - August 23, 2022

August 23, 2022

Dear Board of Supervisors,

I am writing to in support of modifying the hours and days Virginia Robinson Gardens is open. The current hours/days of operation do not allow for so many working people and families to use this precious facility and grounds.

To expand to later weekly hours and more weekend days, there can be additional tours and classes for the public to enjoy this serene open space. It will also allow the Gardens to expand the acclaimed children's science education program to more children, especially those in Title One schools. Now, so few people know about the Gardens due to the limited accessibility!

Virginia Robinson graciously donated her property to Los Angeles County so many people could enjoy what she was fortunate to have – a respite from the city – and the County should honor her wishes by making the Gardens more available to those who would most benefit from visiting. The current hours of operations shut out many of these individuals.

Everyone should be able to enjoy this amazing historical property and expanding the days and hours of operation is key to including those who work.

Thank you for addressing this much-needed issue.

Sincerely,



Lynn Whitaker
13336 Maxella Ave. #5
Marina Del Rey, CA 90292

72-1

Responses to Letter 72 – Lynne Whitaker

Response to Comment 72-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 73 - Laurie Hartigan - August 23, 2022

From: [lkhartigan](#)
To: [Jui Ing Chien](#)
Subject: The Robinson Gardens
Date: Tuesday, August 23, 2022 2:53:16 PM

CAUTION: External Email. Proceed Responsibly.

Dear Honorable Board of Supervisors:

I have been involved with preserving the Robinson Gardens since 1991. As a fifth generation Angeleno, it saddens me that so few of the old landmarks — whether buildings or parks and gardens — that embodied our Southern California way of life remain to be seen and enjoyed. Having grown up in Whittier, I have lived on North Bundy Drive since 1984 and watched as the places we can gather and enjoy as a community become scarcer and more difficult to enjoy.

I am writing in support of the modification of the hours, days and number of special use events at Virginia Robinson Gardens. The change in operations at the Virginia Robinson Gardens will create new public benefits and further the Mission of the Gardens.

By allowing the Gardens to remain open from 9:30 am to Sunset seven days a week gives the public it serves greater access. Plus, making the Gardens available for private rental on a limited basis helps the Gardens to be less dependent on taxpayer dollars. This is a standard operation for County and City facilities such as LACMA, The Wallis, Descanso Gardens and other parks and gardens.

Thank you for your attention to and consideration of this matter.

Sincerely,

Laurie K. Hartigan

73-1

Responses to Letter 73 – Laurie Hartigan

Response to Comment 73-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 74 - Elva Yanez, Prevention Institute - August 24, 2022



August 24, 2022

Ms. Jui Ing Chien, Park Planner
County of Los Angeles
Department of Parks and Recreation
1000 S. Fremont Avenue
Unit #40 A-9 West, 3rd Floor
Alhambra, CA 91083

Re: Proposed Operational Changes at Virginia Robinson Gardens Supplemental Environmental Impact Report

Dear Honorable Supervisors,

On behalf of Prevention Institute, I am writing to express our support for the proposed operational changes at Virginia Robinson Gardens (VRG). As an organization seeking to advance park equity and environmental justice, we know these changes will help to improve public access to VRG, enabling more Los Angeles County residents, especially families and children, to enjoy this hidden gem and experience the many benefits it offers.

Prevention Institute is a national nonprofit with offices in Oakland and Los Angeles. Our mission is to ensure that the places where people live, work, play and learn foster health, safety, and wellbeing. We do this by building prevention, health equity and racial justice into key policies and actions at the federal, state, local, and organizational levels. A prominent body of our Los Angeles work focuses on advancing park equity by fostering greater access to quality parks and green space for Black, Indigenous, and people of color (BIPOC). We seek to undo generations of racial segregation and community disinvestment that have barred BIPOC communities from enjoying the health, social and environmental benefits of park and green spaces. The VRG can serve as a leader in ensuring all people in LA County can benefit from green spaces and being outside.

74-1

As a public garden, VRG provides a wide range of benefits to visitors, including improving mental and physical health; reducing stress; improving air quality; preserving biodiversity, wildlife habitats, and urban forest; mitigating urban heat island effects and stabilize temperature; providing a community gathering space; and improving academic performance for students who visit the gardens.

Expanding access to VRG is the right thing to do. As we have learned during the pandemic, public spaces like parks and gardens are so important for our health and well-being. We fully support the Department of Parks and Recreation's efforts to increase access to parks, gardens, and other green spaces to all L.A. County residents, particularly those living in underserved communities which lack such vital civic infrastructure.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Elva Yanez".

Elva Yañez
Senior Advisor on Parks, Land Use, and the Built Environment

Cc: Los Angeles County Supervisor Sheila Kuehl, 3rd District

Responses to Letter 74 – Elva Yanez, Prevention Institute

Response to Comment 74-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 75 - Kathleen Spiegelman - August 25, 2022

From: K.Spiegelman Interiors <kathleenspiegelman@yahoo.com>
Sent: Thursday, August 25, 2022 10:54 AM
To: Jui Ing Chien
Subject: Support for the proposed changes at Robinson Gardens

CAUTION: External Email. Proceed Responsibly.

August 25, 2022

Dear Ms. Jui Ing Chien &

Honorable Board of Supervisors

I am writing in support of the proposed changes for the Virginia Robinson Gardens. Listed below are some of the reasons I believe the changes will benefit the community.

1. Allowing the Gardens to be opened the proposed extended hours (9:30am to sunset) and seven days a week gives the public and community it serves greater access.
2. The additional days and hours will allow working families access after work and on the weekends
3. Making the Gardens available for private rental (on a limited basis) helps the Gardens to be less dependent on taxpayer dollars. This is standard practice for County and City facilities such as LACMA, Descanso Gardens, The Wallis and other parks and gardens.
4. Last but not least it would give the public access to an amazing landmark that celebrates an important aspect of the history of Beverly Hills.

Sincerely,

Kathleen Spiegelman

2252 W. Washington Blvd.

Los Angeles, CA 90018

C:310.344.8655

T:323.840.3533

F:323.840.3553

kathleenspiegelman@yahoo.com

Responses to Letter 75 – Kathleen Speigelman

Response to Comment 75-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 76 - Charles Alpert - August 25, 2022

From: Chuck Alpert <calpert@hotmail.com>
Sent: Thursday, August 25, 2022 12:35 PM
To: Jui Ing Chien
Cc: COCO_Contact_Us; Chong-Castillo, Maria
Subject: FAILURE TO COMPLY LAWFULLY WITH CEQA NOTICE PROVISIONS -- DSEIR - Virginia Robinson Gardens

CAUTION: External Email. Proceed Responsibly.

ALL ISSUES RAISED IN THIS CORRESPONDENCE ARE INTENDED TO BE PART OF THE CEQA RECORD AND PRESERVED AS POTENTIAL CONTESTED MATTERS IN THE EVENT OF LITIGATION.

MS. CHIEN:

This email represents a formal objection to the legality of the Notice of Completion and Availability of the Draft Supplemental Environmental Impact Report for the Proposed Changes at the Virginia Robinson Gardens (State Clearinghouse # 2012091034). (The "Notice")

76-1

The Notice issued on or around July 22, 2022 reads as follows: "The formal public review period for the Draft SEIR will be from **July 22, 2022 to September 5, 2022** (45 days). All comments received by the closing of the public review period will be consider in the Final SEIR."

Later in the Notice, the document reads: "Please submit written comments on the Draft SEIR by **September 5, 2022** to Ms. Jui Ing Chien, Park Planner." At a virtual public meeting held on this matter on Wednesday August 10, 2022, a representative of the County Department of Parks and Recreation likewise indicated that comments must be sent to Ms. Chien by September 5, 2022.

76-2

It is an indisputable truth that September 5, 2022 is a National and State Holiday, Labor Day.

California Courts have ruled that the CEQA comment period may not end on a legal holiday. In *Rominger v. County of Colusa*, the Third District Court of Appeal, (2014) 226 App 4th 690, held that a county had failed to give the full required notice for a mitigated negative declaration prepared for a proposed subdivision. Because the end of the notice period in *Rominger* fell on Labor Day, the court found that the public had effectively received less notice than required.

The *Rominger* court also reasoned: "The county cannot now claim that it actually provided a legally sufficient 30-day public review period because its notices were published prior to August 7 and because it would have continued to accept comments from the public up through the hearing on September 12. The period that must comply with CEQA is the period specified in the notice given to the public. Here, as we have said, that period did *not* comply with CEQA." (Emphasis added.)

76-3

Again, this correspondence represents formal legal notice that the CEQA Notice of Completion and Availability for the above reference project provides a legally insufficient comment period. The proper corrective action will be to reissue the Notice with a new 45-day comment period. Any action short of that step will create potential legal peril to your review process. Interested parties are entitled to a fair, complete and full notice of the CEQA comment period.

I note this is not the first CEQA process issue I have raised on this project. The scoping hearing contained various prejudicial errors and the referenced public hearing failed to indicate a limitation of time for anyone interested in speaking.

76-4

I trust you will forthwith act to issue a new notice with a full, lawful 45-day public review period. The interested public requires no less consideration.

76-5

Respectfully,

Charles Alpert

calpert@hotmail.com

Responses to Letter 76 – Charles Alpert

Response to Comment 76-1:

Thank you for your comment. This comment is regarding a formal objection to the legality of the Notice of Completion and Availability of the Draft Supplemental Environmental Impact Report for the Proposed Project. This comment does not raise any issues regarding the content or adequacy of the environmental analysis in the Draft SEIR for the Proposed Project and does not raise a specific environmental issue. This comment is noted. No further response is required.

Response to Comment 76-2:

This comment quotes the review period stated in the Notice of Completion and Availability of the Draft Supplemental Environmental Impact Report for the Proposed Project. This comment also states the end of the public review period that was stated in a virtual public meeting. This comment states that September 5, 2022, is the Labor Day Holiday. The deadline for public comments was extended to September 6, 2022, to provide additional time. This comment does not raise any issues regarding the content or adequacy of the environmental analysis in the Draft SEIR for the Proposed Project and does not raise a specific environmental issue. This comment is noted. No further response is required.

Response to Comment 76-3:

This comment is regarding the date on which the public review period initially ended for the Proposed Project. This comment states that California Courts have ruled that the CEQA comment period may not end on a legal holiday. This comment is noted. To remedy the fact that the public review period was scheduled to end on September 5, 2022 (which was the Labor Day Holiday), the Notice of Completion and Availability of the Draft Supplemental Environmental Impact Report for the Proposed Project was revised and re-issued on August 29, 2022. The revised notice extended the public review period to end on September 6. Additionally, it should be noted that as matter of standard practice the County of Los Angeles Department of Parks and Recreation distributed the revised notice via these five methods: 1) posted in the Beverly Hills Courier; 2) a hard copy was physically mailed to 80 surrounding property owners within 500 feet of the Project Site; 3) posted on the DPR's website; 4) posted on the Los Angeles County Clerk's website; and 5) posted at the Project Site. CEQA Guidelines Section 15087 requires using at least one of these noticing procedures. Therefore, the commenter's statement that there was a "legally insufficient comment period" is in fact incorrect due to the Project's compliance with CEQA via the issuance of the revised public notice and the documents being available during the full comment period. No further response is required.

Response to Comment 76-4:

This comment states that this is not the first CEQA process issue that the commenter has raised about the Proposed Project. This comment does not raise any issues regarding the content or adequacy of the environmental analysis in the Draft SEIR for the Proposed Project and does not raise a specific environmental issue. This comment is noted.

Additionally, this comment states that the public hearing failed to indicate a limitation of time for anyone interested in speaking. It is believed that the “public hearing” the commenter is referring to is in fact the virtual public meeting held on August 10, 2022. It is of note that CEQA does not require a public meeting for an EIR (CEQA Guidelines Section 15087(i)); nevertheless, a public meeting was held for the Proposed Project to obtain public comment regarding the Draft SEIR.

The comment that the hearing “failed to indicate a limitation of time”, does not raise a CEQA issue and raises no issues regarding the adequacy of the analysis in the environmental documentation prepared for the Proposed Project. As the Lead Agency, the County of Los Angeles can exercise its own judgement regarding the length of time allotted for public comments. It should be noted that under CEQA the County of Los Angeles is not required to hold a public meeting for the Draft SEIR (CEQA Guidelines Section 15087(i)). However, the County chose to do so to facilitate public comments regarding the Draft SEIR. Therefore, the statement by the commenter that the limitation of time to three minutes per commenter was not disclosed in advance of the meeting is moot because each and every person who wished to speak at the public scoping meeting had the same three-minute time frame in which to do so, which is typical for public meetings, such as Beverly Hills City Council meetings. Additionally, during the public meeting, commenters were encouraged to provide written comments. No further response is required.

Response to Comment 76-5:

This comment states the commenter’s belief that a new 45-day noticing period will need be issued for the Proposed Project. This comment does not raise any issues regarding the content or adequacy of the environmental analysis in the Draft SEIR for the Proposed Project and does not raise a specific environmental issue. Please refer to Response to Comment 76-4 above regarding the public review period for the Proposed Project. This comment is noted. No further response is required.

Letter 77 - Charles Alpert - August 29, 2022

From: Chuck Alpert <calpert@hotmail.com>
Sent: Monday, August 29, 2022 12:50 PM
To: Jui Ing Chien
Cc: COCO_Contact_Us; Chong-Castillo, Maria; Chloe Chen
Subject: Re: FAILURE TO COMPLY LAWFULLY WITH CEQA NOTICE PROVISIONS -- DSEIR - Virginia Robinson Gardens

CAUTION: External Email. Proceed Responsibly.

ALL ISSUES RAISED IN THIS CORRESPONDENCE ARE INTENDED TO BE PART OF THE CEQA RECORD AND PRESERVED AS POTENTIAL CONTESTED MATTERS IN THE EVENT OF LITIGATION.

MS. CHIEN:

This email represents a formal objection to the legality of the **Revised** Notice of Completion and Availability of the Draft Supplemental Environmental Impact Report for the Proposed Changes at the Virginia Robinson Gardens (State Clearinghouse # 2012091034). (The "Revised Notice") This Revised Notice once again fails to comport with the legal rulings of California Court decisions as previously advised.

77-1

As explained in my prior email, California Courts have ruled that the CEQA comment period may not end on a legal holiday. In *Rominger v. County of Colusa*, the Third District Court of Appeal, (2014) 226 App 4th 690, held that a county had failed to give the full required notice for a mitigated negative declaration prepared for a proposed subdivision because the end of the notice period in *Rominger* fell on Labor Day, the court found that the public had effectively received less notice than required.

77-2

Unfortunately, you have failed to comprehend and abide by the entire *Rominger* decision. The Court reasoning on this topic is easily comprehended. The County has only exacerbated its legal position by this Revised Notice.

77-3

In that case the Romingers, Plaintiffs-Appellants, argued that the Labor Day deadline "effectively truncated ... three additional days" because of the three-day Labor Day weekend, during which the county offices were closed. The Court agreed by stating the following:

That does not mean, however, that the county complied with CEQA, because it remains true that the last three days of the 30-day public review period of which the county gave notice fell on the Labor Day weekend. **Because the county offices were closed on those three days, the Romingers are correct that the county effectively truncated the public review period by three days. No one could have gone to the county offices on September 3, 4, or 5 to review the pertinent documents or to submit comments on the proposed mitigated declaration. Thus, under the circumstances here, the county effectively provided only a 27-day public review period, which did not comply with CEQA.** (Emphasis added.)

77-4

Thus, your Revised Notice is also unlawful by being contrary to California judicial rulings.

Since CEQA represents a process designed to encourage public comment but you have now twice provided improper notice days coupled with other irregularities in the hearing process. To underscore, this correspondence represents formal legal notice that the Revised CEQA Notice of Completion and Availability for the above reference project also provides a legally insufficient comment period.

77-5

The proper corrective action will be to reissue the Notice with a new 45-day comment period. Any action short of that step will create potential legal peril to your review process. Interested parties are entitled to a fair, complete and full CEQA comment period and adequate notice thereof.

I trust you will forthwith act to issue a new notice with a full, lawful reinitiated 45-day public review period. The interested public requires no less consideration.

77-6

Respectfully,

Charles Alpert
calpert@hotmail.com

Responses to Letter 77 – Charles Alpert

Response to Comment 77-1:

This comment is regarding a formal objection to the legality of the Revised Notice of Completion and Availability of the Draft Supplemental Environmental Impact Report for the Proposed Project. This comment does not raise any issues regarding the content or adequacy of the environmental analysis in the Draft SEIR for the Proposed Project and does not raise a specific environmental issue. This comment is noted. No further response is required.

Response to Comment 77-2:

This comment states that California Courts have ruled that the CEQA comment period may not end on a legal holiday. This comment goes on to cite the following court case: *Rominger v. County of Calusa*. Because the public comment period was originally scheduled to end on a holiday, the public comment period was extended. This comment does not raise any issues regarding the content or adequacy of the environmental analysis in the Draft SEIR for the Proposed Project and does not raise a specific environmental issue. This comment is noted. No further response is required.

Response to Comment 77-3:

This comment states that the entire Rominger decision was not abided by. Please refer to Response to Comment 77-2 above.

Response to Comment 77-4:

This comment cites findings from the *Rominger v. County of Calusa* court case. It should be noted that all of the other weekends (Saturdays and Sundays) during the revised public review period counted towards the total number of days in the review period, therefore the Saturday and Sunday before the Labor Day Holiday would not be any different regarding those two days counting toward the total days in the public review period. Although the County of Los Angeles was in fact closed on Monday September 5 (the Labor Day Holiday), the revised public notice *extended* the official review period through Tuesday, September 6, thereby making up for the Labor Day Holiday. Additionally, it should be noted that all comments received (including any received after the end of the September 6, 2022 comment period) will be added to the public record for the Proposed Project. With the revised public notice the revised public review period was for a total of 46 days, in compliance with CEQA Section 21091, *Draft Environmental Impact Reports and Negative Declarations; Review Periods*, to have a minimum 45-day public review period for Draft EIRs.

No further response is required.

Response to Comment 77-5:

This comment is regarding the days in the public review period for the Proposed Project. This comment is noted. This comment does not raise any issues regarding the content or adequacy of the environmental analysis in the Draft SEIR for the Proposed Project and does not raise a specific environmental issue. Please refer to Response to Comment 76-3 and Response to Comment 77-4.

Response to Comment 77-6:

This comment is regarding re-issuance of the 45-day public review period. This comment does not raise any issues regarding the content or adequacy of the environmental analysis in the Draft SEIR for the Proposed Project and does not raise a specific environmental issue. Refer to Response to Comment 76-4 and Response to Comment 77-4 regarding the 46-day review period for the Proposed Project, which exceeds the 45-day review period requirement under CEQA. This comment is noted. No further response is required.

Letter 78 - Vera and Paul Guerin - August 30, 2022

From: vera@pvguerin.com
Sent: Tuesday, August 30, 2022 9:14 AM
To: Jui Ing Chien
Subject: Draft Seir Comments

Dear Ms. Chien,

I would like to go on record that my husband and I, Paul and Vera Guerin, are strongly opposed to the new regulations being suggested by LA County Parks and Recreation. At the moment, we live in a relatively safe and quiet neighborhood which would be hugely disrupted by the new measures being proposed. The traffic, exposure, noise and lack of parking from the proposed County plan would not only be disruptive to the neighborhood, but in conflict with prior agreements made by Robinson's Gardens and its neighbors.

We are all in favor of continuing using this facility as a teaching tool, but the existing hours should suffice in accomplishing this goal. Making this facility available to large catering events every weekend is in direct conflict with existing agreements with the Gardens. We feel that the existing conditions that we all agreed to are fair and collaborative. Mandating new conditions as those proposed are not only legally questionable but onerous to all the surrounding neighbors and neighborhood, and to our businesses and restaurants, i.e. the Beverly Hills Hotel, which operate in the vicinity. There is absolutely no need for another competing event space which doesn't even have its own kitchen!!!

Thank you for taking the time to accept and digest this letter of protest. We are all in hope that you will do the right thing for our supportive neighborhood. You are our representatives and we depend on you.

Thank you,
Vera and Paul Guerin
1014 North Crescent Drive

78-1

Responses to Letter 78 – Vera and Paul Guerin

Response to Comment 78-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues. This comment provides introductory material from the commenter, including the fact that they are a neighbor of the Project Site. The commenter expresses opposition to the proposed operational changes, stating that the Project would result in noise, traffic, and parking issues. The commenter also claims that the proposed operational changes would conflict with the existing operating Agreement between the County and Friends of Virginia Robinson Gardens.

Noise impacts from the Proposed Project are discussed in Section 3.14, *Noise*, beginning on page 3-29 of the Draft SEIR. The County has also prepared a site-specific noise impact study, which is included as Appendix E of the Draft SEIR. Please refer to Master Response 4 and Master Response 5. This comment is noted.

Parking is discussed in Section 2.2.3, *Special Use Events*, on page 2-4 of the Draft SEIR and Section 2.4.5, *Parking*, beginning on page 3-29 of the Draft SEIR. Parking and traffic impacts associated with the Proposed Project are discussed in Section 4.18, *Transportation*, beginning on page 3-61 of the Draft SEIR. The County has also prepared a site-specific traffic impact assessment for the Proposed Project which is included as Appendix F of the Draft SEIR. Please refer to Master Response 1, Master Response 2, and Master Response 3.

As such, the analysis requested by the commenter has been provided in the Draft SEIR. The remaining portions of the comment are not direct comments on the content or adequacy of the Draft SEIR and do not raise a specific environmental issue, and no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Proposed Operational Changes at the
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Letter 79 - Alice Gardello - August 30, 2022

10966 Pickford Way
Culver City, CA 90230-4442
Aug. 23, 2022

Mrs. Jui Ing Chien, Park Planner
County of L.A. Dept. of Parks & Recreation
1000 S. Fremont Ave., Unit #40 A-9 West, 3rd floor
Alhambra, CA 91803

AUG 30 22 1:15PM

Dear Honorable Board of Supervisors,

I am writing in support of the modification of the
hours, days & number of special use events at the Virginia
Robinson Gardens. The change in operations at the V.R.G. will
create new public benefits & further the mission of the Gardens:

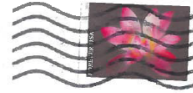
- 1) more days & hours open benefit the public by making
it accessible to families on weekends & after work.
- 2) Give the public more access to an amazing national
registry landmark & museum that celebrates the important
aspect of the history of Beverly Hills.

79-1

Sincerely,
Alice Gardello
Children's Docent, V.R.G.

Alice Gardello
10966 Pickford Way
Culver City, CA 90230

LOS ANGELES CA 900
24 AUG 2022 PM 9 L



Mrs. Jui Ing Chien, Park Planner
County of L.A. Dept. of Parks & Recreation
1000 S. Fremont Ave., Unit #40 A-9 West,
Alhambra, CA 91803
Third Floor

91803-885904



Responses to Letter 79 – Alice Gardello

Response to Comment 79-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 80 - Susan Landay - August 30, 2022

From: suz landay <suzlanday@icloud.com>
Sent: Tuesday, August 30, 2022 6:18 PM
To: Jui Ing Chien
Subject: The Virginia Robinson Gardens

CAUTION: External Email. Proceed Responsibly.

Dear Ms. Chien:

I would like to express to you the importance of these gardens. It is so special to find a place where you can be transported into another time and a lifestyle that is no longer around. The home and the gardens were uniquely created by a very special lady. Her touch is seen throughout the grounds. The story of her life is a lesson in how to make the most of what you have. She had plenty and she used it to create 7 acres of beauty.

I first discovered the gardens at a piano concert performed on Virginia's Chickering piano. I joined the Society and was delighted to find that there were events I could attend every month, lectures, demonstrations on floral arranging, Christmas Wreath workshops, delicious lunches all in the company of delightful guests. I became a docent and in the last 16 years have introduced many guests to Virginia and her world. They have learned about a lifestyle that included not just private maids and gourmet chefs, but a Major Domo!

The guests learn about the history of Beverly Hills, the celebrities who lived there and how it grew into what it is today. Where else is that possible?

The gardens have been held to tours only on 4 weekdays. Never on the weekend. This prevents people who work or go to school, families who would like to enjoy the day there with their families. It also eliminates the opportunity to fundraise for the children's science program which has educated children from inner city schools in botany and history of gardens.

Please consider allowing the gardens to maintain weekday and weekend visits.

Susan Landay

80-1

Responses to Letter 80 – Susan Landay

Response to Comment 80-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 81 - Francisco Romero, Park Equity Alliance - August 31, 2022



August 31, 2022

Ms. Jui Ing Chien, Park Planner
County of Los Angeles
Department of Parks and Recreation
1000 S. Fremont Avenue
Unit #40 A-9 West, 3rd Floor
Alhambra, CA 91083

Proposed Operational Changes at Virginia Robinson Gardens
Supplemental Environmental Impact Report

Dear Ms. Chien:

We are writing to express our support of the proposed operational changes at Virginia Robinson Gardens (VRG). As a regional grouping of local, state and national organizations, the Park Equity Alliance is seeking to advance park equity and environmental justice, and we know these changes will help to improve public access to VRG. This will enable more Los Angeles County residents, especially families and children, to enjoy this hidden gem and experience the many benefits it offers.

As a public garden, VRG provides a wide range of benefits to visitors, including: improving mental and physical health; reducing stress; improving air quality; preserving biodiversity, wildlife habitats, and urban forest; mitigating urban heat island effects and stabilize temperature; providing a community gathering space; and improving academic performance for students who visit the gardens, among others.

Expanding access to VRG is the right thing to do. As we have learned during the pandemic, public spaces like parks and gardens are so important for our health and well-being. We fully support the Department of Parks and Recreation's efforts to increase access to parks, gardens, and other green spaces to all L.A. County residents, particularly those living in underserved communities which lack such vital civic infrastructure.

Thank you for your time and consideration.

Sincerely, Park Equity Alliance,

Signatory Members of the Park Equity Alliance include:

Asian Pacific Islander Forward Movement, National Health Foundation, Pacoima Beautiful, Promesa Boyle Heights, Social Justice Learning Institute, The Wilderness Society, Trust for Public Land, and Willowbrook Inclusion Network

81-1

Responses to Letter 81 – Francisco Romero, Park Equity Alliance

Response to Comment 81-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 82 - Charles Alpert - August 31, 2022

From: Chuck Alpert <calpert@hotmail.com>
Sent: Wednesday, August 31, 2022 3:40 PM
To: Jui Ing Chien
Cc: Kathy Checchi; Chong-Castillo, Maria; lwiener@beverlyhills.org; Chloe Chen
Subject: FAILURE OF NOTICES TO CORRECTLY STATE EXISTING PROJECT CONDITIONS --VIRGINIA ROBINSON GARDENS

CAUTION: External Email. Proceed Responsibly.

ALL ISSUES RAISED IN THIS CORRESPONDENCE ARE INTENDED TO BE PART OF THE CEQA RECORD AND PRESERVED AS POTENTIAL CONTESTED MATTERS IN THE EVENT OF LITIGATION.

MS. CHIEN:

This email represents an additional formal objection to the legality of the **Revised** Notice of Completion and Availability of the Draft Supplemental Environmental Impact Report for the Proposed Changes at the Virginia Robinson Gardens (State Clearinghouse # 2012091034). (The "Revised Notice") and all of the prior Notices in this matter (collectively "the Notices.").

The Revised Notice presents an incorrect description of the existing project as well as a confusing description of the proposed project to the detriment of any member of the public who wishes to participate in the CEQA comment process for this project.

Indeed, the various notices for the DSEIR, including the Revised Notice, have failed to provide the public with an accurate, stable and finite project description so that the public could comment in a coherent, thoughtful manner. See, County of Inyo v City of Los Angeles, (1977) 71 Cal App 3rd 185; *Washoe Meadows Community v Dept Parks and Recreation*, (2017) 17 Cal App. 5th 277.

Note also an even more recent decision, *Stopthemillenniumhollywood.com et al. v. City of Los Angeles et al.* (2019) 39 Cal.App.5th 1, where the Court of Appeal affirmed the trial court's conclusion that an EIR for a mixed-use development project proposed by Millennium Hollywood, LLC (Millennium) in the City of Los Angeles (City) violated CEQA as a matter of law, because it also failed to provide an accurate, stable, and finite project description.

The *Washoe Meadows court*, *supra*, explained that "[t]he problem with an agency's failure to propose a stable project is not confined to '[its] informative quality . . .,' rather, it 'impairs the public's right and ability to participate in the environmental review process.'" (Emphasis added.)

The following tables highlight the manner in which the recent Revised Notice and prior notices include inaccurate information about the true and accurate existing terms for "types of events" and open-ended descriptions of the proposed "types of events."

<u>Types of Events</u>	<u>Types of Events</u>	<u>Types of Events</u>	<u>Types of Events</u>
Final 2014 SEIR	Notice of Virtual Meeting 11/15/21	Notice and Revised Notice of Completion and Availability of DSEIR – 7/22/2022	Notice and Revised Notice of Completion and Availability of DSEIR 7/22/2022
CORRECT EXISTING TERMS	Proposed	Inaccurate Description of	Proposed

**Proposed Operational Changes at the
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Final Supplemental Environmental Impact Report**

		"Existing Events"	
Public Programs to conform to new day/hours and number of participants allowed; however, subject matter for seminar/classes to be determined at the discretion of the Superintendent based on how well the classes interpret the historical collections at the facility. Also, include tours for biology, botany and horticulture groups.	In addition to existing events, consider family ceremonies such as weddings.	<ul style="list-style-type: none"> • Offer children's programs • Schedule staff and public programming such as temporary exhibits, health and physical fitness activities, painting, wine, and cooking classes, etc. • Institute subsidized musical performing arts programs and movie screenings • Subject matter for events to be determined at the discretion of the Superintendent. 	In addition to the existing types of events listed to the left {column} propose adding private and family ceremonies such as weddings.

82-1
cont.

Special Uses is equally inaccurate and unclear.

<u>Special Uses</u>	<u>Types of Events</u>	<u>Types of Events</u>	<u>Types of Events</u>
Final 2014 SEIR CORRECT "EXISTING TERMS"	Notice of Virtual Meeting 11/15/21 Proposed	Notice and Revised Notice of Completion and Availability of DSEIR – 7/22/2022 Description of "Existing Special Uses"	Notice and Revised Notice of Completion and Availability of DSEIR 7/22/2022 <u>Proposed</u>
Special Uses limited to four (4) per year with expanded theme to include, but not limited to: <ul style="list-style-type: none"> • Extend Garden Tour to two consecutive days to allow greater overall attendance • Offer public tour in the evening with a meal served with or without tables • Offer public tour for donors during daylight hours featuring seasonal aspects of the garden or recent restoration projects. • Offer performing arts in the garden, such as classical 	Up to 24 special use events a year/approximately 2 per month (special events are currently limited to 4 per year.)	<ul style="list-style-type: none"> • 4 special use events per year. Tickets are sold to regulate the number of visitors to ensure safety and a quality experience. 	<ul style="list-style-type: none"> • Up to 24 special use events per year. Tickets would continue to be sold to regulate the number of visitors to ensure safety and a quality experience.

Proposed Operational Changes at the
Virginia Robinson Gardens
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<p>music, theatre or poetry readings</p> <p>For special uses, theme would be determined at the discretion of the Superintendent. Programs must continue to focus on the historical interpretation of the facility, such as the non-living and living collections housed at the facility, the gardens, etc.</p> <p>For special uses, there are no restrictions on the number of guests or hours /day of operations; however, tickets are sold to regulate the number of visitors to assure safety, and a quality experience.</p> <p>Additionally, the event voluntarily complies with city ordinances, which require no amplified music after 10 PM and valet service must obtain city parking permits for use of public streets to avoid overlapping event with surrounding neighbors.</p>			
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82-1
cont.

On its face and foremost , the Notices for the proposed changes covered by the DSEIR inaccurately describe the existing operating conditions per the 2014 SEIR, i.e the existing conditions. How can one properly comment on proposed changes when the existing operational terms are not accurately set forth? An interested party cannot comment in any meaningful way under these circumstances.

A host of other confusing elements also exist. Consider some of the other chaos created by the Notices:

- Is a wedding or other private party, a special use or only if the wedding issues tickets?
- Is a wedding or other private party just an event allowed without restrictions?
- Can the Gardens host more than 24 weddings a year if it is just an "event?"
- Does the limitation on the number of special uses only apply if tickets for the special use event are issued?
- Under the types of events, the Notices provide a list of events as existing events that the actual existing terms clearly prohibit, e.g. wine classes, health and fitness classes, cooking classes, as they do not on their face or logically interpret "the historical collections on the property" as required by the existing terms or definition of an allowed event.
- The discretion of the Superintendent is open ended and arbitrary and not tethered to any criteria unlike the actual existing terms.

As one tries to comment meaningfully on the DSEIR, the more impossible the task becomes due to the lack of an accurate description of prior terms and absolutely no clarity of what constitutes an event versus a special use or how the discretion of the Superintendent will be exercised.

Only one proper corrective action exists: reissue/recirculate the Notice and the DSEIR with a new 45-day comment period. Any action short of this recommended step will create potential legal peril to your entire environmental review process. Interested parties are entitled to an accurate, stable, finite project description.

This comment must be read with my prior comments related to the County's failure to provide a full 45-day comment period, and a fair, complete and full CEQA comment period and adequate notice thereof.

I trust you will forthwith act to issue a new notice with a full, lawful reinitiated 45-day public review period with an accurate, stable, and finite project description. The interested public requires no less consideration. The legal support for this position remains compelling.

Respectfully,

Charles Alpert
calpert@hotmail.com

82-1
cont.

Responses to Letter 82 – Charles Alpert

Response to Comment 82-1:

This comment is regarding the legality of the Revised Notice of Completion and Availability of the Draft Supplemental Environmental Impact Report (NOC) for the Proposed Project. This comment states that the Revised Notice “presents an incorrect description of the existing project as well as a confusing description of the proposed project...” However, the commenter fails to detail the ways in which the project description in the Revised NOC is incorrect. The statement that the description is “confusing” is a matter of opinion.

Per CEQA Section 15372:

“Notice of Completion” means a brief notice filed with the Office of Planning and Research by a Lead Agency as soon as it has completed a draft EIR and is prepared to send out copies for review. The contents of this notice are explained in Section 15085.”

Per CEQA Section 15085(b):

(b) *The notice of completion shall include:*

- (1) *A brief description of the project,*
- (2) *The proposed location of the project (either by street address and cross street, for a project in an urbanized area, or by attaching a specific map, preferably a copy of a U.S.G.S. 15' or 7-1/2' topographical map identified by quadrangle name).*
- (3) *An address where copies of the draft EIR are available, and*
- (4) *The review period during which comments will be received on the draft EIR.*

Both the initial and Revised NOC for the Proposed Project contain items 1 through 4 listed above as to which the NOC shall include. Therefore, these documents comply fully with the NOC requirements set forth in CEQA Section 15085(b). This comment is noted. No further response is required.

The project description provided in the NOC is not meant to be exhaustive. As detailed above, the NOC should include a “brief description of the project.” The NOC provides a brief summary of the project so the reader knows the project location and understands what the project is proposing. If someone wishes to obtain more information and detail regarding the project than what is provided in the NOC, then they may refer to the actual environmental document for a complete and thorough project description. For large documents such as EIRs project descriptions can be multiple pages in length. The NOC was posted in various ways including at the County Clerk, at the physical location, in the newspaper, DPR’s website, and mailed to the surrounding property owners. Interested parties were referred to the actual environmental document for all the information germane to the Proposed Project.

This comment cites court cases (*County of Inyo v. City of Los Angeles*, (1977) 71 Cal App 3rd 185 and *Washoe Meadows Community v. Dept Parks and Recreation* (2017) 17 Cal App. 5th 277) and how those cases violated CEQA as a matter of law by failing to provide an accurate, stable, and finite project description. The legal cases cited in this comment letter are reviewed in more detail below.

County of Inyo v. City of Los Angeles

Regarding the project description, this cases states: "A curtailed or distorted project description may stultify the objectives of the reporting process. Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal's benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal (i.e., the 'no project' alternative) and weigh other alternatives in the balance. An accurate, stable and finite project description is the Sine qua non of an informative and legally sufficient EIR."¹

Washoe Meadows Community v. Dept Parks and Recreation

"Washoe filed a first amended petition for writ of mandate seeking to set aside the approval of the project based on the following alleged CEQA violations: (1) the DEIR did not contain an "accurate, finite and stable" project description²" Additionally, "The draft EIR in this case did not identify a proposed project, but described five very different alternative projects then under consideration. Consequently, the public was not provided with "an accurate, stable and finite" project description on which to comment. (County of Inyo v. City of Los Angeles (1977) 71 Cal.App.3d 185, 192–193 (County of Inyo).)"²

The reference to this court case does not apply to the Proposed Project because the Project Description contained in the Draft EIR for the Proposed Project is accurate, stable, and finite.

Stopthemillenniumhollywood.com, et al. v. City of Los Angeles, et al.

The commenter cites the *Stopthemillenniumhollywood.com, et al. v. City of Los Angeles, et al.* court case as an example, as follows: *"Note also an even more recent decision Stopthemillenniumhollywood.com, et al. v. City of Los Angeles, et al. (2019) 39 Cal.App.5th 1, where the Court of Appeal affirmed the trial court's conclusion that an EIR for a mixed-used development project.....violated CEQA as a matter of law, because it also failed to provide an accurate, stable, and finite project description."*

The courts' finding regarding a stable and finite project description pertains to the project description in the DEIR not the NOP. When reviewing this court case, the court found the following:

"... the project description is not simply inconsistent, it fails to describe the siting, size, mass, or appearance of any building proposed to be built at the project site. The draft EIR does not describe a building development project at all. Rather, it presents different conceptual development scenarios that Millennium or future developers may follow for development of this site. These concepts and development scenarios – none of which may ultimately be constructed – do not meet the requirement of a stable or finite proposed project³."

The reference to this court case does not apply to the Proposed Project in that the Project Description contained in the Draft SEIR for the Proposed Project is accurate, stable, and finite. In

¹Source: COUNTY OF INYO v. CITY OF LOS ANGELES | FindLaw

²Source: <https://caselaw.findlaw.com/ca-court-of-appeal/1879796.html>

³Source: Court of Appeal Stops Millennium Hollywood from Moving Forward Based Upon Indefinite Project Description | Allen Matkins - JDSupra

the *Stopthemillenniumhollywood.com, et al. v. City of Los Angeles, et al.* court case the developer proposed a project in 2008 and the developer decided to make certain changes to the project and, in 2011, submitted a revised project application that was similar to the 2008 application, but lacked a great deal of detail³. In contrast, this has not occurred regarding the Project Description in the Draft SEIR for the Proposed Project. Therefore, these two projects are not comparable.

CEQA Section 15124, Project Description, is quoted below, along with text in bold as to where the applicable information is contained in the Draft SEIR for the Proposed Project:

"The description of the project shall contain the following information but should not supply extensive detail beyond that needed for evaluation and review of the environmental impact.

*(a) The precise location and boundaries of the proposed project shall be shown on a detailed map, preferably topographic. **Refer to Figure 2-2, Virginia Robinson Gardens Property Map, on page 2-3 of the Draft SEIR.** The location of the project shall also appear on a regional map. **Refer to Figure 2-1, Vicinity and Location Map, on page 2-2.***

*(b) A statement of the objectives sought by the proposed project. A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project and may discuss the project benefits. **Refer to Section 2.3, Project Objectives, on pages 2-4 and 2-5 of the Draft SEIR.***

*(c) A general description of the project's technical, economic, and environmental characteristics, considering the principal engineering proposals if any and supporting public service facilities. **Refer to Section 2.4, Project Description, on pages 2-1 through 2-8 of the Draft SEIR.***

*(d) A statement briefly describing the intended uses of the EIR. **Refer to Section 1.2, Decision to Prepare a Supplement to the Final 2014 SEIR, on pages 1-2 and 1-3 of the Draft SEIR.***

(1) This statement shall include, to the extent that the information is known to the Lead Agency,

*(A) A list of the agencies that are expected to use the EIR in their decision making. **Refer to page 3-27 of the Draft SEIR.***

*(B) A list of permits and other approvals required to implement the project. **Refer to page 3-27.***

*(C) A list of related environmental review and consultation requirements required by federal, state, or local laws, regulations, or policies. To the fullest extent possible, the lead agency should integrate CEQA review with these related environmental review and consultation requirements. **Refer to page 3-27.***

*(2) If a public agency must make more than one decision on a project, all its decisions subject to CEQA should be listed, preferably in the order in which they will occur. On request, the Office of Planning and Research will provide assistance in identifying state." **Refer to page 3-27 of the Draft SEIR.***

The project description provided in the initial NOC, the Revised NOC, and the Draft SEIR for the Proposed Project each met the requirements for their respective project descriptions under CEQA. This comment does not raise any issues regarding the content or adequacy of the environmental analysis in the Draft

SEIR for the Proposed Project and does not raise a specific environmental issue. This comment is noted. No further response is required.

This comment states that the “notices for the proposed changes covered by the DSEIR inaccurately describe the existing operating conditions per the 2014 SEIR, i.e., the existing conditions”...and the commenter then posed several questions regarding the notices. Per CEQA Guidelines Section 15125 regarding environmental setting states: “*Generally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced...*” Therefore, in compliance with CEQA, the Draft SEIR and the associated notices for the Proposed Project accurately described the environmental setting.

Refer to Response to Comments 76-5, 77-4, and 77-6 which address comments regarding a new 45-day comment period.

Letter 83 - Janice Chung, September 1, 2022

August 30, 2022

Via Email: jchien@parks.lacounty.gov

Ms. Jui Ing Chien
Park Planner
County of Los Angeles
Department of Parks and Recreation
1000 S. Fremont Ave.
Unit #40 A-9 West, 3rd Floor
Alhambra, California 91083

Re: Comments on Virginia Robinson Garden Expansion Plan

Dear Ms. Chien and to Whom It May Concern:

1. Save the Virginia Robinson Garden from risks of fire and damages by the Private parties and events; and provide a comprehensive plan to prevent such risks;
2. Preserve the Virginia Robinson Garden Estate from mass visitors and show how the docent-led programs will be added and performed to ensure the estate is not ruined and damaged;
3. Disclose the Students' educational programs and its historic data and all other programs and activities in order to ensure the Garden has been used properly;
4. Disclose the outreach efforts made to improve the students' educational programs to benefit more students from L.A. County and especially Title 1 Schools;
5. Show the transparency on the maintenance costs and Friends of Robinson Garden's accounting for donations received and its expenditures;
6. Show how the private parties will be booked and managed fairly without making the Estate an exclusive backyard for some connected people and provide a rationale for what makes this expansion a public benefit;
7. Listen to the neighborhoods to their concerns, and provide mitigation measures which will protect the neighborhood; and
8. Honor the original donor agreement, and provide an explanation of why L.A. County believes they can break the agreement.

83-1

83-2

83-3

Sincerely,

Janice Chung 613 N. Alpine Dr. Beverly Hills, CA. 90210
Name Address

Responses to Letter 83 – Janice Yung

Response to Comment 83-1:

The commenter expresses concern for potential fire incidents caused by Special Use Events at the Gardens. Project impacts related to wildfire are discussed in Section 3.10, *Hazards and Hazardous Materials*, beginning on page 3-21 of the Draft SEIR and Section 3.21, *Wildfire*, beginning on page 3-77 of the Draft SEIR. Please refer to Master Response 6 and Master Response 7.

Further, the commenter is also concerned that visitors could “ruin and damage” the Gardens. As described on page 3-12 of the Draft SEIR, character-defining features within the Virginia Robinson Gardens would continue to be protected from direct and indirect actions of patrons under Special Use Event use guidelines, which has successfully occurred for decades. The proposed operational changes are consistent in type of use, use guidelines and rules, and long-term management that are already in place.

The remaining comments request the Gardens to disclose program data, outreach efforts, and maintenance costs. As these comments are not direct comments on the content or adequacy of the Draft SEIR and do not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Response to Comment 83-2:

This comment requests that the Draft SEIR address the concerns of the neighborhood and include mitigation measures to protect the neighborhood. To reduce noise impacts to a less than significant level, Mitigation Measure NOI-1 is included to reduce noise impacts to a less than significant level. Please refer to page 3-54 of the Draft SEIR and Master Response 5.

The Gardens will continue to implement measures to reduce traffic impacts. No parking is permitted to occur on Elden Way, by either event guests or valet parking staff. Valet parking is used for Special Use Events that are larger. These larger events include an application for a Valet Permit and a Special Event Permit from the City of Beverly Hills. A street parking permit is issued by the City. Off-site parking is also made available for some events, so that guests can be shuttled to the Project Site and the need for on-street parking by valets can be reduced or eliminated, depending on the event plan. However, the Proposed Project would still result in significant and unavoidable traffic impacts on Elden Way. Feasible physical improvements for the local roadway volume impact on Elden Way were not identified, nor were feasible mitigation measures identified that would reduce the number of Project trips to a level where the local impact is not significant.

The remaining 19 resource areas were determined to have less than significant impacts or no impacts, thus no mitigation is required. This comment is noted.

Response to Comment 83-3:

Please refer to Master Response 8 and Master Response 9. This comment is noted.

Letter 84 - Mahboubi Family - September 1, 2022

Subject: Virginia Robinson Gardens

Dear Ms. Chien:

We, the undersigned, are writing to voice our objections to LA County's suggested modifications to the schedule of operations at Robinson Gardens.

These proposed changes will essentially render the Gardens into a commercial venue, and will completely ruin the fabric of our peaceful residential neighborhood.

The hours of operation as they stand now are way too excessive. Adding more hours is totally unreasonable and unacceptable. Whenever there's an event at the Gardens my driveways get blocked. I can't get in and out of my house, not to mention the dangers posed to our health and safety as emergency vehicles cannot reach us in a timely manner.

We would very much appreciate your understanding of our complaints.

84-1

Respectfully:

dar Mahboubi
Mahie Mahboubi
Jonathan Mahboubi
Rebecca Mahboubi

Responses to Letter 84 – Mahboubi Family

Response to Comment 84-1:

Thank you for your comment. The commenter provides anecdotal information and expresses opposition to the increased operational hours. This is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 85 - Maralee Beck - September 1, 2022

From: Maralee Beck <mjb1chief@yahoo.com>
Sent: Thursday, September 1, 2022 5:59 PM
To: Jui Ing Chien
Cc: Friends of Robinson Gardens
Subject: SEIR Virginia Robinson Gardens
Attachments: CA_LA Economic Benefits Report_LowRes.pdf

CAUTION: External Email. Proceed Responsibly.

September 1, 2022

Dear Honorable Supervisors,

I am writing in support of the modification of operations of the Virginia Robinson Gardens. As a longtime member of the Friends of Robinson Gardens & the BOG, I know firsthand that allowing more access and expanding the ability to fundraise will have important benefits for the public, both in Beverly Hills and the greater Los Angeles community.

I had the privilege of being a long-serving member of the Board of Governors of the Arboreta & Botanical Gardens, representing the Third District. That group was "sunsetted" as budgets dictated and subsumed into the LACO Parks & Recreation Board, so the voice & advocacy for these special places has been muted. But our years of service reinforced the wonders and value of these four unique properties.

Virginia Robinson Gardens has been nurtured and supported by the County of Los Angeles since it was bequeathed by Virginia Robinson in 1977. The VRG has been a model exemplar of the public/private partnership between public treasures and charitable support groups for the forty years of the Friends' existence. Programming and public accessibility, as well as its ability to fundraise in order to lessen the burden on taxpayers, are part of the mission as designed by Virginia and long considered a settled matter.

Even with the changes proposed, Virginia Robinson Gardens will continue to be a small, limited access public garden. All visitors will still be required to have a reservation. There will still be timed entry only. There will still be no parking on Elden Way. All Special Events will still abide by the ordinances of the City of Beverly Hills. Our hours of operation from November to April will remain essentially unchanged because of the shorter daylight hours, as all Beverly Hills parks operate. And the Gardens will implement all the remediations and conditions required.

Finally, I want to remind you of a study done by the Trust for Public Land conducted in 2017 about the value of public parks and gardens in residential neighborhoods. The majority of Beverly Hills' parks are in residential neighborhoods. It should be reassuring to note the increase in property values that comes with their existence.

Sincerely,

Maralee Beck
Hillcrest Road
90210

Maralee Beck

85-1

Responses to Letter 85 – Maralee Beck

Response to Comment 85-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 86 - Jamie Wolf - September 2, 2022

From: Jamie Wolf <jrw@jamierwolf.com>
Sent: Friday, September 2, 2022 9:35 AM
To: Jui Ing Chien
Subject: Proposed changes to operating conditions at Virginia Robinson Gardens

CAUTION: External Email. Proceed Responsibly.

Dear Supervisors,

I want to point out that the opposition that's been voiced to these proposed changes almost invariably ignores the built-in limitations that accompany them... For instance, four events spaced out over a month (and more than four are explicitly not permitted) doesn't translate into constant partying or disturbing the peace of those within earshot, circumstances that tend to be predicted by the opponents of the any alteration. The evening events we envision have nothing to do with perfume promotions (as was suggested in the Beverly Hills City Council meeting in August) or personal profit or even a net profit for our 501c3 organization...and to suggest that they do or that they might is disingenuous.

What we're proposing for VRG is that we be given permission for nothing more than what Greystone routinely does. It's true that Greystone has a great deal more parking capacity than we do, but for the kind of evening event in question it's specified—again, very explicitly—that the guests for them will be using shuttles for arrival and departures, which argues against the constant slamming of car doors invoked as a potential consequence by the opponents of the changed hours, that there is no parking permitted on Elden Way, and that there will be an end point for these events at 10 pm. It's also specified in the regulations that these events can't be held for profit-making entities.

I'm a resident of Foothill Road, just below Sunset Boulevard, and the owner of two properties there. I don't think it would be inappropriate to point out that there are many residents of the county who don't happen to live in such a bucolic setting, and that certainly when it comes to daytime use, the slight adjustment of hours to conform with daylight savings time and the addition of Sundays so that these residents, too, can enjoy access to a county facility that has no admission fee and affords close contact with nature and the history of Beverly Hills is simply a matter of egalitarian balance.

Sincerely,

Jamie R. Wolf
812 North Foothill Road
Beverly Hills, CA 9021

Responses to Letter 86 – Jamie Wolf

Response to Comment 86-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 87 - Emina Darakjy - September 2, 2022

From: emina@earthlink.net
Sent: Friday, September 2, 2022 12:16 PM
To: Jui Ing Chien
Subject: Proposed Operational Changes at The Virginia Robinson Gardens

CAUTION: External Email. Proceed Responsibly.

Dear Honorable Board of Supervisors,

My name is Emina Darakjy, a member of the Virginia Robinson Gardens, a resident of LA County and President of the California Urban Forests Council.

I am writing in support of the changes that the Los Angeles County Department of Parks and Recreation is proposing in order to make the Gardens available to more community members to enjoy, continue to offer the valuable Hands On Science Education to school children and their teachers, and be able to share the history of the "First Estate Of Beverly Hills" with more visitors.

As you know the Virginia Robinson Gardens is listed on the National Registry of Historic Places and has one of the largest collection of King Palms that is growing in a natural setting in the whole northern hemisphere. The Estate also has a Coral tree that was designated as Historic Monument in 1976 and is registered as a "California Big Tree". This tree is the mother of all the coral trees that grace San Vincente Blvd. needless to say the Virginia Robinson Estate is a treasure that deserves to be showcased and used more often.

I am sure any new income generated from the increase in the number of events will be put to good use on projects that will benefit the community.

I am also confident that the Virginia Robinson Gardens and its friends will continue to be a good neighbor making sure there is a cap on the number of visitors in any one day, that all visits are by reservation only and encourage the use of public transportation and carpooling.

I am hoping you will find the requested changes necessary and approve the increase in the number and type of events that the Department of Parks and Recreation is asking for.

Sincerely,

Emina Darakjy
1044 Prospect Blvd.
Pasadena, Ca 91103

87-1

Responses to Letter 87 – Emina Darakjy

Response to Comment 87-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 88 - Tim Lindsay - September 2, 2022

Ms. Jui Ing Chien, Park Planner
County of LA Department of Parks & Recreation
1000 S. Fremont Ave., Unit #40 A-9 West, 3rd Floor
Alhambra, CA 91083

Dear Ms. Jui Ing Chien,

The Harry and Virginia Robinson Estate, currently known as “The Virginia Robinson Gardens (VRG),” was built in 1911, predating the incorporation of the City of Beverly Hills by two years. During its 66-year tenure as a private estate, the Robinson family built the foundation for what eventually became Beverly Hills. The Robinsons’ traveled the world with a botanist and collected rare and beautiful plants that still thrive on the 6.2-acre garden and in other parts of the city where they were introduced. The estate was used extensively by the Robinsons’ to entertain studio heads and legends of the silver screen. Likewise, they brought together heads of state and major players of corporate America. This was done in the spirit of benefiting the growth and development of society, with an emphasis on gentility and promoting philanthropic endeavors to benefit a global community. Furthermore, the underlining intent was to promote “fine living” and the advancement of the visual and performing arts.

Today as a public entity, programs echo the spirit of the family’s intent when it was deeded to the county as a house museum and botanical garden. The county, as the stewards of this historic property, not only have deeply invested in the estate’s physical restoration as a historic display garden and house museum, but have emulated the spirit of the family to build a strong community, while emphasizing the necessity to respect the past while embracing the future.

The Robinson Gardens benefits the community, including the immediate neighbors, by providing green space, resulting in positive gains in home values. For many local residences, it provides opportunities to volunteer as docents and participate in the many programs offered at VRG. One of the largest beneficiaries of this green oasis are the 2,000 elementary children, who annually visit the estate. While visiting the garden, they learn from trained docents about the value of a healthy eco-systems and the practice of planting and caring for vegetable gardens and the concept of eating wholesome-unprocessed, healthy food.

After the last expansion of the Supplemental Environment Impact Review (SEIR) in 2014, the Gardens hosted many additional events for both youth and adults. As the Superintendent of the VRG from 1997 – 2002, I witnessed a steadfast commitment to respect the integrity of the neighborhood by developing and implementing an extensive list of “Good Neighbor Policies.” These policies were reviewed and refined after each event, reacting to any concerns from the neighbors and event participants. Additionally, the county operates the venue following the Department of Interiors guidelines for Historic Buildings to further protect the historic narrative and integrity of the living and non-living collections.

The County Parks Department staff learned how to manage traffic and noise after the first expansion of the EIR in 2014, and are now poised and ready to remain sensible and responsible in executing the greater use of the property as proposed in the new SEIR. The proposed changes provide greater accessibility by offering longer hours and more open days. If adopted, this operational model will align

88-1

VRG with Descanso Gardens, in La Canada Flintridge, CA and The Huntington Gardens in San Marino, CA, both of which successfully operate in the center of residential neighborhoods, much like VRG.

Please support the proposed operational changes to VRG to allow greater accessibility to the house museum and gardens, allowing this national asset to be shared with all those who wish to experience its magic and grandeur. This is exactly what the Robinson family intended when they gifted their estate to the public in perpetuity to be operated as a house museum and botanic garden.

Most respectfully,

Mr. Tim Lindsay, Superintendent Emeritus

San Gabriel, CA 91775

88-1
cont.

Responses to Letter 88 – Tim Lindsay

Response to Comment 88-1

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 89 - Charles Alpert - September 2, 2022

Sent by Mail and EMAIL (jchien@parks.lacounty.gov)

ALL ISSUES RAISED IN THIS CORRESPONDENCE ARE INTENDED TO BE PART OF THE CEQA RECORD AND PRESERVED AS POTENTIAL CONTESTED MATTERS IN THE EVENT OF LITIGATION.

September 2, 2022

Ms. Jui Ing Chien
Park Planner
County of Los Angeles
Department of Parks and Recreation
1000 S. Fremont Ave.
Unit #40 A-9 West, 3rd Floor
Alhambra, CA 91083

re: DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT (DSEIR)
PROPOSED OPERATIONAL CHANGES AT VIRGINIA ROBINSON GARDENS (hereinafter referred to as the "GARDENS")
State Clearinghouse Number: 2012091034

Dear Ms. Jui Ing Chien:

We are submitting the following comments on the above-referenced DSEIR. This correspondence represents multiple signatories. While our comments are numerous, these remarks represent our collective, researched considerations which we ask the Department of Parks and Recreation ("DPR") and the Board of Supervisors to consider seriously.

SUMMARY

To provide an overview of our remarks, you will learn the following as you read our comments on the DSEIR:

- Legally, the terms of the Virginia Robinson Bequest represent the controlling authority for the operation of the GARDENS.
- The open-ended description of key elements of the proposed operational changes does not allow for the public to meaningfully and fully comment on the DSEIR.
- The environmental analysis in the DSEIR fails to provide a sufficient degree of information and analysis to allow a reasoned decision on the impact of the proposed operating changes.
- A botanical garden is not a park;¹ attempting to operate a botanical garden as a park will very likely create irreparably damage to the GARDENS.
- Far less environmental and socially impactful alternatives compared to the proposed project exist which will allow the County to achieve its stated goals.

¹ Even the LA County Ordinances recognize the GARDENS as a botanical garden, not a park. See, LA County Ordinance 2.26.170.

INITIAL COMMENTS

LEGALLY, THE 1977 VIRGINIA ROBINSON GIFT OF THE GARDENS TO THE COUNTY FOR USE AS AN “ARBORETUM OR BOTANICAL GARDEN AND FOR NO OTHER PURPOSE” CONTROLS – NOT THE ENVIRONMENTAL ANALYSIS, NOT ANY CONFLICTING OPERATIONAL DESIRES OF COUNTY DEPARTMENT OF PARKS AND RECREATION.

The storm cloud hanging over the DSEIR remains the giving by Virginia Robinson of the Gardens in the form of a Grant Deed (hereinafter the “Bequest,” the “Deed,” or the “Gift”) to the County of Los Angeles in 1977. The Bequest, the terms of which are specific, has barely a mention in the DSEIR only on page 1-1. Yet, California judicial rulings underscore how the Virginia Robinson Gift controls the operations of the GARDENS despite any conclusions of the DSEIR or any operational desires of the DPR.

Initially the specific terms of the Deed are instructive: (1) The Deed starts out with the following language: “As a gift and without consideration, I, Virginia D. Robinson, Grantor ...” (2) Then, the Deed states that the property “shall be held and used by [the County] perpetually for the purpose of an arboretum or botanic garden and for no other purpose inconsistent with said use.” (Underline added.) (3) Further, the Deed states that “no business for profit shall ever be conducted on said property.” (4) And the “... [the] property shall at all reasonable times be open and available for the benefit and enjoyment of the general public as an arboretum garden.” (5) Finally, the Deed states “upon the breach or violation of any of the ... conditions ... title to the whole of said real estate shall immediately vest in the City of Beverly Hills.”

89-2

In plain understanding, Virginia Robinson said to the County of Los Angeles in 1977, I am giving you the GARDENS as a gift. You may acquire title to my estate on Eldon Way in Beverly Hills, California for a public use as an “arboretum and botanic garden and for no other purpose.” Virginia Robinson did not say that the County may use the property any way it desires or sees fit. As we shall explain below, California courts will strictly enforce Virginia Robinson’s instruction.

To clarify more, the Robinson Gift involved a dedication of her property on Eldon Way in Beverly Hills for a specific use or purpose, “an arboretum or botanic garden.” The *American Law of Property*, (Casner ed. 1952), Sec 12.132, defines dedication as meaning “the devotion of land to a public use, an unequivocal act of the owner of [the property] that it [the property] shall be accepted and used presently or in the future for such public use.”

Thus, the County can legally use the GARDENS solely for a public arboretum or botanic garden – not as a park², a related commercial use, a performance center, a commercial photography venue, a catering center, and the like, being essentially a reflection of the proposed operating changes. Language on page 3-36 of the DSEIR even acknowledges this critical conclusion by

² This correspondence will further explain and explore below the important differences between a park and a botanical garden.

acknowledging: “The GARDENS was built in 1911 and has been a house museum and botanical garden for public use since 1980.”

Again, plainly stated, the GARDENS, the gifted, dedicated property, is “impressed with the use for which it was intended.” *Archer v Salinas City*, (1892) 93 Cal. 43, 51. The donor intended the GARDENS for use as a “botanic garden and arboretum.”

California courts have consistently determined that gift of land to a public authority must be used consistent with its intended, dedicated use.

“Where a tract of land is donated to a city with a restriction upon its use -- as, for instance, when it is donated or dedicated solely for a park -- the city cannot legally divert the use of such property to purposes inconsistent with the terms of the grant.” (*Spinks v. City of Los Angeles*, 220 Cal. 366, 368; *City and County of S.F. v. Linares*, 16 Cal. 2d 441, 446)” quoted as legal authority in *Big Sur Properties v Mott*, (1976) 62 Cal App 3rd 99.

More specifically, where property is acquired through private dedication, the deed is strictly construed. *Roberts v. City of Palos Verdes Estates*, (1949) 93 Cal. App. 2d 545, 547; *Griffith v. Department of Public Works*, (1956) 141 Cal. App. 2d 376, 380.

Further, local government is without the authority to divert the intended dedicated use. The *Griffith* case, supra represents an instructive example of how far strict construction applies to a dedication of bequest of land to government. In that case, the State of California sought to take 200 acres of Griffith Park in Los Angeles for a freeway. The Griffith heirs objected saying the land was dedicated to the city for the use as “recreation, health and pleasure.” The appellate court denied the City’s attempt to dismiss the case even though the grant deed did make an exception for a railroad to cross the park.

In *Slavich v. Hamilton* (1927) 201 Cal. 299, 303 [257 P. 60] the court reasoned: “the uses to which park property may be devoted depend, to some extent, upon the manner of its acquisition, that is, whether dedicated by the donor, or purchased or condemned by the municipality. **A different construction is placed upon dedications made by individuals from those made by the public. The former [dedicated property] are construed strictly according to the terms of the grant**, while in the latter cases a less strict construction is adopted.” (Emphasis added.)

In *Spires v City of Los Angeles*, (1906) 150 Cal 64, the court held that the erection of a building for a public library on land in a public park was a legitimate use of a portion of the property, but that the use of the building for other municipal purposes would amount to a diversion from the use to which the property was dedicated.

We also note, importantly, that in the *Spires case*, a resident and taxpayer of the City of Los Angeles, and the owner of certain property abutting on the public park, brought the lawsuit suit in an injunction action against the city of Los Angeles supporting the legal authority that nearby GARDENS’ neighbors and others will have status to legally question the proposed operating changes of the DPR.

89-2
cont.

89-3

To emphasis again, Los Angeles County received the GARDENS via a gift, not by purchase. In fact, a default beneficiary to the County, the City of Beverly Hills, is even named in the Deed should the County violate the Gift terms. The Gift contained a very specific public use directive: use the Gardens as “an arboretum and botanic garden.” No other inconsistent uses are permitted.

An environmental analysis cannot save or authorize an invalid use. In fact, such an analysis which proposes an inconsistent use may be the basis for a challenge to the County’s right to hold title to the GARDENS. (See, *Tiburon Open Space Committee v Marin County*, (May 12, 2022, A159860) __ Cal.Rptr.3d __ 2022 WL 198892) where the First District Court of Appeals reasoned the scope of environmental review must be commensurate with an agency’s retained discretionary authority, including any limitations imposed by legal obligations.)

To reemphasize, in *Slavich v. Hamilton, supra*, the court detailed “that land which has been dedicated as a public park **must be used in conformity with the terms of the dedication**, and it is without the power of a municipality to divert or withdraw the land from use for park purposes.” (Emphasis added.)

More recently, the court in *Save Mile Square Com v County of Orange*, (2001) 92 Cal App 4th 1142, relied on the *Slavich* decision as follows: “*Slavich v. Hamilton* (1927) 201 Cal. 299, 303 [257 P. 60] teaches that park uses are to be liberally construed where the land in question was purchased and dedicated to park purposes by a local government (**rather than received as a gift**).” (Emphasis added.)

While a county entity may have considerable discretion to use land it acquires by purchase, it does not, adhering to the *Slavich*, *Spires* and other decisions, have the same discretion for land acquired by a gift.

All the mentioned examples of special events in the DESIR include a definitive element of commercial enterprise and represent activities outside the terms of the Gift.

Using the facility for weddings, private parties such as birthdays, yoga classes, movie screenings and any activity the GARDENS’ Superintendent approves, whatever arbitrary use that may be, have no connection to a botanic garden or an arboretum.

The suggestion that the use of the GARDENS for the referenced activities are associated with fundraising for the County does not override the specific Bequest. Fundraising dollars and special event activities must by implication comport within the parameters of the Gift. Otherwise, the County could hold, for example, a circus, a perfume sales launch, or any other conceivable event at the Gardens and justify the event by declaring the proceeds would benefit Gardens. Logically, the fundraising argument effectively makes the stated use of the Gift meaningless.

How the California Legislature addresses a municipality changing or abandoning the use of land as a public park in Government Code Sections 38440-38462 is likewise instructive. Section 38442 of the Government Code specifically states: “this article shall not be construed to authorize: (a) A discontinuance and abandonment, or change in the use, of such lands which

89-3
cont.

89-4

will cause the reversion of the lands to private ownership or a forfeiture of the city's ownership in fee." Thus, while a city may discontinue the use of public park as a park, it may not do so if doing so will cause the land to revert ownership to another party. This legislative mandate is consistent with the court decisions which suggest dedicated land must comport with the terms of the dedication. The County's proposed operational uses does not comport with the Robinson Bequest.

The Bequest also included a sizeable endowment for operating the GARDENS. The endowment arguably considered what funds would support continued operations of the GARDENS. If the County finds those funds lacking, the Gift fails to permit an expansion of use under the guise of fundraising.

To conclude on this critical issue, the original Virginia Robinson Bequest states the GARDENS shall be used for "a botanic garden and arboretum and no other purpose." What the County proposes now falls well outside any reasonable interpretation of the Robinson Gift. The proposed operational changes, if implemented, legally jeopardize the County's authority over the GARDENS.

89-4
cont.

BY GRANTING IN THE PROJECT DESCRIPTION, THE GARDENS' SUPERINTENDENT THE RIGHT TO ARBITRARILY APPROVE ANY EVENT AT THE GARDENS, THE DEPARTMENT OF PARKS AND RECREATION PRESENTS THE PUBLIC WITH AN OPEN-ENDED PROJECT DESCRIPTION WHICH DEFIES AN ABILITY OF THE PUBLIC TO COMMENT MEANINGFULLY ON THE DEISR.

In correspondence dated December 13, 2021 responding to an LA County Department of Parks and Recreation (DPR) "Notice of Preparation of a Supplemental Environmental Impact Report (SEIR) for the Proposed Operation Changes at the Virginia Robinson GARDENS (VROB or "GARDENS"), numerous neighbors urged the DPR to engage in a full, fair, impartial environmental review process.

Unfortunately, DPR has failed to provide the public with an accurate, stable and finite project description so that the public could comment in a coherent, thoughtful manner. See, *Washoe Meadows Community v Dept Parks and Recreation*, (2017) 17 Cal App. 5th, 277.

89-5

Note also, *Stopthemillenniumhollywood.com et al. v. City of Los Angeles et al.* (2019) 39 Cal.App.5th 1, where the Second District Court of Appeal affirmed the trial court's conclusion that an EIR for a mixed-use development project proposed by Millennium Hollywood, LLC (Millennium) in the City of Los Angeles (City) violated CEQA as a matter of law, because it failed to provide an accurate, stable, and finite project description.

Consider deviation from the scope of operational changes provided in the DPR's Notice dated November 16, 2021, to the proposed project description that appears in the DSEIR for the Gardens:

Proposed Operational Changes at the
Virginia Robinson Gardens
Final Supplemental Environmental Impact Report

<i>Caption</i>	<i>Notice of Preparation 11/15/21</i>	<i>Project Description DSEIR 7/22/22</i> <i>Changes In Red</i>
Types of Events	<ul style="list-style-type: none"> In addition to existing events, consider family ceremonies such as weddings. 	<ul style="list-style-type: none"> Offer children's programming Schedule staff and public programming such as temporary exhibits, health and physical fitness activities, painting, wine, and cooking classes, etc. Institute subsidized musical and performing arts programs, and movie screening, Subject matter for events to be determined at the discretion of the Superintendent.
Special Uses	Up to 24 special use events/a year/approximately 2 per month	Up to 24 special use events per year; up to 4 events per month

89-5
cont.

The initial notice never defined "existing events" other than a reference to weddings, which are not currently conducted. Now belatedly, the DSEIR provides a litany of additional uses. Significantly the DSEIR also purports to allow the GARDENS' Superintendent authority to determine what events are acceptable. This arbitrary discretion, in itself, precludes "an accurate, stable, and finite project description so that the public could comment in a coherent, thoughtful manner." This openness is even more crucial when the Gift specifically limits the use of the GARDENS.

Other examples of a lack of an accurate, stable and finite project description analysis arise in this correspondence in the following areas: (1) the availability of 35 onsite parking is highly questionable and never clearly described; (2) the maximum capacity for a special event, implied as a certain level but never defined and, in fact, refuted below in this communication by information on the GARDENS' web page; and (3) a reference to protocols to protect the GARDENS, but no detail as to what the protocols entail.

The failure to define concretely the proposed operational changes undermines the ability of the public to comment fairly and completely, and is misleading and confusing as presented.

THE DPR PROMOTES NOTIONS OF ‘EQUITY’ AND “INCLUSION.” WHILE WORTHY CONCEPTS, EQUITY AND INCLUSION INHERENTLY CANNOT MANIFEST THE SAME WAY AT ALL COUNTY PARKS AND RECREATION PROPERTIES, ESPECIALLY WHEN THE ROBINSON GARDENS REMAINS UNIQUELY DIFFERENT IN CRITICAL LEGAL AND PHYSICAL ASPECTS FROM OTHER SIMILAR COUNTY GARDEN FACILITIES AND FROM ALL OTHER COUNTY PARK FACILITIES.

Los Angeles County Parks and Recreation currently operates the following botanical facilities: the Los Angeles Arboretum and Botanical Garden, Descanso Gardens, South Coast Botanical Gardens, and the GARDENS.

Ownership: As we have demonstrated above, ownership matters legally as to the manner in which the county can operate its facilities.

Note, the ownership differences in the various County botanical gardens:

- *The Los Angeles Arboretum and Botanical Garden:* The arboretum was founded in 1947 when the State of California and the County of Los Angeles jointly purchased 111 acres forming the start of the arboretum.
- *The South Coast Botanical Gardens:* In 1956, Los Angeles County purchased the land for the South Coast Botanical Gardens from the Great Lakes Carbon Company.
- *Descanso Gardens:* In 1953, Los Angeles County executed a four-year lease-purchase agreement with the owners of the property, the Boddy family.
- *Virginia Robinson GARDENS:* The County received the property by a bequest from Virginia Robinson, the owner, in 1977 along with an endowment of a million dollars for the GARDENS’ upkeep. She stipulated in the bequest that the property be used as a botanic garden and an arboretum.

As we have previously explained, the County must operate a bequeathed property in a more circumspect manner than property the County acquires by purchase.

Size: All County operated botanical facilities exceed the acreage of the GARDENS by 14 to 25 times. The GARDENS is only 6.5 acres. By comparison, the La County Arboretum and Botanical Gardens is 127 acres; the South Coast Botanical Gardens is 87 acres and Descanso Gardens is 150 acres.

Only the GARDENS is entirely embedded in a residential neighborhood. Except for the GARDENS, the other County botanical gardens have large onsite parking facilities or in the case of South Coast Botanical Gardens, the use of an adjoining church parking lot. The GARDENS has, at most, 35 parking spaces and likely far less as this correspondence will detail below.

Beyond physical limitations, as a dedicated botanical garden, the GARDENS is inherently different from any park. Here are four critical differences between a park and arboreta/botanical gardens:

1. Parks are intended mostly for recreation vs. arboreta/botanical gardens which focus on plant science research, education, conservation, and horticultural display.

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2. Parks have functional landscapes and plantings such as playing fields and picnic groves, vs. arboreta/botanical gardens' curated labeled living collections, interpreted exhibits, and managed habitat areas.
3. Parks encourage sports and dog walking vs. arboreta/botanical gardens where sports and pets are not permitted.
4. Parks typically trend toward monoculture with little biodiversity (with exceptions for managed natural areas) vs. arboreta/botanical gardens, which are typically high in biodiversity.

89-7
cont.

In sum, trying to socially equalize County operations, many with different purposes and physical attributes, compared to the GARDENS inherently creates unmitigable and significant environmental and social impacts which the DSEIR fails to discuss in any meaningful way and which the County DPR also fails to account for in its proposed operational changes.

THE DSEIR FAILS TO PROVIDE A SUFFICIENT DEGREE OF ANALYSIS FOR VIRTUALLY ALL POTENTIAL ENVIRONMENTAL IMPACTS DISCUSSED; COMMON DEFICIENCIES INCLUDE INCOMPLETE ANALYSIS, MISSING MATERIAL INFORMATION, CONCLUSIONS WITHOUT SUPPORT AND A GENERAL TENDENCY TO ANALYZE WITH A BIASED TO AN END RESULT.

An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. (Emphasis added.) CEQA REGULATIONS 15151.

- **The specific comments below on DSEIR Virginia Robinson GARDENS, on a section-by-section basis, demonstrate that the DSEIR fails to provide a complete and sufficient degree of information and analysis to enable the County Board of Supervisors to make a decision which intelligently takes account of environmental consequences.**

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INTRODUCTION

- 1-1. *The County works in partnership with the Friends of Robinson Gardens to preserve the estate for the public to enjoy and experience.*

The DSEIR fails to mention key details about the operation of the GARDENS and the County's relationship to the Friends. The arrangement is not a partnership. The 1988 Operating Agreement (the "Agreement") between the Friends of the Virginia Robinson Gardens (the "Friends") and the County specifically provides in section 8,01 of that Agreement that the Friends is an independent contractor, at all times. **An independent contractor is not a "partner."**

While the Friends purportedly raise money to the benefit of the GARDENS, the Friends command the events at the GARDENS to the extent that much of the time the GARDENS

becomes effectively a non-public, private organization dominating, even monopolizing, a public facility.

Any historic analysis of the events of the GARDENS will demonstrate the monopolization of the GARDENS by the Friends. The DSEIR should include such an analysis. Even events open to both the public and the Friends are priced to discourage public participation or to have little interest to the general public, but interest to the Friends' membership.

Further, tax filings on behalf of the Friends indicate that a significant portion of the fundraising for the Friends historically reflects administrative costs as we will detail below. The DSEIR fails to mention any of the information about the financial operations of the Friends; yet the document highlights its financial involvement.

The DSEIR fails to analyze and discuss that the bequest to the County makes no mention of any supporting organization or that the County would be working in "partnership" with the Friends to run the GARDENS. This "partnership" likely violates the Bequest. The Robinson Gift was not a joint bequest. As will be discussed subsequently, the entire operation of the GARDENS as a "partnership" subjects the County's operation to legal challenge. A copy of the Gift as evidenced by the Deed should be included as a document incorporated into the DSEIR.

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Looking at that partnership, more closely, particularly given the County's expressed desire for inclusivity and equity, one must question the desirability of this championed "partnership." To become a member of the Friends, the base membership starts at \$1750.³ Even if you are willing to contribute this entry amount, you must also have a recommendation from an existing Friend. These entry criteria do not reflect an organization that endorses "equity."

Even the fund-raising programs that the Friends sponsor are not for the masses. Consider their annual fundraising Garden Tour. Here is the pricing for the 2019 Garden Tour: admission pricing from \$250 to \$7500 plus \$40 for valet parking. Note, even the Garden Tours include a commercial element, contrary to the Bequest, with boutiques selling commercial goods. See, <https://www.robinsongardens.org/2019-garden-tour/>

One would expect the County would want its "partners" endorsing and supporting its key policy objectives. More on the Friends subsequently in this correspondence. The critical conclusion is that the DSEIR contains none of this material information.

1-1. *The GARDENS are home to about 150 bird species and have been designated by the National Wildlife Federation as an official Certified Wildlife Habitat Site. This certification requires that green spaces provide four basic elements that all wildlife need: food, water, cover, and a place to raise young. The GARDENS serve as an urban forest, providing valuable air pollution removal and carbon sequestration.*

The wildlife "certification" described represents a "self-certification." No independent verification underlays the alleged characterization in the DSEIR. The statement merits

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³ Since the announcement of the operational changes, the Friends have introduced a "Societal Membership" starting at \$75.00 for an individual. That status does not equate to making you a member of the Friends. See, <https://www.robinsongardens.org/memberships/#membership>

appropriate qualification. As the following details, the proposed operational changes even ignore the environmental consequences to the wildlife claimed as the basis for the noted-certification.

Consider the statement in the DSEIR that the GARDENS serves as “an urban forest, providing valuable air pollution removal and carbon sequestration.” In fact, the dominant tree species in the GARDENS are palm trees. Palm trees, however, offer little shade (and canopy) to urban heat islands and capture very small amounts of carbon.

A common tree canopy measurement in support of climate control is a canopy of 25%. The American Forests even recommends a canopy of 35% in the dry US western states. Given the building structures, driveways, hardscape, tennis courts, grass lawns, swimming pool, and palm grove, the GARDENS do not meet this critical 25-35% canopy standard. Again, the DSEIR offers a misleading and unsubstantiated picture of the environmental merit of the property.

If the statement is true, a vital discussion is absent from the environmental evaluation. Increasing the events, especially those in the evening hours and the increase in the amount of people proposed for the GARDENS, the DSEIR must address, but does not, the impacts this visitor increase will have on the wildlife and on the flora and fauna of the GARDENS. Lights, noise, cars, people and the like associated with increased use will certainly diminish bird habitation and threaten the plantings in GARDENS.

Ironically, at least one neighbor, was asked by the GARDENS’ Superintendent to turn off her outdoor lights to protect owls habituating in the GARDENS. Owls must know that wedding and party lights are different from residential lights.

- 1.1 *The GARDENS offer educational programming and tours to children from elementary schools in Beverly Hills as well as schools located in lower-income, underserved communities across Los Angeles County.*

While this education training is unquestionably valuable and highly encouraged, such educational programming is, by financial commitment and by programming, one of the least (or smallest) programs at the GARDENS. Compare the discussion of the Friends’ events on the Gardens’ website to the information on the education program. Per the website, the program only supports a maximum of 41 students/school day and not every school day. Again, the DSEIR does not quantify but rather offers overstated or unsupported statements.

Note, we support use of the Gardens as an educational classroom for underprivileged school children. That is not what is proposed, however.

- 1.2 *DPR is preparing this SEIR to analyze the potential environmental impacts of the proposed operational changes (Proposed Project) that would meet current objectives of inclusivity and accessibility and adhere to DPR’s mission to serve as stewards of parklands, build healthy and resilient communities, and advance social equity and cohesion.*

If the County DPR wants to enhance inclusivity, accessibility and social equity, the County should cease its relationship with the Friends which operates as an exclusive, private social club

89-9
cont.

which dominates the events at the GARDENS. Here are some of the historic activities that the Friends host at the GARDENS: gingerbread house decorating class, fashion shows, jewelry events, lectures on Egyptian pyramids, and so forth.

No justification or quantification exists in the DSEIR to establish that the proposed changes will enhance any of the goals stated by the DPR. Indeed, the DSEIR notes that average Gardens attendance is 20 visitors/day. Given an authorized capacity of 100 visitors per day, logic compels maximum existing use before doubling attendance. Again the DSEIR provides no explanation or discussion.

- 1.3 *The proposed change in operating hours of 9:30 a.m. to sunset Monday through Sunday would enable the GARDENS to serve the needs of more school children and the general public.*

Operating the GARDENS on Sunday or staying open until sunset everyday will not serve the needs of school children who are home from school well before sunset and likely do not attend Title I schools on Sundays. None of the other County operated GARDENS or arboretums remain open until sunset year-round. These extended hours have no merit whatsoever in a residential environment.

Somehow the DPR thinks the GARDENS has a scenic sunset view. Nothing could be further from the truth. Topography and surrounding development make the sunsets very brief and unmemorable. After all, the ocean is more than five miles away from the GARDENS.

PROJECT DESCRIPTION

2.2.3 *Special Use Events*

The information in this section is misleading or incomplete. Note the following:

- In the past, and likely, into the future, the GARDENS has encouraged street parking to attend GARDENS' events. Note, the following event information posted previously on the GARDENS' website: *"Limited parking: 25 spaces are available in the parking lot by the Pool Pavilion. If more than 25 spaces are needed, options are: (1) Uber/Lyft/taxi; (2) park on Crescent (a nearby street) and walk to VRG, or (3) valet parking."*
- The City has the right to deny any valet parking permit, which may well be the situation for the proposed 24 events/year.⁴ Offsite valet parking has been used sparingly in the past for events at the GARDENS. The particular offsite parking venue used one-time for a fundraising event is city-owned and currently used for City sponsored events. No mentions of these facts exist in DSEIR;
- Offloading deliveries on Cove Way only creates impacts on another residential streets and does not mitigate the impacts. Again, the DSEIR ignores;

⁴ Note, 4-8-7 of the Beverly Hills Municipal Code notes that special events in the city must be conducted without any adverse impact on the public.

- Per past web postings, the GARDENS does not require the use of preferred rental companies for events – the Gardens only offers those recommendations if requested;
- Per the DSEIR: “sensitivity to the effect on the neighbors and the protection of the artifacts on the property itself are carefully considered when planning each event.” Most of us have lived directly adjacent to the GARDENS for many years. The GARDENS has never contacted us in advance about upcoming events. Advance contact will not matter if concerns are ignored, which is the likely result given the conclusions of the DSEIR;
- No monitoring of street parking or vendor parking has ever existed by the GARDENS outside of its driveway. Rather the opposite results. As noted, the GARDENS directs event attendees to “park on Crescent (a nearby street)”;
- Past understandings have restricted special uses to fundraisings events. Events such as weddings, private birthday parties, and the like have been prohibited. Such events have been held in the past for many valid reasons and not be held in the future. The holding of such events likely violates the Bequest of the GARDENS to the County as well as creates impacts which cannot be mitigated.

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cont.

2.3 *To this end, the primary goal of the Proposed Project is to increase public access to the Virginia Robinson GARDENS and enable more Los Angeles County residents, especially families and children, to enjoy and Proposed Operational Changes at the Virginia Robinson GARDENS Draft Supplemental Environmental Impact Report Project Description Virginia Robinson GARDENS 2-5 July 2022 2017-276.009 experience the GARDENS.*

Only current and past mismanagement of the GARDENS can explain any lack of ability of families and children presently to enjoy the GARDENS. No documentation is offered to support this conclusion.

89-11

The County DPR has demonstrated during the interim period between the announcement of the proposed changes and the issuance of the DSEIR that it can meet these stated goals. The GARDENS has increased family events and onsite botanical related classes without any operational changes. The predicate for these changes rest on a dubious, unsupportable premise.

2.4 *The operational changes propose to expand the level of public use of the Virginia Robinson GARDENS by extending the hours of operation and days, types of programs, and use of public transportation.*

The operational changes do nothing to expand the use of public transportation. Only one Metro Bus Route serves the GARDENS, Sunset #2. That bus line runs from Downtown Los Angeles to Westwood. The closest public transportation drop point for this bus route is approximately ½ mile away and involves an uphill walk to the GARDENS – hardly encouraging for families with small children, senior citizens, guests to a wedding, and other special events at the GARDENS.

89-12

2.4 *The Proposed Project would increase equitable access to the larger community to enjoy these assets. In addition, the increased number of Special Use Events would generate*

89-13

critical revenue for the GARDENS, to offset the costs to operate and maintain this historic landmark. (Emphasis added.)

Interestingly, at one of the public meetings hosted for the neighborhood around the GARDENS in support of the Proposed Project, the lead DPR representative stated empathically: “The County has plenty of money to operate the GARDENS. **We [the County] do not need additional revenue.**” And yet, the County now wants the neighbors to believe the County will run the GARDENS under the new operating rules in a responsible way.

If the County cannot afford the GARDENS, it should rescind its acceptance of the Gift and allow the GARDENS pass ownership per the Deed to the City and not turn this “historic landmark” into a rental catering venue and park.

If nothing else, the DSEIR should discuss the County’s finances as it relates to the GARDENS. The Bequest says nothing about the GARDENS having to be able to pay its own way. Rather, the Bequest implies the County will preserve the GARDENS as a botanic garden and arboretum. Accepting the Gift, the County has accepted the financial obligation to maintain the Gardens.

Additionally, the general public will not enjoy any real value from increased special events. Weddings, birthday parties, bar mitzvahs, and the like will cost the host a steep premium. With virtually no onsite catering facilities, all equipment must be imported and exported after the event [to the before-and-after multiple-day nuisance detriment of the neighborhood] from tables, chairs, linen, a dance floor, portable bathrooms, sound equipment, food, liquor, lights, and more. Plus, the host must pay for valet parking, offsite parking (as the city may very likely ban any valet parking on adjacent streets) and security. All in addition to the rental fee. These special events will not be for the everyday person, rather more likely for the patrons of the Friends and wealthier members of the community. The DSEIR addresses none of these issues.

Notably, the charge for these private activities will likely generate minimal revenue to benefit the GARDENS. Typical wedding reception rental charges, using other County facilities as a measure, are currently \$2000 to \$5000/event. Remember that the GARDENS offers minimal to no event support in terms of party needs and equipment, like tables, chairs, linen, serving utensils and so on. The GARDENS can only charge basically a property rental value.

In total, 20 additional special events like weddings or birthday parties, based on County rates at other facilities, are likely to net merely \$40,000 to \$100,000 in revenue less any County costs for staffing and services for these events. This hardly justifies the impacts generated from the traffic and parking for these events. The cost for preparation of this DSEIR likely approaches or exceeds the amount of revenue generated by these special uses, plus these events are outside of the terms of the Robinson Bequest. Moreover, city personnel suggest the operating costs for the Garden equate annually to \$1 million. The above generated revenue hardly diminishes the tax burden. Better management likely could identify equal or larger saving.

Again, the DSEIR just assumes a significant finance benefit rather than demonstrating the benefit.

89-13
cont.

2.4 *The Proposed Project does not include any ground disturbing activities normally associated with grading, demolition, or construction.*

89-14

Not true. Every special event will involve light construction from placing dance floors over the pool to installing tents or overhead lighting.

2.4.1 *By allowing the GARDENS to welcome the public until sunset, as most other public GARDENS and parks do, students and the public would have greater access.*

Too bad the DPR did not read the prior public comments related to scoping. In those comments, you will find the following information about the other similar botanic gardens and arboretum operated by the County. **None have year-round operating hours until sunset.**

Descanso Garden Flintridge, CA	9 AM to 7 PM Shorter hours in winter (5PM)
South Coast Botanical Garden Palos Verdes Hills, CA	8 AM to 5 PM
Los Angeles County Arboretum and Botanical Garden Arcadia, CA	9 AM to 4:30/6:30 PM Depending on day of week. Shorter hours on weekends.

89-15

Yet the DSEIR now suggests that the GARDENS, which sits entirely surrounded by residential, a much smaller acreage, merits longer operating hours, until sunset, every day of the year. The opposite is true and should be fully and fairly discussed in the DSEIR. To repeat, the Deed notes that the GARDENS must be operated during “reasonable times.”

Students will not benefit from the expanded hours as schools end during the current operating hours of GARDENS. Again, no demonstration exists of this assertion.

2.4.3. *The Proposed Project would increase the number of daily visitors from 100 to 200.*

Why 200, when the actual demand is 20 persons/day? Where is the additional hypothetical demand?

The daily visitor count should reflect the actual parking situation at the GARDENS. 200 visitors at two persons per car means 100 cars/day for a parking lot that at most holds 35 cars for public parking and more likely less than 25 spaces. The access driveways are narrow as well. The parking situation is tight under current usage. A fact that escapes the DSEIR.

89-16

Having timed visits by visitors hardly helps if the visitors decide to stay longer and enjoy the property beyond any tour. Isn't that a goal of the DPR, to have people appreciate the Gardens?

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cont.

The DSEIR fails to address the parking when it talks about increasing the daily visitor situation. The two issues are mutually dependent.

2.4.3 *With the Proposed Project the GARDENS would continue to offer daily programming, including . . . health and physical fitness activities, painting, wine and cooking classes etc. Subsidized musical and performing arts programs would be offered as well as movie screenings.*

89-17

The DSEIR fails to address whether the original Virginia Robinson bequest to the County supports the use of the VROB Garden as a private catering, seminar, filming location, spa and private family event venue. These uses represent "commercial" uses and likely constitute a legal forfeiture of the bequest requiring the County to divest control of the Garden. These events do not support the use of the GARDENS as a "botanical" center.

2.4.4 *The Proposed Project includes up to 24 special use events per year (up to 4 events per month). Four special use events are allowed currently.*

The six-fold increase in special events has no supportable justification and represents an egregious attempt to disrupt the reasonable enjoyment of the peace and quiet in a historical residential neighborhood. Stopping musical activities at 10 PM will not stop the noise from these events. Notably, the DPR does not offer to halt all events at 10 PM.

The rationalization for additional events is a commercial one and not a public one. According to the DSEIR, *"the proposed increase in the number of special events would improve the fundraising that supports the educational programs and maintenance of the GARDENS. Private event rental is a vital means for raising funds to sustain the operations of facilities like the Virginia Robinson GARDENS and lessens the tax-payer burden."*

We must underscore the GARDENS has operated for more than 45 years without the necessity of turning to commercial activities to raise funds. The offered explanation for the six-fold increase is specious and hypocritical given public statements of DPR representatives that the GARDENS has ample funds to operate. (See previous comments.)

89-18

If the County wants to justify its changes on a revenue need, it is only proper that DSEIR include the existing budget for the GARDENS and the entire DPR. Existing budget savings may well provide a way to operate the GARDENS without the necessity of a six-fold increase in "special events." Show the public the numbers before the County abdicates its responsibility to live within revenues generated from tax dollars. We will demonstrate subsequently that relying on these outside commercial funding sources results often in a detriment to the public stewardship of valuable public donations.

In effect, the DPR admits that they intend to turn the GARDENS into a commercial rental venue for private events. This would violate the terms of the Virginia Robinson Bequest to the County, which the DSEIR again fails to address adequately or in any meaningful way. More importantly, if the County does not have sufficient tax funds to operate the Garden in a lawful and proper

manner, the County should rescind acceptance of the Bequest and allow the City of Beverly Hills to assume ownership and operations of the GARDENS.

If the expansion to 24 events will “lessen the tax-payer burden,” asserted, the DSEIR should quantify this savings and indicate how property taxes will decrease as a result. This justification is not only outlandish but insulting, particularly given the one-million-dollar endowment which accompanied the Bequest, intended to offset operational costs.

2.4.5 Parking on the property will remain the same (35 spaces available)

The 2012 DSEIR indicates that the GARDENS only has 22 upper parking spaces, not 35, for all uses: visitors, staff, docents, and event support staff (caterers, servers, musicians, etc.) No new paved parking has been constructed since 2012.

Stack parking does not explain this sudden increase from 22 to 35. Stack parking creates its own set of chaos and impact which the document fails to address.

Subsequently, the DSEIR reports on page 3-55 that “an average of 6 volunteers are on site daily. In addition to the volunteers, approximately 10 maintenance staff are onsite per day.” This accounts for sixteen vehicles. So even if 35 spaces are available, volunteers and maintenance staff eliminate on average 16 spaces, leaving 19 spaces serving 200 visitors.

In fact, the GARDENS has less than 35 spaces. The DSEIR does not identify by photos the increased parking. The 2012 SEIR documents show photos of only 20 parking spaces. This fictional parking numbers game is a shill.

Street parking is not an option. At a recent public hearing, the Beverly Hills City Council expressed an interest in enforcing parking bans on area streets if the County significantly increased special events at the GARDENS. Residents on nearby streets, under city rules, can implement permit parking only and no parking bans on all adjacent streets for special events and all activities at the GARDENS. See, Beverly Hills Municipal Code 7-3-206. This opportunity means that the GARDENS would need to limit its activities to events that can be served by “35” parking spots (which effectively equates to 20-22 parking spaces). Conveniently the DSEIR wears blinders to these facts and avoids any discussion of the crucial issue.

Shuttle services are not the answer, nor does the DSEIR explore the availability of shuttle services or offsite parking. The closest location would be Greystone Manor, a Beverly Hills City facility. That facility currently has its own activities and needs for parking. Moreover, logic dictates that the City Council would not support moving one traffic issue in a residential neighborhood at the Gardens to another residential neighborhood at Greystone.

Lastly, services like Lyft and Uber are not meaningful alternatives. Eldon Way and other nearby residential streets, cannot accommodate hundreds of ride-service vehicles to a special event at the GARDENS or even 200 round trips/day. Drop-off and especially pick-up would be totally chaotic. More importantly, while these services may ease onsite parking needs; they only compound noise, traffic and greenhouse gas impacts.

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The DSEIR conveniently ignores all the ramifications and impacts generated from the six-fold special events increase and doubling the daily attendance. This issue reflects a significant unmitigated impact which the DSEIR ignores and suggest, by implication, that the County also ignores. Traffic and parking are inseparable impacts.

89-19
cont.

ENVIRONMENTAL REVIEW

3.2.1 *Therefore, any views of the Project Site from public streets are obstructed, except from the terminus of the Elden Way cul-de-sac at the entrance of the Project Site.*

Inaccurate. The GARDENS, particularly the Rose Garden and Palm Grove, is directly visible from Carolyn Way. One can see and hear the traffic on the service drive to the GARDENS' parking area from Carolyn Way. The service drive also winds directly behind homes on Carolyn Way. Apparently, neither the County staff nor its consultant bothered to travel or walk the streets bordering the GARDENS.

89-20

3.2.3 *The increased number of visitors moving through the surrounding neighborhood would create a new, short-term, visual element to the project area.*

Doubling of attendance daily (100 to 200),⁵ extending operational hours, extending days of operation to 365 days/year, is by definition hardly a "short-term" nor just a visual impact. Remember, the GARDENS' website even advises visitors to park on Crescent Drive and walk to the GARDENS. Common sense suggests 200 people a day, every day, in one's neighborhood either on foot or in a car as a potential aesthetic, noise, and fundamental disruption to the peace and quiet of an entirely residential neighborhood. Remember the proposed operations include extending the hours and days of the GARDENS' operation. This "short-term" impact will be a 365 day a year impact.

Traffic and parking are also an all-day visible issue for the neighborhood around the GARDENS. As previously noted, but importantly repeated, the DSEIR does not demonstrate how the GARDENS can suddenly accommodate 35 cars when the 2012 SEIR indicates that the GARDENS only has 22 parking spaces for all uses: visitors, docents, event support staff (caterers, servers, musicians, etc.). Photos in the 2012 SEIR even show parking in an ordinary manner equals less than 20 spots. Larger numbers (20-25, not even 35) seemingly can be reached in an irregular fashion, stack parking, which poses other risks in the event of an unanticipated emergency. Hocus-pocus is not a solution to onsite parking.

89-21

Onsite parking for normal days will not accommodate the 200/day visitor limits the County projects either. Per the DSEIR's estimate of 2 people/car, and using the 2012 SEIR, which remains the only definitive discussion of available parking, 200 people/day for garden tours will require 5 shifts and 5 tours per day. Given that a tour is 1.5 hours and people may stay longer, 5 shifts imply a need for 10 hours/day every day of the year and perfect coordination of cars coming and going. What if a visitor stays beyond the tour time? Cars may not come and go in

⁵ In actually, the 200 visitor per day limit is actually a ten-fold increase in attendance. The DSEIR indicates average daily attendance is 20 visitors/day.

timely shifts. What if people come early? The obvious answer is that visitors will park on nearby streets. The DSEIR ignored this obvious inference.

The parking situation for special events is even more problematic. Using the County's indicator of maximum attendance on its website, the private events page, removed just prior to the announcement of environmental review process, notes the following capacity for a special event is as follows:

Pool Pavilion – 50 Capacity
Rose Garden – 60 Capacity
Great Lawn – 300 Capacity
Back Terrazzo Patio – 75 Capacity
Tennis Court – 300 Capacity (seated)
Poolside – 40 Capacity (per side)

Note: this capacity could be achieved by simultaneous multiple events or one large event. One must rely on maximum capacity when no specifically proposed operating capacity limits for special events exist.

A max event, therefore, could entail 865 participants plus catering support staff of 86 (10 per 100 guests). Then, one needs to account for the valets, County staff, musicians, deliveries, rental trucks, security, docents, clergy, etc. How will 22 parking spaces for cars, or even 35, account for vehicles for approximately 1000 visitors? The GARENS parking onsite cannot come close to this demand for a large event or even maximum daily attendance of 200, nor can the neighboring streets.

Where will the excess people and their cars park? The DSEIR indicates the use of valet street parking or offsite parking. In fact, past practice shows remote lots are rarely employed – mostly because none exist in a reasonable vicinity of the GARDENS. Street parking is the past norm for valet GARDENS' special events and highly disruptive. The nearby residential streets cannot accommodate safely the number of cars a special event of 1000 people and staff or even a few hundred will generate. The DSEIR makes no contrary demonstration.

Moreover, valet parking in the City of Beverly Hills requires a city permit which may not issue 24 times. A private residence in the area would not receive 24 valet parking permits a year. Such multiple grants may not happen particularly if neighbors object. Yet, the DSEIR does not address any of these concerns.

Where is the parking for special events service employees and service vehicles? Large vehicles do not have access to the GARDENS' drive. In the past, the neighboring streets have served as parking for such vehicles. This adds to the vehicle count and should have been included in the analysis.

The DSEIR should have addressed the impact of the current parking restrictions on neighboring streets of a 2-hour limit for Crescent Drive upon the proposed use of the GARDENS. No County rule dictates visitors must stay two hours or less. Similarly, the draft SEIR should address a possible future street parking restriction to 1 hour parking, or even Permit Parking only, or no

89-21
cont.

parking -- in lieu of the current parking restrictions. A ban on valet parking in the neighborhood is also possible.

89-21
cont.

In sum, the simple conclusion of the DSEIR represents a failed analysis and an incorrect conclusion of impacts.

3.2.3 *The lighting would be directed toward a specific area of the Project Site, and since the Project Site and the other properties in the area are located on large parcels, the amount of light spillage onto neighboring residences would be limited.*

Not true. Lighting is visible to homes that have a higher elevation from the GARDENS. Also, nighttime lights are highly visible throughout the hillside particularly to the neighborhood north of the GARDENS.

89-22

Even without this local impact, light pollution is a separate and legitimate environmental impact which the DSEIR fails to mention, much less address. Light pollution is a particular concern in Los Angeles due to its geographical tendency to trap coastal haze and refract light more dramatically. Also, lighting will have an adverse impact on the hundreds of birds and wildlife species that the DSEIR references. Again, the DSEIR dismisses this issue without any discussion. The discussion of this issue is inadequate, at best.

3.4 *... there is no likelihood of the Project traffic exceeding CO values. This impact is less than significant*

Sometimes the type of analysis one does for a major commercial project does not fit the local impact to a residential community. The analysis may fit the SCAQMD guidelines but may not truly reflect the added burden of a degraded environment in the immediate vicinity of the Gardens.

The DSEIR included no baseline air quality monitoring of the location, no computer modeling, no standard methodologies to quantify air quality impacts. Rather the DSEIR relied on area/regional studies, some, like a CO hot spot study conducted in 1992. The consultant did no field air quality measurements in the area to calculate how tens of thousands of additional vehicle trips triggered by the proposed operational changes would impact the micro air quality.

89-23

Notably, our scoping comments included the following remarks (unfortunately ignored): "Any analysis of Traffic should focus on the local streets surrounding the Garden and not the I-405 or other major freeways. The following intersections are most relevant for study:

1. Benedict Canyon Drive and Lexington Road
2. Hartford Way and Lexington Road
3. Oxford Way and Lexington Road
4. Elden Way and North Crescent Drive
5. North Crescent Drive and Lexington Road
6. North Beverly Drive and Lexington Road

7. Rexford and Crescent Drive
8. Beverly Drive/Rexford Drive (Turn-off to Coldwater Canyon)
9. Cove and Hartford
10. Crescent Dr. and Sunset
11. Rexford and Sunset
12. Alpine and Sunset
13. Laurel Drive and Beverly Drive
14. The use of the long circular driveway on the Garden property."

In *Sierra Club v Fresno*, (2018) 6 Cal 5th 502, the court ruled that an EIR must either make a reasonable effort to correlate a project's significant air quality impacts to potential health consequences, or explain why providing such an analysis is not feasible. Here, the analysis was feasible as suggested in the scoping comments, but the agency and its consultant effectively made no effort to quantify the air quality impacts nor the associated health impacts on a local area basis, the impacted location. Instead, they hid under the cover of dubious regional and extended area studies years old.

The DSEIR is not only deficient but derelict on the air quality/health impacts from the tens of thousands of vehicle trips that its proposed operational changes will generate to the GARDENS.

3.5.3 *Existing protocols and precautions to protect the integrity of the structures and GARDENS will ensure that existing vegetation remains undisturbed by the proposed increase in visitors. Common wildlife would continue to benefit from the habitat that the GARDENS provide, and the biological functions and values associated with the existing environment would remain unchanged. A less than significant impact would occur.*

This section is interesting in that it openly indicates that the GARDENS from a biological perspective is not significant. This section notes that no notable wildlife or plant species exist on the property. What about the Coral Tree or the Palm Forest? What about the GARDENS' wildlife certification and all the wildlife identified therein?

Here is how the GARDENS website describes the property: *"The estate offers rich fertile soil and a favorable climate. In fact, more plant species can grow outdoors on the estate than anywhere else in the continental United States"* If this description is accurate, a more complete discussion is necessary to evaluate impacts from excessive human visitation to the property resulting from a six-fold increase in special events and to ten times daily attendance increases. To translate, a special event can accommodate 1000 visitors and service staff. Twenty-four events translate to a potential influx of 24,000 people to the GARDENS. This impact certainly merits a discussion rather than a blanket dismissal.

The section references existing protocols to protect the GARDENS. What are these protocols? Are the protocols sufficient to protect the vast plant species noted? What about the 150

89-23
cont.

89-24

varieties of wildlife? If all this wildlife offers no uniqueness, why did the GARDENS seek a wildlife certification?

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cont.

The biological analysis is both contradictory and incomplete.

3.6.3 *Character-defining features within the Virginia Robinson GARDENS would continue to be protected from direct and indirect actions of patrons under Special Use Event use guidelines, which has successfully occurred for decades.*

Interestingly, the DSEIR "Special Use Event guidelines" are not enumerated in the document.

Remember that currently only four special events/ year can take place. That number will increase to twenty-four/year. A six-fold increase in enforcement risk exists. That increase alone questions whether any guidelines, not even rules, will be followed meaningfully in the future.

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The GARDENS' website suggests how the event rules and regulations will be followed: "Rules and regulations must be followed by all event participants, including planners, vendors and guests. Contracting party must inform any independent contractors it hires of VRG's rules & regulations." In short, the bride and groom, who will have no other focus at the event, must enforce the rules. This approach may have worked for four events/year, but the addition of private events will certainly increase the likelihood of an adverse impact.

Note also the effectiveness of the rules, such as this example: "High, stiletto shoes are strongly discouraged," but not prohibited. Is this shoe restriction one of the guidelines?

Again, the cultural section fails to adequately discuss key impacts to the GARDENS.

3.7.3 *Energy impacts are considered to be significant if the project would result in any of the following: a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation...*

A potential unnecessary consumption of energy sources may present at the GARDENS. The GARDENS, being located in Beverly Hills, has an energy supplier option. As an electrical consumer in Beverly Hills, the GARDENS can get its electricity from SC Edison or from the Clean Power Alliance.

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The Clean Power Alliance is a California locally-operated clean electricity provider for communities across Los Angeles and Ventura Counties. Beverly Hills belongs to the Clean Power Alliance. Therefore, the GARDENS has the option to receive power from the Clean Power Alliance and secure 100% of its electricity from renewable sources. The DSEIR neglects any discussion of this important significant impact of energy impacts.

3.9.4. *... the SCAQMD's 3,000 metric tons of CO₂e per year threshold is used as the significance threshold ...*

Despite the "threshold" set by the SCAQMD, it does seem important for a decisionmaker to determine what amount of greenhouse gas will emit from a project change given the significant impacts global warming affects not only the Los Angeles basin, but the nation and the world.

89-27

For this project, the most significant element for greenhouse gases will be transportation related. Authorities tell us 27% of total greenhouse gas emissions in the United States come from transportation. Reducing travel, even on an individual or project basis, can make an overall difference if an agency decides to be a leader and not avoid impacts.

The DSEIR shows a table where mobile sources from the project will increase greenhouse gases by 117 metric tons per year. While not a trigger under the SCAQMD threshold, the project compels serious consideration of mitigation to reduce the potential greenhouse gas from the projects especially when such action may involve minimal change by the agency.

89-27
cont.

Since public transport is not a viable trip reducer and Uber/Lyft will likely produce equivalent or greater emissions due to idle time for pickups/drop-offs, greenhouse gas emissions for private vehicle travel, merit serious consideration for effective mitigation. The most effective mitigation would be event reduction and lower limits on attendance creating fewer vehicle trips or no change in operating conditions.

3.10.3 The Proposed Project would comply with all applicable City codes and regulations pertaining to emergency response and evacuation plans maintained by the police and fire departments in the City of Beverly Hills.

The DPR's statement of value reads in part: "We are dedicated to enhancing the health and wellness of the communities and people we serve." We can reasonably infer that DPR desires to offer safe and welcoming facilities to the public at the GARDENS. Unfortunately, the GARDENS offers unique challenges in that regard that compel more regard to safety and less regard to increasing attendance and holding more special events.

The safety issues compound due to the fact that Beverly Hills Fire Department vehicles, fire trucks, ambulances, rescue vehicles, do not have complete access to the GARDENS' property. First responders can access a large area of the property only on foot. A building overhang on the property blocks access to the property to rescue and emergency vehicles. The DSEIR fails to discuss this important concern.

Note, the six-acre property is undulated and some areas have limited, uneven pathways compounding an emergency response. This limitation has the potential to delay a critical rescue as well as delay transport to hospital facilities especially when rescue personnel have access limitations.

89-28

The fire risk at the GARDENS presents another unique concern. According to the County staff a pressurized fire hydrant exists in the front of the GARDENS' grounds. The City Fire Marshall, however, failed to indicate knowledge of this hydrant. In the event of a serious fire, however, additional fire hydrants in any event may be needed. Any backup hydrant would need to extend considerable distances, possibly even from Carolyn Way, Cove Way, and/or Crescent Drive. The nearest offsite fire hydrant appears to be at 1017 Crescent Drive, a considerable distance from the entrance to the GARDENS. This fact will again complicate and delay any response to a fire emergency at the GARDENS, perhaps even threaten historic features of the property and nearby residences.

Any concern for the safety of visitors and staff compels rules and operational procedures which account for the safety limitations of the property. The DSEIR fails to address this critical concern.

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cont.

3.11.3. *Project would not result in a substantial water demand ...*

The Garden remains one of the City of Beverly Hill's largest water users. While a limited number of the plantings are drought tolerant and the front lawn has a chemical enhancer to prolong moisture retention, the original aim and main feature of the Gardens was to import and plant trees and vegetation from regions other than Southern California. That intent continues today. Even if the former front lawn area requires less water, the large lawn by the pool, known as the Mall, does not. As a result, in total, the GARDENS cannot be considered drought tolerant.

An increase in daily attendance, increased days and hours of operation, as well as a six-fold increase in special events will trigger an increased water demand that the draft SEIR must discuss. The Special Events have the potential to add 24,000 water users to the property over the year. Restaurants are known high users of water. Using the GARDENS as a restaurant, as a venue for weddings and private birthdays parties materially equates to a larger consumption of water during mandated restrictions on water use.

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More importantly, both the Governor of California and the Metropolitan Water Department have issued drought warnings and calls to reduce water use significantly. The Governor has requested a 15% reduction from 2020 usage levels. The draft SEIR fails to state how the County will meet these conservation goals for the GARDENS.

What if these restrictions or more stringent ones become mandatory? This possibility should be discussed as well. Note, the GARDENS' source of water is from the City of Beverly Hills. City ordinances allow the City to fine users for excess water use and limit or allocate water to users. None of these concerns trigger any DSEIR discussion.

3.12.1 *In addition to the County of Los Angeles (Lead Agency), no other agency approvals are required; however, as a courtesy to the City of Beverly Hills, input from the City will continue to be sought. As a good neighbor, the Department of Parks and Recreation aims to comply with the City's regulations. Impacts to land use and planning would be less than significant.*

Interestingly, the DSEIR goes to great length to discuss how the GARDENS has a residential character when any resident in the neighborhood seeking to turn their estate into a fund-raising venue for up to 1000 guests 24 times/year and as many as 4 times/month would need a variety of Beverly Hills special event permits. This DSEIR speaks only of the County's "aim to comply with the City's regulations." We interpret this double speak as an intent to ignore City permit requirements especially if inconvenient to the DPR's goals.

89-30

Note, a special event at a residential home down the street or around the block of the GARDENS would potentially require the following city permits:

- Building or tent permit for any temporary structures.
- Valet permit

- A Charitable Solicitations Permit (after all the DSEIR says all special events are fund raisers for the GARDENS)
- A Public Assembly Permit

If the County feels they are like the other residents in the area and a “good neighbor,” the County should comport with Beverly Hills ordinances and not just “aim” to comply. Does aiming to comply mean that the GARDENS will not seek valet permits? The Friends will not seek a Charitable Solicitations Permit? The DSEIR does not provide any clarification. The reasoning for these permit requirements represents public safety and public welfare rationales. No reason should exist to object to these compliance measures.

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cont.

Yet, the DSEIR refuses to stipulate to secure these authorizations demonstrating an apparent disregard for the public safety and welfare. If nothing else, the event sponsor should have the obligation to secure such permits and the County should so advise that person or entity. Any unlicensed valet who parks cars on the city streets will very likely be cited. The County cannot bestow its sovereign immunity on an independent contractor hired by a third party.

3.12.1 *Although the GARDENS is available to be rented for commercial purposes, the rental process is not unique to the GARDENS, as public facilities in the City and County are available for private rental.*

This correspondence commenced with a researched articulation as to why a county purchased property must legally be treated differently and more circumspectly from County property received via a bequest and gift. The legal advice of this section of the DSEIR is faulty or at a minimum subject to legitimate legal challenge.

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Fundraising aside, this language admits that the GARDENS will be used for commercial purposes which are certainly without any authority in the Bequest.

3.12.1 *The proposed increase in the number of special events would improve the fundraising that supports the educational programs and maintenance of the GARDENS. Private event rental is a vital means for raising funds to sustain the operations of facilities like the Virginia Robinson GARDENS and lessens the tax-payer burden.*

Non-profit funding of public functions, like parks and gardens, does not always equate to a panacea.

An overview of the Friends fundraisings creates a different picture than the one suggested in the DSEIR. *CharityNavigator.com*, using IRS tax filing information, shows the Friends of Virginia Robinson GARDENS in 2019, the year before Covid, spent nearly 40% of funds raised on administrative and fundraising expenses. By comparison, the Friends of the Los Angeles County Library that same year spent less than 20% on administrative and fundraising expenses. The Friends of the Los Angeles Arboretum, spent approximately 15% on administrative and fundraising expenses in 2019.

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Will more fundraising by the Friends result in more fund raising or in more administrative expenses? The baseline indicates that forty out of every hundred dollars raised by the Friends does not benefit the GARDENS or the public. The DSEIR fails completely to discuss this issue.

The following negative attributes of non-public funding have been documented in a study cited below:

- Philanthropy can lead to idiosyncratic choices in what gets funded and inequities across a park system. Large gifts are often targeted to specific investments which may or may not be the highest need.
- Non-profits often have to spend money, sometimes large sums, to make money. For a group of 16 major organizations, one study found that an average of 18 percent⁶ of expenditures, as reported on the IRS 990 forms, went to non-program-related activities such as fundraising. Here, we know the Friends spend more than double than the study sample.
- Uncertainty in the year-to-year funding stream: donations are inherently uncertain, which makes it difficult to rely on them for ongoing operational expenses.

See, *Private Funding of Public Parks Assessing the Role of Philanthropy* by Margaret Walls, January, 2014.

https://recpro.memberclicks.net/assets/Library/Parks/private_funding_for_public_parks_jan2014.pdf

The author of the above-mentioned study concludes as follows:

Most communities should beware of an overreliance on philanthropy, whether through direct contributions or via conservancies and park nonprofits. Voluntary donations are unlikely to provide enough financial resources to solve the problems that exist in many park systems.

Although conservancies and park advocacy organizations serve a useful role in some communities, they are not essential to having good parks, and many communities do well without them. **Communities that are contemplating a greater role for private funding should consider bypassing these intermediaries in favor of direct donations, possibly through endowment, or trust funds.** (Emphasis added.)

The DSEIR seems lost in a conclusion it wants to reach without doing a careful analysis or a transparent discussion of the disadvantages of the policy it pursues.

3.12.2 Renting for private events is a normal operation and legal under the 501(c)(3) charitable tax designation.

Using the IRS rules for non-profits to justify the six-fold expansion of “special events” is not factual and certainly does not override that previous analysis that the Bequest controls. The Bequest does not call for the renting of the GARDENS for private events. Rather, the Bequest speaks to a public use of the property as a botanic garden and arboretum – not a rental venue.

⁶ As noted, the Friends’ administrative costs are twice the average noted in the study.

The implication of this tax reference suggests the Friends will rent out the property for special events hosted by others. After all, Governmental units, such as states and their political subdivisions, are not generally subject to federal income tax. Why even mention 501(c)(3) tax designation? Is the County entering into a new agreement with the Friends to manage the GARDENS? The DSEIR fails to so state and or even minimally analyze. This role exchange is not part of the publicly stated operational changes and creates a host of new concerns.

The IRS code, in particular the regulations governing non-profits, may not countenance the rental by the Friends of the GARDENS to third parties. Consider the following complications to the tax rules for non-profits which may disqualify the tax-exempt status of an organization like the Friends or may impose an income tax burden on the rental fees charged for a wedding or the like.

- The rent charged also includes substantial additional services being provided to the people or organization renting the property that are not customarily provided in a rental situation. Here, the GARDENS will provide decent services, some catering equipment, and for many events the GARDENS will provide preferred vendors or security.
- Public charities cannot simply re-characterize the rental payments as donations from the people or organization paying the rent. This may seem obvious, but it happens and is an issue that needs to be addressed when public charities are involved in charging rent or any other income that is not specifically a donation. Rent is rent.
- Often, Special Events hosted by the Friends, commercial sale of goods and services takes place. This may disqualify the tax-exempt status of the organization and may violate newly enacted state rules on charitable solicitations.

The DSEIR identifies again another undefined conclusion without a full and transparent analysis.

3.14.5 ...the three Special Use Event scenarios analyzed in Table 3.14-8 (no amplified music and crowd noise, moderate intensity amplified music [acoustical instruments with pickup amplifies], and high intensity amplified music [electrified, high energy, and fast tempo]), are currently allowed and occur at the Project Site under current conditions.

The operational changes, however, allow 4 special events in a single month and 24 events per year. This change is significantly different from current conditions. Multiple exposure to increased sound can well have a human health toll.

Scientific studies even suggest an under-evaluation of the hearing loss impact of exposure to noise:

The impact of hearing loss might be underestimated as recent studies have shown evidence for hidden hearing loss and synaptopathy-induced poor speech recognition. - Journal of Otolaryngology May, 2017

Whatever impacts the DSEIR states, noise from the proposed special events may, indeed, be exacting a greater human toll, especially on the neighborhood.

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3.5.12 *The main source of noise at Special Use Events would be produced from amplified sound systems*

Computer models reflect the input data. An erroneous assumption exists with the noise modeling undertaken by the DSEIR. The noise model assumes the amplified sound system will be directly adjacent to the main house. In fact, photos of past events show the source of musical entertainment (the sound source), at least for some events, in front of the pool pavilion, not adjacent to the home. Amplified sound has, in the past, also emanated from the tennis court, a location very close to the aviary filled with captive birds. Critically, the noise analysis is definitely incomplete without modeling the other potential sites on the property for amplified sound.

Additionally, and significantly, the DSEIR did no sound computer modeling from the tennis court or the Rose Garden. Both of these areas are directly adjacent to residents' homes.

The goal of an impact analysis is to present sound level data in a way that is meaningful and allows the reader and the lead agency to protect the acoustic environment. This goal should be achieved by considering sound level measurements in terms of "functional effects," the behavioral, physiological, and ecological consequences of noise. Some examples of functional effects are:

- Audibility (can you hear the sound or not?)
- Speech interference (is the noise loud enough to interfere with communication?)
- Sleep interruption (is the noise loud enough to wake someone up in the middle of the night?)
- Reduction in listening area for humans (is the intensity and duration of the sound loud enough to mask important auditory cues?)

If noise source is so loud it wakes you up in the middle of the night, it has an impact. If noise interferes with a person's ability to have a conversation or to engage in routine normal activities, it also has an impact. The precise decibel measurement may not be as important as the functional impact.

Even so, the modeling still raises significant decibel numbers. The noise generated from amplified sound sourced from next to the house in the GARDENS will generate high 60 dBA to 70 dBA⁷ at some homes on multiple occasions, which the modeling does not quantify in functional terms. The results presented are both incomplete and yet very troubling at the same time.

Ironically, the Los County Code of Ordinances states: "It shall be the policy of the county to maintain quiet in those areas which exhibit low noise levels and to implement programs aimed

⁷ The DSEIR equates 70 dBA to the equivalent of truck noise. By inference the study indicates neighborhood residences will encounter continuous truck noise for hours during a special event.

at reducing noise in those areas within the county where noise levels are above acceptable values.” Sec. 12.08.020(A). Apparently, that goal does not apply to operations at the GARDENS.

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3.14.6 Property owners and occupants located within 500 feet of the Virginia Robinson GARDENS boundary shall be sent a notice, at least five (5) days prior to commencement of all Special Use Events employing the use of amplified sound.

As mitigation the DSEIR proposes that residents get a notice potentially up to 24 times a year that noise levels from special events at the GARDENS may be so loud that they will need to abandon their property! This is hardly mitigation – more of a constructive eviction. The fact that this notice will be sent just reinforces an admission that the 24 special events at the GARDENS will be creating nuisance conditions affecting scores of residents in the neighborhood. How ironic that on page 3-27 of the DSEIR, the document indicates that County desires to be a “good neighbor.”

Being a good neighbor according to the DSEIR means the neighbors of the GARDENS must leave their homes because the Friends or the County have rented the GARDENS contrary to the Bequest, which intended the GARDENS to be a valuable asset to the neighborhood, to an event which will play extreme loud, amplified music and invite scores of guests to a private event. The County has no legal right to create knowingly a noise nuisance.

The proposed noise mitigation provides more meaningless mitigation to the amplified sound issue:

The sound amplification system accommodating Special Use Events with amplified music shall include a processor to control the maximum output of the speakers ...

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Significantly, no enforcement mechanism for this mitigation is proposed. Will the Beverly Hills police be able to check the amplification system for this “control?” Who is to say the band will not turn-off the processor? Why is the control set at 80 dBA? 60 dBA is a much more effective mitigation.

Of course, the appropriate and proper mitigation would be to prohibit moderate and high intensity amplified music completely at the GARDENS. The GARDENS is not the Hollywood Bowl. Such ineffective mitigation underscores the desire of the County and the Friends to do as they please -- not to do what is right, not to act how a “good neighbor” would.

3.15.3 Similarly, the number of attendees at Special Use Events would increase above the approximately 1,400 that currently occurs annually (4 events of approximately 350 guests each), and the number of Special Use Events would increase on site from 4 to 24 annually under the Proposed Project,

The proposed operational changes for the GARDENS present no limits on special event attendance. 350 guests is not specified as an operational condition. Rather the number represents an attendance number from a past event. A better guide for the maximum attendance at a GARDENS “special event” would be to look at a web page on the GARDENS website (removed at the time of the start of the environmental review process). That web page

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indicates a potential attendance of over 850 possible attendees plus event support staff, usually 10-20% of attendance, or a total of 1000 persons.

Here is the breakdown of the capacity the GARDENS has suggested for a private event:

Area of GARDENS	Suggested Capacity
Pool Pavilion	50
Rose Garden	60
Great Lawn	300
Great Terrazzo Patio	75
Tennis Court	300
Poolside	80 (40/side)

89-37
cont.

24 special events per year may well equal to 1000 persons or more, 500 cars or more plus service trucks, visiting the GARDENS/special event. This number is the proper capacity to analyze for capacity as Section 21151(b)(2)(B) of CEQA states:

When a lead agency prepares a master environmental impact report, the document shall include all of the following: ... The **maximum** and minimum intensity of any anticipated subsequent project ... (Emphasis added.)

The fact that the GARDENS in the past may have sold only 350 tickets to a fundraising event does not set the upper limit for any current review analysis. Since the GARDENS propose no operational condition which would regulate attendance numbers for a wedding, private event, of Friends' events, the referenced capacity numbers above properly serve as the "maximum." More worrisome is the notion is that these "maximum" capacity numbers might even increase in actual implementation.

In short, the DSEIR fails to detail the potential attendance increases and analyze their impacts. This failure is a legally significant factor as noted previously.

3.16.3. *Additionally, the number of Special Use Events on the Project Site would increase from 4 to 24 annually; however, the number of allowed attendees per event would not increase from current attendees at Special Use Events.*

The proposed project states the following types of events: "... propose adding private and family ceremonies such as weddings." No limit on attendees is stated. Later in special uses, which historically have represented fundraising events sponsored by the Friends, the proposed project states: "...tickets would continue to be sold to regulate the number of visitors to ensure safety and a quality experience." Again, this statement is a no cap or any limit the GARDENS decide depending on how one wants to define the verbiage. The initial 1980 operating rules provide a guide as to how large the fundraising events might represent as it notes that the Garden Tour could include up to 675 guests.

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3.16.1 *The Beverly Hills Fire Department (BHFD) provides fire and emergency services within the City of Beverly Hills.*

Previously, we discussed the inherent physical challenges the GARDENS presents to Beverly Hills emergency responders. Again, these limitations represent another significant impact which the DSEIR does not mention although it was raised during the scoping process.

Appropriate mitigation should, but the DSEIR does not, include:

- Conspicuous notice on the GARDENS' website and onsite notice that response to any personal health emergency may be delayed due to restricted access of emergency vehicles to the GARDENS' property;
- Training of all County employees in first aid and CPR;
- Installation of defibrillator(s) on garden property and employee training on its use.
- A reduction in current onsite attendance limits and not an increase in limits; and
- A reduction in the number of special events.

The safety of visitors to County facilities should be a paramount concern. The DSEIR does not even discuss this crucial safety concern.

3.17.1 *The GARDENS provides extensive educational programs for Title I schools and students; an outdoor classroom for hosting lectures on climate appropriate plants, green waste issues, and gardening techniques for the local residents; and a venue for historical lectures and book clubs. Furthermore, the GARDENS provides a park space for family events such as birthdays and special occasions.*

The DSEIR provides no support for the conclusions the "GARDENS provides extensive educational programs for Title I schools and students." From every appearance, such programs represent one of the smallest efforts of the GARDENS. At one time the GARDENS' website indicated such programs constitute 5% of programming. A review of past activities of the GARDENS as documented online in the archives of its website depict no glowing reports or multitude of photographs for the Title I program as compared to the Friends' book club events or the rose sale.

One can discern the minimal nature of the program by the following description the website provides about the program: "We are able to accommodate up to 42 students with 4 adult chaperones. Tours are offered Monday through Friday from 10:00AM to 12:30PM with an advanced reservation."

To be clear, the neighbors support the school education program; we have no issue with this objective. This educational objective, however, does not require the extensive operational changes proposed. Note, in particular, the GARDENS' website says that the education program "is supported by grants and donations." The website provides a phone number and web page to arrange for a donation. All the extra special events, commercial activities, and increased

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attendance fees will not apparently directly benefit the educational program which has separate funding sources.

To address a second issue raised in the noted DSEIR section, the Bequest does not specify use of the property as “park” space as this language suggests. Park space is easily differentiated from a botanical garden and an arboretum. A botanical garden is a place dedicated to the growing, gathering, preservation, and exhibition of a broad range of plants often labeled with their botanical names. While a park may contain flowers and plants, a park is dedicated land for recreational purposes. The two do not serve the same purpose. We previously detailed this difference at length above in this correspondence.

The GARDENS is not a park and the suggestions in the DSEIR that the GARDENS should be managed the same way as other County parks is a disservice the Robinson Bequest and ultimately is a prescription to the diminution of the value and significance of the GARDENS.

Indeed, a fair look at reported events at the GARDENS from the GARDENS website archives suggests use of the GARDENS, not as a botanical center or an arboretum, but rather as use as private club. Note some of the subjects of recent and past lectures/book clubs: *The Anglophile’s Notebook*, a biography of Fred Astaire, *The Devil in the White City: Murder, Magic and Madness at the Fair That Changed America*, Charlie Chaplin lecture, *No Place like Home: Interiors by Madeline Stewart*, *Finding the People of the Pyramids*, plus others.

Again, the DSEIR fails to present the full picture of the current and expanded use of the GARDENS to the detriment of the analysis.

3.17.3 *The Proposed Project would not result in the deterioration of the Project Site...*

Operations will increase by 52 days/year. The proposed operational changes will allow 200 visitors every day of the year; and 24 event where maximum capacity might equate to 1000/persons/event or more. This means a total of potential visitors to the facility of a yearly basis of nearly 100,000.

Where will these visitors park? The DSEIR says that the GARDENS has onsite parking for 35 vehicles, more likely onsite parking is 20 to 25. The implication is that the excess parking, which will considerable, will impact neighborhood streets.

The GARDENS represents a legacy of an estate garden. The Robinsons’ Garden was never intended to support 100,000 or more visitors per year. The layout of the GARDENS does not reflect a high-volume design to accommodate 100,000 visitors. Indeed, the DSEIR suggests the current number of visitors averages about 20/day, which likely reflects the visitor traffic contemplated by the Robinsons as they developed their garden.

100,000 visitors will no doubt challenge maintenance and upkeep of the Garden. Significantly, the more a botanical garden is seen as a visitor attraction rather than a custodian of the world’s plants, the botanical garden’s vital purpose is lost. The real goal should be that every visitor who comes to the GARDENS walks away with a greater appreciation of the environment. That appreciation will be lost with these operational changes. The goal of the proposed changes

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reflects pure numbers, visitor attendance -- not plant preservation, not enhancement of environmental awareness.

When the DSEIR concludes in 3.17.5 that “a beneficial impact would occur,” it speaks only to attendance numbers and not to botanical preservation or a quality visitor experience.

3.18.6 *The Proposed Project’s impact to local roadways (Elden Way) would be **significant and unavoidable**.* (Emphasis added.)

The traffic and parking issue is even more significant and unavoidable than this single sentence reveals for the following reasons:

- The traffic analysis did not include an analysis of the 24 special events.
- The environmental analysis in 2014 found the impact to local roadways significant and unavoidable. Meaning the six-fold increase in special events, the double of daily attendance limits implies that the traffic impact is even more significant than the previous analysis.
- The analysis does not discuss the impact to Cove Way. County staff use Cove Way for an “entrance” to the GARDENS to park on an unpaved area. Event trucks and event staffers commonly use Cove Way as their “parking lot.” Yet, the DSEIR fails to discuss these circumstances.
- The analysis assumes 35 parking spaces on-stie. Yet the DSEIR fails to explain by diagram or otherwise how this parking level exists. Prior documentation has photo documentation of only 20-25 spaces.
- No mention is noted of the fact that Beverly Drive North feeds into Coldwater Canyon, a major artery to the San Fernando Valley. Traffic increases on this road complicate commuter traffic and passage from the Basin to the Valley.
- The proposed mitigation of urging Uber and Lyft use does not mitigate the traffic issue. An Uber vehicle will travel the same distance and route as a private vehicle. While parking pressure may be less, the drop-off and pick-off, especially for an event or a timed entrance will create a significant and unavoidable impact on Eldon Way. The DSEIR fails to suggest a reasonable drop-off and pick-up scheme.
- The significant impact is not just on Eldon Way. Where will the cars park when the visitors learn that the GARDENS does not have parking for them? Crescent Drive? Lexington? Cove Way? Hartford? As noted previously, residents on these streets can petition for permit parking only. The document also fails to discuss that valet parking permits require City authorization.
- This correspondence offers numerous prior comments on traffic and parking. Those comments apply to this section as well.

We know the County proposes to add 100,000 visitors annually, but no accounting for street parking restrictions, no Uber/Lyft drop-off/pick-up staging area, no defined offsite parking, no meaningful mass transit (bus) service, and no guaranteed permitted valet parking. The logical conclusion is that the project fails unless drastically reduced in scope.

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A public agency may approve a project even though the project would cause a significant effect on the environment if the agency makes a fully informed and publicly disclosed decision that: (a) There is no feasible way to lessen or avoid the significant effect (see Section 15091); and (b) Specifically identified expected benefits from the project outweigh the policy of reducing or avoiding significant environmental impacts of the project. (Emphasis added.)

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As you will see below, the no project alternative presents a feasible way to lesson or avoid the significant impact of 100,000 potential additional round-trips to the Gardens and provide the benefits that the County seeks.

3.18.1 *According to the City's 2020 Urban Water Management Plan (UWMP), the City anticipates being able to meet water demand with adequate supplies through the year 2045 under normal, dry, and multiple dry year conditions (City of Beverly Hills 2020).*

The referenced UWMP was prepared prior to the current drought. Thus, the plan does not take into account the fact that the Lake Mead is at historic low levels and headed to possible dead pool status or that the California state water system has reduced allocations to the Metropolitan Water district to 5% of normal or less. The Governor has called for 15% reduction in water usage. The City of Beverly Hills recently restricted irrigation watering to two days/week. Further restrictions could take place in September. The DSEIR ignores all current conditions which appear to be the norm, not an aberration. What if the GARDENS must only water one day/week due to the drought? How can it sustain increased visitor and special event usage?

89-43

All these points escape discussion in DSEIR. Nor does the DESIR mention that the city according to its Integrated Water Resources Master Plan has less than a ½ day of emergency water at low storage capacity in the event of a wildfire, earthquake or catastrophic emergency. Such diminished water supply could imperil the structures at the GARDENS and threaten the GARDENS botanic nature.

Yet, given the existing threat to Southern California water resources, the DSEIR proposes not a single mitigation beyond the existing irrigation in place. No reduction in watering days? No commitment to comply with Beverly Hills water ordinances.

3.21.1 *There has not been a wildland fire of any significance in Beverly Hills, and the last large wildland fire adjacent to the City occurred in Franklin Canyon more than 50 years ago.*

Wildfires are happening in the area all the time. Only good fortunate (no adverse weather conditions) and skilled firefighting has prevented any catastrophe. That may not be the case next time.

On Monday, August 15, 2022, a quarter acre fire started at 2040 N Beverly Dr. (approximately one mile from the GARDENS) and grew to around one acre. The fire was in medium to heavy brush and was burning uphill. Some 85 Los Angeles County firefighters responded to the brush fire by ground and air with the help of the Beverly Hills and Los Angeles County fire departments. Again, fortunately the fire was contained 90 minutes after it started.

A quarter acre brush fire occurred on April 22, 2022 at 9505 W. Hidden Valley Road, near Coldwater Canyon Drive and Franklin Canyon Park. The fire was extinguished in 45 minutes.

Notably, the DSEIR also fails to discuss the Bel-air Fire of 1961. A community just a few miles west of Beverly Hills. The Bel Air Fire was a disaster that began as a construction debris fire on November 6, 1961, in the Bel Air community of Los Angeles. The fire destroyed 484 homes and burned 6,090 acres. At least 200 Firemen were injured, with mostly eye injuries due to the smoke and flying embers. The fire was fueled by strong Santa Ana winds.

A few miles west of Bel Air, a more recent fire in 2019, the Getty Fire burned 745 acres in Los Angeles. Thousands of people were forced to flee, 10 homes were destroyed and 15 residences were damaged.

Wildfire is a real hazard for Beverly Hills. Factually, the DSEIR should prominently state that the GARDENS resides in a Wildfire Designated Hazard Area. This designation alone creates a significant impact and demands inclusion of the following mitigation: Garden closure on any declared red flag day for the Beverly Hills area.

ALTERNATIVES

- 4.1 *The Proposed Project is a minor modification to [the 1980 Operating Agreement with the Friends].*

The modifications of the Proposed Project are material, impactful and under-analyzed. The Proposed project creates material changes which are not discussed fully in this DSEIR.

The recitals to the Operating Agreement state that the County and Friends “desire to cooperate in providing funding and programs for the benefit of the public.” Yet, many of the significant operational changes call for private and commercial events. The DSEIR does not make clear how the County can separate funding from the Friends for just public purposes from their private uses. More importantly, many of the changes will violate the Bequest unless the events relate to using the GARDENS as a botanical facility or an arboretum, which on their face, the changes do not.

In effect, the proposed changes turn the Friends into the operator or at least co-operator of the GARDENS which is materially beyond the scope of the original operating understanding and beyond the scope of the Bequest. This fact is also not mentioned in the project description. The Robinson Bequest contemplated the GARDENS being operated by either Los Angeles County or by the City of Beverly Hills – not in whole or in part by a private group, non-profit or otherwise. Again, the County’s authority to enter the Operating Agreement may be valid for property it acquired by purchase but not by the terms of the Robinson Bequest.

- 4.1 *CEQA Guidelines require that an EIR identify the environmentally superior alternative. The No Project Alternative would be the environmentally superior alternative because it would avoid all impacts associated with the Proposed Project. However, the No Project Alternative would not meet any of the project objectives. . .*

89-43
cont.

89-44

89-45

THE NO PROJECT ALTERNATIVE WILL ELIMINATE ALL THE ENVIRONMENTAL IMPACTS DESCRIBED IN THE DSEIR AND YET STILL FULLY SUPPORT THE COUNTY POLICY OBJECTIVES.

In analyzing the proposed operational changes on their face and even when comparing the proposed operational changes to the operational changes of the Final Supplemental Environmental Impact Report for the Proposed Operational Changes to Virginia Robinson Gardens dated May, 2014, one must ask what happened to a balancing of interests? What happened to common sense? Plain, non-impactful solutions exist to support the County's objectives.

Indeed, CEQA recognizes that in determining whether and how a project should be approved, a public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social factors and in particular the goal of providing a decent home and satisfying living environment for every Californian. See, CEQA Regulation 15021(d).

The No Project Alternative is compelling in terms of meeting the policy objectives of the County; yet the DSEIR dismisses it with a dearth of discussion even though the DSEIR acknowledges it fully mitigates all impacts.

Proposed Days of Operation: Every Sunday

Opening every Sunday will pose logistical and staffing issues. The current Sunday closing represents a responsible way to manage operations at the GARDENS.

With twenty-four potential events, most likely to take place on the weekends, nearly half of the Sundays a year will be unwelcome opportunities for guests to view the Gardens due to the event tables, porta-johns, chairs, and debris remaining. Where will the GARDENS find volunteers to give tours every Sunday, an essential feature of a visit to the GARDENS?

Operating Hours: Open Daily to Sunset

Daily sunset closing hours do not offer a unique experience. Visitors come for experience in daylight, not at dusk. The current hours support that preferred experience.

Increasing Attendance

Instead of multiplying special events and arbitrarily doubling attendance limits, what about just letting the public know of the GARDENS in an interesting and compelling webpage and marketing effort? The GARDENS should sell itself if properly presented. Excess attendance capacity exists under existing limits.

How much greater attendance or access does the 365/7 days-a-week provide? Perhaps none. If the County's goal is increased attendance and access, why not look at how the GARDENS is marketed? The GARDENS' webpage, *RobinsonGardens.org*, reads like a Facebook page for a private organization with long written accounts and pictures of book club meetings or gingerbread house decorating sessions dominating the information.

89-45
cont.

If a restaurant only fills 20% of its seating daily, what management decides to double the number of chairs and tables as a solution to lagging business? The same applies to the GARDENS.

Traffic and Parking

The current attendance limit offers the correct balance between what the Gardens can support in terms of parking and what street parking can tolerate on a daily basis. Upsetting that balance will only create a negative visitor experience at the Gardens.

Inclusivity and Equity

If County wants to allow wedding parties to take photos with the botanical garden as a background, do so by reservation, without creating a commercial catering venue. B

Basic program changes can enhance equity and inclusivity without operational changes – the Gardens has demonstrated so as previously noted in this communication

Some public GARDENS in Southern California operate on a no wedding reception basis, especially those of a similar size to the GARDENS. See, our correspondence on scoping. Such a restriction would certainly open up the GARDENS publicly more than a 24 private, expensive, catered affairs would.

Educational Center

The Title I education program and even an after-school program can be expanded within current hours of operation.

The GARDENS' website notes that the GARDENS only currently conducts the educational program from 10 AM to 12:30 PM for 42 students. Why not extend the hours for the program to 2:30 PM?

Special Events

Previous operation changes required that special uses were linked to a “focus on the historical interpretation of the facility, the GARDENS and the home.” What happened to that limitation? What is wrong with the same connection for any future special events?

Alternative, less intrusive and effective, fundraising options are available without the necessity of operational changes.

Currently, the GARDENS may have 4 special events per year. These have traditionally included a Patron Party (fundraiser), and Garden Tours for two consecutive days⁸ (fundraiser). These events have been held pursuant to advance ticket sale to regulate the number of visitors to “assure safety and a quality experience.”⁹

⁸ The Garden Tour started as one day, changed to two days, and current has reverted to a one-day event.

⁹ The limit on ticket sales to assure a safe and quality experience may reflect the fact that many of the Friends' larger fundraising events include garden tours of private homes which have a limited capacity rather than an altruistic effort to enhance the experience at the Gardens.

89-45
cont.

Direct mail campaign, online donations, phone solicitations, email-marketing, crowdfunding and offsite fundraising events represent effective charity fundraising approaches. Why not hold fund raising dinners at private restaurants in the Beverly Hills business district instead of burdening the GARDENS with hundreds of guests or overwhelming the neighborhood and the city with noise, and traffic? An opera or theatrical performance would be better enjoyed and attended, raising more money, at a theater like the Wallis than at the GARDENS? Other charities operate in this manner.

89-45
cont.

The DPR overreaches with these operating changes. Common sense tells us so. The plain fact is the current limits are more than adequate and balanced. At best, minor program adjustments are required and more responsible fundraising and operations are required.

4.2 *Per CEQA Guidelines Section 15126.6, the discussion of alternatives must focus on alternatives capable of either avoiding or substantially lessening any significant environmental effects of the project, even if the alternative would impede, to some degree, the attainment of the project objectives or would be more costly.*

Per CEQA guidelines, project alternatives have a more expansive role than just mitigating significant impacts. Alternatives, in the context of the California Environmental Quality Act (CEQA), are optional ways that the project proponent could achieve most of their objectives, while also reducing or eliminating the environmental impacts of the proposed project (California Public Resources Code [PRC] Section 21002; see also *Friends of the Old Trees v. Department of Forestry & Fire Protection* (1997)) 52 Cal App 4th 1383.)

A host of undiscussed alternatives exist which would allow the County to reach its objectives while also reducing or eliminating the environmental impacts of the proposed project. Many such alternatives have been identified in above discussion of a No Project Alternative. Here are some other alternatives:

89-46

- Sell the property to a private developer to sub-divide the land into resident homes consistent with the existing character of the neighborhood. The proceeds could go to purchase public park land more suitable to the expressed policy goals of the DPR.
- Rescind the Bequest allowing the Property to transfer to the City of Beverly Hills which has the infrastructure to operate the GARDENS per the terms of the Bequest.
- Enter an operating agreement with the City of Beverly Hills while still retaining ownership of the GARDENS.
- Use the GARDENS solely as a Title I educational center from 9 AM to 4:30 PM during school days. The Friends would exist just to raise funds and volunteers to support this stated effort with the existing number of special events (4).
- Purchase or lease an offsite parking facility and shuttle service eliminating any need for onsite visitor parking.
- Increase the number of special events from 4 to 5. Eliminate the use of amplified sound for special or any events on the property. Require offsite parking, not street parking for attendance. Set an attendance limit of 300 for any of these special events. Raise the price of a ticket to secure fundraising targets.

- Operate the GARDENS per the original 1980 operational parameters. The initial 1980 parameters most consistently conform to the aims of the Bequest. The DPR would recognize the inherent unique characteristics of the GARDENS which these original operational terms preserve best of all the operational conditions suggested.

89-46
cont.

All of these alternatives merit analysis and discussion for the County to make a decision on a prudent course of conduct.

CUMULATIVE IMPACTS

- 5.1. *The Proposed Project would not cause a substantial increase in traffic, nor would it induce substantial population growth. Both population-based and footprint-based impacts would be less than significant.*

The “elephant” in the DSEIR can best be described by looking at the overall impact of the Proposed Project against the current use. Currently, the DSEIR says the GARDENS averages 20 visitors/day on its six days/week operations or a yearly total of 6240 visitors. The DSEIR does not explain whether Covid has affected attendance or whether the seasons affect attendance -- higher in spring/summer.

The Proposed project equates to 200 visitors per day, 365 days a year plus 24 events with a potential of 1000 guests or more per event or a yearly total of approximately 100,000 visitors a year. The ultimate impact is the effect of a total of 6000 visitors increasing to nearly 100,000 visitors with a purported 35 onsite parking spaces.

What is the cumulative impact of a special event at the GARDENS with maximum capacity of 1000 visitors with the nearby Beverly Hills Hotel? Assume it is Christmas or June wedding time, the Beverly Hills Hotel (“Hotel”) is at maximum capacity for occupancy and events. Here is what the Hotel adds per: 850 guest rooms x 2 persons per room; the Rodeo Ballroom, maximum capacity 600; the Crystal Ballroom, max capacity 850; the Sunset Ballroom, maximum capacity 220; Polo Lounge private room, 100; and the Boardroom, maximum of 12 for a potential of 3482 visitors. This number does not include hotel staff. Assuming all these events arrive within four- hour period and 2/persons per vehicle, a cumulative total of vehicles in the area of Crescent between Sunset and Lexington could approximate 2200 vehicles not including delivery and other support vehicles. The DSEIR does not discuss this cumulative impact.

89-47
cont.

Another ignored cumulative impact would involve events not just at the Beverly Hills Hotel, but at other nearby event locations such as the Beverly Hills Women’s Club, capacity 150, and Greystone Manor, capacity 300.

Since the neighborhood includes many large estates, what if four other events are hosted at the same time along with those noted. Consider Pickfair Estate, an 18- acre estate within a ½ mile distance or less from the GARDENS. Grayhall Estate on Carolyn Way is even closer to the Gardens. The DSEIR notes a 15,000 square foot estate proposed at 1510 Lexington, walking distance to the GARDENS. A mansion with its own ballroom was recently completed on the corner of Lexington and Hartford. Again, no discussion of these potential cumulative events.

Cumulative impacts look at the big picture. The DSEIR took a myopic approach to look only at the Gardens and a few select homes in the vicinity.

89-47
cont.

CONCLUSION

We do not expect a perfect environmental analysis. Unfortunately, as we read the entire document, we noted the following: critical deficiencies and omissions, an incomplete analysis and an analysis that fits the intended result rather than a fair and complete look at the consequences of the proposed operational changes. We ask that you give careful consideration to our comments and advise the Board of Supervisors of our concerns.

89-48

Sincerely,

Charles Alpert
1035 Carolyn Way
calpert@hotmail.com

Don and Jodi Stine
1024 Cove Way

Lili Bosse
Neighbor

Kathy and Al Checchi
1007 Cove Way

Dar Mahboubi
Edna Mahboubi
Jonathan Mahboubi
Rebecca Mahboubi
Neighbors

Arnold and Sharon Messer
1020 Cove Way

Vera and Paul Guerin
1014 N. Crescent Drive

Roxanne Heptner
1031 Cove Way

Responses to Letter 89 – Charles Alpert

Response to Comment 89-1:

This comment provides an overview of the comments contained in this comment letter. These comments are noted. No further response is required. The commenter is referred to the responses to comments below.

Response to Comment 89-2:

This comment is regarding the Grant Deed for the Virginia Robinson Gardens. This comment quotes the Deed which per this comment states that the property "...shall be held and used by [the County] perpetually for the purpose of an arboretum or botanic garden and for no other purpose inconsistent with said use." This comment is noted.

The comment goes on to state that the County cannot use the Project Site as a park. It should be noted that the Draft SEIR does not describe the site as a "public park." This comment cites the legal case *Archer v. Salinas City*, (1982) 93 Cal. 43, 51. which states that the dedicated property is "impressed with the use for which it was intended." This comment is noted. Please refer to Master Response 8.

Response to Comment 89-3:

This comment cites several legal decisions regarding donation of land and restrictions upon the donated land. The court cases cited include: *Spinks v. City of Los Angeles*, 220 Cal. 366, 368; *City and County of S.F. v. Linares*, 16 Cal. 2d 441, 446; *Big Sur Properties v. Mott* (1976) 62 Cal App 3rd 99; *Roberts v. City of Palos Verdes Estates*, (1949) 93 Cal. App. 2d 545, 547; *Griffith v. Department of Public Works*, (1956) 141 Cal. App. 2d 376, 380; *Slavich v. Hamilton*, (1927) 201 Cal. 299, 303 [257 P. 60]; *Spires v. City of Los Angeles*, (1906) 150 Cal 64; *Tiburon Open Space Committee v. Marin County*, (May 12, 2022, A159860)_Cal.Rptr.3d_2022WL 198892; *Slavich v. Hamilton*, supra; and *Save Mile Square Com v. County of Orange*, (2001) 92 Cal App 4th 1142. This comment is noted. Please refer to Master Response 8.

Response to Comment 89-4:

This comment is regarding the nature of special events. The commenter states that the Special Events need to comport with the parameters of the Gift (i.e., the Grand Deed) and that the County's proposed operational uses do not comport (i.e., agree with) with the Robinson Bequest, which according to what the commenter states in Comment 89-2, is that the property "...shall be held and used by [the County] perpetually for the purpose of an arboretum or botanic garden and for no other purpose inconsistent with said use."

Per page 1-2 of the SEIR for the Proposed Project, there is a limit of four Special Use Events per year as identified in the 2014 SEIR. These Special Use Events are limited in the number of attendees." As detailed on page 20 of the Final Supplemental EIR, dated July 2014 (Volume 1), the types of themes proposed during special events in the 2014 SEIR are all consistent with the goals of the Virginia Robinson Gardens to increase public access and expand the themes of biology, botany and horticulture. This comment is noted. Please refer to Master Response 8.

Response to Comment 89-5:

This comment is regards to the superintendent and the approval of events at the Project Site. The comment also states that the County of Los Angeles Department of Parks and Recreation has failed to provide the public with an accurate, stable, and finite project description. Please refer to Response to Comment 82-1. This comment mentions the *Stopthemillenniumhollywood.com et al. v. City of Los Angeles et al.* court case.

The comment provides a table that the commenter states shows the deviation from the scope of operational changes provided in the November 2021 Notice of Preparation and the project description in the July 2022 Draft SEIR for the Proposed Project. Please refer to Response to Comment 82-1.

This comment states that the initial notice did not define “existing events” and that the Draft SEIR provides a “litany of additional uses.” Please refer to Response to Comment 82-1.

Another comment provides what the commenter asserts are examples of a lack of an accurate, stable, and finite project description in which the correspondence (interpreted to be the initial notice referenced in the paragraph above). Please refer to Response to Comment 82-1.

Response to Comment 89-6:

This comment lists the botanical facilities currently operated by the County of Los Angeles Parks and Recreation Department and goes on to list the ownership differences in the various County botanical gardens. This comment does not raise any issues regarding the content or adequacy of the environmental analysis in the Draft SEIR for the Proposed Project and does not raise a specific environmental issue. This comment is noted. No further response is required.

This comment describes the size of the County operated botanical facilities and compares them to the size of the Project Site. This comment does not raise any issues regarding the content or adequacy of the environmental analysis in the Draft SEIR for the Proposed Project and does not raise a specific environmental issue. This comment is noted. No further response is required.

The commenter refers to the parking spaces for the Proposed Project. This comment is noted.

Response to Comment 89-7:

This comment lists the ways the commenter believes that the Virginia Robinson Gardens is different from “any park.” This comment does not raise any issues regarding the content or adequacy of the environmental analysis in the Draft SEIR for the Proposed Project and does not raise a specific environmental issue. This comment is noted. No further response is required.

The commenter states that “trying to socially equalize County operations, many with different purposes and physical attributes, compared to the [Virginia Robinson] Gardens inherently creates unmitigable and significant environmental and social impacts....” This comment does not provide any specific information regarding what “unmitigable and significant environmental and social impacts” are created by the

Proposed Project. This comment makes vague claims and does not raise a specific environmental issue. This comment is noted. No further response is required.

Response to Comment 89-8:

The commenter states that the Draft SEIR does not provide a sufficient degree of analysis for “virtually all potential environmental impacts discussed.” The commenter also describes other deficiencies that are believed to be in the DSEIR, including incomplete analysis, missing information, conclusions without support, and a biased analysis. This comment is noted.

The commenter goes on to provide more specific comments regarding the Draft SEIR on a section-by-section basis. Please refer to the responses below:

Introduction

This comment states that the County does not work in partnership with the Friends of Robinson Gardens and that “an independent contract is not a ‘partner’.” This statement is a matter of opinion and does not raise a specific environmental issue. This comment is noted. No further response is required.

This comment states that the Friends of Robinson Gardens “...command the events at the GARDENS to the extent that much of the time the GARDENS becomes effectively a non-public, private organization dominating, even monopolizing, a public facility.” This comment goes on to expand upon the relationship of the Friends of Robinson Gardens to the facility and discusses the tax filings of the Friends of Robinson Gardens. This comment discusses the partnership between the facility and the Friends of Robinson Gardens. The requirements to become a member of the Friends of Robinson Gardens is not a part of the Proposed Project. In addition, the fund-raising programs that the Friends sponsor likewise are not a part of the Proposed Project and as such are not discussed in the Draft SEIR. The commenter is correct that the DSEIR “contains none of this material information” because how this entity operates is not part of the Proposed Project. These statements regarding the Friends of Robinson Gardens and how they operate do not raise a specific environmental issue regarding the changes proposed as part of the Proposed Project. This comment is noted. No further response is required.

Response to Comment 89-9:

The commenter discusses the statement in the Draft SEIR that the Virginia Robinson Gardens has been designated by the National Wildlife Federation as an official Certified Wildlife Habitat Site and states that the certification is a self-certification. The Project Site’s designation by the National Wildlife Federation as an official Certified Wildlife Habitat Site does not raise a specific environmental issue regarding the changes proposed as part of the Proposed Project. This comment is noted. No further response is required.

The commenter references the statement in the Draft SEIR that the Virginia Robinson Gardens serves as “an urban forest” and goes on to discuss the tree species and canopy. This comment also states that the Draft SEIR “offers a misleading and unsubstantiated picture of the environmental merit of the property.” However, in contrast to this last statement by the commenter, the Draft SEIR found that the Proposed

Project would have a less than significant impact to biological resources. More specifically, the potential biological impacts of the Proposed Project were analyzed in Section 3.5, Biological Resources, of the Draft SEIR. As stated on page 3-11 of the DSEIR, "The 2014 SEIR did not identify any significant project impacts on biological resources associated with the previous operational changes at the Gardens. There were no mitigation measures identified in the 2014 SEIR because the impacts were found to be less than significant." In addition, page 3-11 of the Draft SEIR states the following: "The Gardens are home to approximately 150 bird species and have been designated by the National Wildlife Federation as an official Certified Wildlife Habitat Site. However, vegetation at the Project Site consists of non-native landscape plantings that do not function as any naturally occurring plant communities or habitat types. As such, the Project Site is not considered part of any sensitive natural community. In addition, no riparian, wetland, or other sensitive habitats are located on or immediately adjacent to the Project Site." The biological resources analysis in the Draft EIR for the Proposed Project concludes that no significant impacts were identified, and therefore no mitigation measures are required.

This comment further states that: "...the DSEIR must address, but does not, the impacts this visitor increase will have on the wildlife and on the flora and fauna of the GARDENS. However, contrary to this comment, page 3-11 in Section 3.5, Biological Resources, of the Draft SEIR states the following: "As described in the 2012 Draft SEIR, no special-status plant or wildlife species are likely to occur on or in the vicinity of the Project Site due to existing anthropogenic-related disturbances and lack of suitable native habitat (County of Los Angeles 2012). Existing protocols and precautions to protect the integrity of the structures and gardens will ensure that existing vegetation remains undisturbed by the proposed increase in visitors. Common wildlife would continue to benefit from the habitat that the gardens provide, and the biological functions and values associated with the existing environment would remain unchanged. A less than significant impact would occur." Therefore, as detailed above, contrary to what this comment asserts, the Draft SEIR does in fact analyze the potential impacts of an increase in visitors to the Project Site.

The commenter discusses the educational programming and tours to children and the events of the Friends of Robinson Gardens and how the website for the gardens is designed and features each of these programs. This comment does not raise any issues regarding the content or adequacy of the environmental analysis in the Draft SEIR for the Proposed Project and does not raise a specific environmental issue. This comment is noted. No further response is required.

This comment is regarding the County of Los Angeles Department of Parks and Recreation stating that the County should cease its relationship with the Friends of Robinson Gardens. This comment does not raise any issues regarding the content or adequacy of the environmental analysis in the Draft SEIR for the Proposed Project and does not raise a specific environmental issue. This comment is noted. No further response is required.

The commenter describes some of the historic activities that the Friends of Robinson Gardens has hosted. This comment is noted.

The commenter states that "No justification or quantification exists in the DSEIR to establish that the proposed changes will enhance any of the goals stated by the Department of Parks and Recreation." As detailed on page 1-2 of the Draft SEIR, the current objectives of the Department of Parks and Recreation

are: “inclusivity and accessibility and adhere to DPR’s mission to serve as stewards of parklands, build healthy and resilient communities, and advance social equity and cohesion. As detailed on page 2-6 of the Draft SEIR, the Proposed Project would expand the “current operational restrictions of 6.5 hours a day, six days a week limits the Gardens ability to fulfill the mission of Virginia Robinson’s bequeathment to the County. By allowing the Gardens to welcome the public until sunset, as most other public gardens and parks do, students and the public would have greater access. The Gardens would be able to offer science and botanical education to more students from all schools, including Title I schools. Title I is a Federal Entitlement Program designed to meet the needs of children who come from low-income households. The program supplies supplemental funds to school districts with high concentration of poverty to support the school’s educational goals.” Therefore, the expanded operating hours would advance social equity and cohesion by facilitating attendance at the Virginia Robinson Gardens by more students, including those who attend Title I schools. In this way the proposed change does enhance the goals stated by the Department of Parks and Recreation.

The Draft SEIR states that the proposed change in operating hours of 9:30 a.m. to sunset Monday through Sunday would enable the Virginia Robinson Gardens to serve the needs of more school children and the general public. The commenter states that having the facility open until sunset will not serve the needs of school children. The hours of 9:30 a.m. until sunset would meet the needs of school children who attend the facility in the morning during school days and the general public would benefit from the facility staying open until sunset. Please refer to Master Response 10.

Response to Comment 89-10:

This comment is regarding the information in the Project Description section of the Draft SEIR regarding Special Use Events and parking for events and that no monitoring of street parking or vendor parking has ever existed by the Gardens outside of its driveway. The commenter states that the Virginia Robinson Gardens has encouraged street parking to attend events and cited a statement on the venue’s website. The commenter also states that the City of Beverly Hills has the right to deny any valet parking permit. This comment is noted. The project description includes a section regarding Special Use Events and how parking is handled. As detailed on page 2-4 of the DSEIR, regarding Special Use Events, a parking/transportation plan is developed to use either valet or shuttle vans to bring guests to the Gardens from off-site parking areas and parking permits are requested from the City of Beverly Hills. All City of Beverly Hills ordinances for parking and time limits for events are adhered to for each event. Parking monitors are in place at the front gate during the load in and load out for each event to assure compliance by participants. Please refer to Master Response 3.

In Section 3.18, Transportation, of the Draft SEIR, event parking is further addressed. Up to 35 vehicles can be parked on the Project Site with stacked parking. A pickup/ drop-off operation is also used as needed, where the driver drops off the guest and is on call for pickup. This ensures that guests are picked up by the same driver and in the same car when they leave. No street parking is permitted to occur on Elden Way, by either event guests or valet parking staff. Valet parking is used for Special Use Events that are larger. These larger events include an application for a valet permit and a special use event permit from the City of Beverly Hills. A street parking permit is issued by the City. Off-site parking is also made

available for some events, so that guests can be shuttled to the Project Site and the need for on-street parking by valets can be reduced or eliminated, depending on the event plan. Please refer to Master Response 2.

The commenter states that offloading deliveries on Cove Way “only creates impacts on another residential streets...” and that the Draft SEIR ignores this. This comment is noted. The project description states that for Special Use Events deliveries are scheduled by time and vehicle size. Vehicles that do not fit down the driveway are off-loaded on streets other than Elden Way. As detailed in Section 3.18, Transportation, on page 3-62 of the Draft SEIR states: “Setup and deliveries for Special Use Events is tightly regulated and scheduled by the County and the Friends of the Virginia Robinson Gardens working in tandem to minimize the effect on the surrounding neighbors. Vendors are assigned arrival and load out times. Prior to the event, they receive a packet of information on the dimensions of the driveway and the address for offsite parking, etc. Preferred rental companies and vendors are used. Delivery trucks are required to park along Crescent Drive on the north side and use a smaller truck to shuttle the rental items to the Project Site. Loading out is not permitted on Sundays after Saturday events. Whenever possible, back-to-back events use the same setup to reduce load-in and load-out by 50 percent.” Therefore, the Draft SEIR does address deliveries in the Section 3.18, Transportation.

The comment regarding past web postings regarding the Virginia Robinson Gardens not requiring the use of preferred rental companies for events is noted. As stated in Section 3.18, Transportation, page 3-62 of the Draft SEIR, states: “Preferred rental companies and vendors are used.” This comment does not raise any issues regarding the content or adequacy of the environmental analysis in the Draft SEIR for the Proposed Project and does not raise a specific environmental issue.

The commenter states that “Most of us have lived directly adjacent to the GARDENS for many years. The GARDENS has never contacted us in advance about upcoming events. Advance contact will not matter if concerns are ignored, which is the likely result given the conclusions of the DSEIR.” This comment is noted. This comment does not raise any issues regarding the content of the environmental analysis in the Draft SEIR for the Proposed Project and does not raise a specific environmental issue.

The commenter states that past understandings have restricted special uses to fundraising events and that the commenter believes that holding of such events likely violates the Bequest of the Gardens to the County and creates impacts which cannot be mitigated. This comment does not raise any issues regarding the content or adequacy of the environmental analysis in the Draft SEIR for the Proposed Project and does not raise a specific environmental issue as it discusses past understandings and does not comment on the Draft SEIR. This comment is noted. No further response is required.

Response to Comment 89-11:

This comment states “Only current and past mismanagement of the GARDENS can explain any lack of ability of families and children presently to enjoy the GARDENS. No documentation is offered to support this conclusion.” This comment is regarding management of the Virginia Robinson Gardens. This comment does not raise any issues regarding the content or adequacy of the environmental analysis in the Draft SEIR for the Proposed Project and does not raise a specific environmental issue as it discusses

past understandings and does not comment on the Draft SEIR. This comment is noted. No further response is required.

This comment also states that the Gardens has increased family events and onsite botanical related classes without any operational changes. This comment is about what the facility has done during the interim period between the announcement of the proposed changes and the issuance of the Draft SEIR. This comment does not raise any issues regarding the content or adequacy of the environmental analysis in the Draft SEIR for the Proposed Project and does not raise a specific environmental issue as it discusses past understandings and does not comment on the Draft SEIR. This comment is noted. No further response is required.

Response to Comment 89-12:

This comment is regarding the operational changes which are proposed in the Draft SEIR. This comment states that operational changes propose to expand the level of public use of the Virginia Robinson Gardens by extending the hours of operation and days, the types of programs, and use of public transportation (as detailed in Section 2.4 Project Description, on page 2-5 of the DSEIR for the Proposed Project). This comment states that the operational changes do nothing to expand the use of public transportation and that closest public transportation drop point for the one Metro Bus Route (Sunset #2) that serves the Project Site is approximately one-half mile away and involves an uphill walk to the Project Site.

Page 3-27 of Section 3.12.3, Environmental Impacts, of the Draft SEIR states the following regarding public transportation: "Additionally, with advanced reservations, visitors would be allowed to arrive at the Project Site on foot or be dropped off at the gate. This would support the current trend of visitors from the adjacent neighborhood walking to the site, as well as the current social promotion of the use of public transportation and alternative modes of transportation (such as Uber, Lyft, and taxis)."

Additionally, on page 3-69 of Section 3.18, Transportation, under the Parking Analysis heading, the Draft SEIR states: "Currently, the largest challenge with parking is the public using nearby neighborhood streets for parking, which causes congestion. To offset this, the County proposes to promote the use of public transportation services and rideshare services such as Lyft or Uber. The proposed advertisements do not include new physical signage, markings, or other parking-related changes. The proposed activity is a promotional approach to encourage outside transportation services with the intent of reducing vehicle activity on and near the Project Site." Virginia Robinson Gardens is not able to mandate anyone to utilize public transportation to visit or depart from their location. However, the County proposes to advertise, using a promotional or informational approach, to encourage public and other alternative transportation methods. Please refer to Master Responses 2 and 3.

Response to Comment 89-13:

This comment refers to the increased number of Special Use Events, which per page 2-5 of the Draft SEIR "would generate critical revenue for the Gardens, to offset the costs to operate and maintain this historic landmark." The comment goes on to state that "If the County cannot afford the GARDENS, it should

rescind its acceptance of the Gift..."This comment also states that the Draft SEIR should discuss the County's finances as it relates to the Gardens and the commenter states that the Bequest says nothing about the Gardens having to pay its own way. Finances are not discussed in the Draft SEIR because they are not a CEQA issue, as detailed below. Per Section 15273, Rates, Tolls, Fares, and Charges, of CEQA:

"(a) CEQA does not apply to the establishment, modification, structuring, restructuring, or approval of rates, tolls, fares, or other charges by public agencies which the public agency finds are for the purpose of:

- (1) Meeting operating expenses..." No further response is required.

This comment also states that "...the general public will not enjoy any real values from increased special events" and the comment goes on to provide additional explanation regarding the costs associated with special events as well as what the commenter believes the Virginia Robinson Gardens can charge for special events. The comment also states that the Draft SEIR does not demonstrate a financial benefit from special events. These comments regarding revenue and costs of special events do not raise any issues regarding the content or adequacy of the environmental analysis in the Draft SEIR for the Proposed Project and do not raise a specific environmental issue. This comment is noted. No further response is required.

Response to Comment 89-14:

The commenter states that it is not true that the Proposed Project does not include any ground disturbing activities normally associated with grading, demolition, or construction. The reference by the commenter that the project "does not include any ground disturbing activities normally associated with grading, demolition, or construction" is from page 2-5 in Section 2.4, Project Description, of the Draft SEIR. The temporary placement of dance floors, placement of tents, and overhead lighting for an event would all be promptly removed after the event has concluded. No grading or removal of soil, no, demolition of permanent structures, and no construction of new permanent structures would occur with the Proposed Project. Therefore, the statement from page 2-5 of the Draft SEIR is accurate. No further response is required.

Response to Comment 89-15:

This comment is regarding the operating hours of the Virginia Robinson Gardens and that the proposed change in operating hours of 9:30 a.m. to sunset Monday through Sunday would enable the Gardens to serve the needs of more school children and the general public. As detailed in Table 2-1, Proposed Operational Changes, on page 2-5 of the Draft SEIR, closing at sunset is common for other County parks. This comment cites the prior public comments related to scoping which provide operating hours for similar botanic gardens and arboretum operated by the County. This comment does not raise a specific environmental issue as it re-states the text in the Draft SEIR that under the Proposed Project the Virginia Robinson Gardens would close at sunset. This comment is against the facility closing at sunset every day of the year. This comment states that the facility closing at sunset "should be fully and fairly discussed in the DSEIR." This comment is noted. The proposed closing time of the Virginia Robinson Gardens is discussed in multiple places throughout the Draft SEIR, on the following pages:

- Page 1-2, which states: "The proposed change in operating hours of 9:30 a.m. to sunset Monday through Sunday would enable the Gardens to serve the needs of more school children and the general public."
- Page 2-5, which states: "9:30 a.m. to sunset (as common for other County parks)."
- Page 2-6, which states: "DPR proposes that the Gardens be open from 9:30 a.m. to sunset. Sunset is typically 7 to 8 p.m. in the summer and 5 to 6 p.m. in the winter. This means the Gardens would be open for up to 10.5 hours in the summer and 8.5 hours in the winter. Current hours are from 9:30 a.m. to 4:00 p.m., which translates to a duration of 6.5 hours. The proposed increase in the number of visitors would be spread over the increased hours of operations. The current operational restrictions of 6.5 hours a day, six days a week limits the Gardens ability to fulfill
- the mission of Virginia Robinson's bequeathment to the County. By allowing the Gardens to welcome the public until sunset, as most other public gardens and parks do, students and the public would have greater access."
- Page 3-60, which states: "By allowing the Gardens to welcome the public until sunset, as most other public gardens and parks do, students and the public would be granted greater access. The proposed extended hours would also allow the Gardens to develop an afterschool program for children and allow families to visit the Gardens after school or work. Additionally, the Gardens would be able to offer more science and botanical education programs to Title I schools. As such, the Proposed Project would increase the public availability and use of the Project Site, including the botanical gardens and grounds. This increase in public availability resulting from the Proposed Project would remain within the original intent and boundaries set forth by the Robinson Will.

The proposed increase in the number of maximum daily visitors would be spread over the increased hours of operations and additional day.

- Page 3-64, which states: "The trip generation also considered the hours of operation in the calculation of trips and 8.5 hours for an average length of site operations ending at sunset... The daily operational period would be extended further into the evening, until sunset rather than 4:00 p.m., and Sunday operations would be included in the typical weekly schedule."

This comment also states that students will not benefit from the expanded hours as schools end during the current operating hours of the gardens. Please refer to Response to Comment 89-9.

Response to Comment 89-16:

This comment is regarding the Proposed Project's increase in the number of daily visitors from 100 to 200. The commenter asks why there is an increase in visitors to 200 "when actual demand is 20 persons/day." The commenter also asks about the "additional hypothetical demand." On page 2-5 of the Draft SEIR in Table 2-1, Proposed Operational Changes, the project proposes up to 200 visitors per day for docent tours, seminar/classes, or commercial filming (video only, no motion picture) or a combination of any of these activities. The visitor maximum does not include staff, volunteers, or security. The extended hours

would allow for increased opportunity for additional patrons to visit the Gardens, hence the proposed increase in the number of allowed daily visitors.

The commenter states that having timed visits does not help if the visitors decide to stay longer and enjoy the property beyond any tour. Page 2-1 of the Draft SEIR states that visitors are led through the Gardens by a trained docent on a 90-minute walking tour and are not allowed to tour the property unattended. Visitors must immediately leave following the tour/event.

The commenter also states that the daily visitor count “should reflect the actual parking situation at the GARDENS” and goes on to describe that the existing parking lot at most holds 35 cars for public parking and that the parking situation is “tight under current usage.” The commenter further states that the “DSEIR fails to address the parking when it talks about increasing the daily visitor situation.” On page 2-6, the Draft SEIR states that 35 parking spaces are available on the property. Figure 2-3, Virginia Robinson Gardens Parking Map, will be added the Draft SEIR as part of the Errata section of this Final SEIR (Section 4.0). To offset congestion on neighborhood streets, the County proposes to encourage visitors to use public transportation services and rideshare services such as Lyft or Uber. Per page 1-2 of the Draft SEIR, all visits would continue to be by reservation only with no street parking or buses on Elden Way. All cars must park onsite for smaller events. Parking attendants monitor the gates on Elden Way and visitors are directed to park on the property. Page 3-69 of Section 2.4.5, Parking, of the Draft SEIR addresses parking for the Proposed Project. Parking on the property will remain the same (35 spaces available) and there will continue to be no parking on Elden Way. Parking is reserved when visitors make reservations for a tour. The Gardens can accommodate up to 35 cars with stacked parking which is adequate for smaller events. For larger events, valet service is required. The event must receive a Valet Permit and Special Event Permit from the City of Beverly Hills. A Street Parking Permit is issued by the City of Beverly Hills. For Special Use Events, the Gardens will continue to promote the use of shuttle service from offsite locations to reduce the number of trips and all events will require a parking/transportation plan. Special Use Event parking management is based on the total number of guests expected. Please refer to Master Responses 2 and 3.

The increased number of visitors and parking is discussed on page 3-3 of the Draft SEIR. An increased number of visitors would occur with the Proposed Project. “The increased number of visitors moving through the surrounding neighborhood would create a new, short-term, visual element to the project area. However, all daily visitors to the Gardens would continue to be by reservation only (up to 200 per day). All vehicles would park within the onsite 35 parking spaces, with no street parking or bus parking on Elden Way. The Gardens can accommodate up to 35 cars with stacked parking which is adequate for smaller events. Currently, during larger Special Use Events, vehicles arrive at the Project Site and cars are parked in the surrounding neighborhood (by valet); this would continue with the Proposed Project. This is consistent with events already held in the area by surrounding residences and would not be a condition unique to the Proposed Project Site.” As detailed on page 3-3 of the Draft SEIR, “Smaller events can accommodate up to 35 cars with stacked parking.”

As described on page 3-27 of the Draft SEIR, under the Proposed Project, an advanced parking reservation would continue to be required to ensure that visitors park on site to the greatest extent possible; street parking by visitors on Elden Way would continue to be prohibited. Additionally, with advanced

reservations, visitors would be allowed to arrive at the Project Site on foot or be dropped off at the gate. This would support the current trend of visitors from the adjacent neighborhood walking to the site, as well as the current social promotion of the use of public transportation and alternative modes of transportation (such as Uber, Lyft, and taxis). Please refer to Master Response 1.

Response to Comment 89-17:

This comment is regarding the uses that would continue on the Project Site. The commenter states that the Draft SEIR fails to address whether the original Virginia Robinson bequest supports the use of “commercial” events and that commercial uses on site “likely constitute a legal forfeiture of the bequest and that the events do not support the use of the Virginia Robinson Gardens as a “botanical” center. This comment is about the bequest to the County and does not raise a specific environmental issue. As detailed on page 2-5 of the Draft SEIR, in Table 2-1, Proposed Operational Changes, in addition to the existing uses on site, the Project proposes adding private and family ceremonies such as weddings. No other changes to the type of events held are proposed. This comment is noted. Please refer to Master Response 8.

Response to Comment 89-18:

This comment is regarding the 24 Special Use Events per year that are proposed by the Project. The commenter states that the proposed 24 Special Use Events would disrupt the reasonable enjoyment of the peace and quiet in a historical residential neighborhood. It should be noted that the Project proposes up to 24 special events per year (up to 4 events per month) and as such fewer than 24 special events may be held annually. In addition, Section 3.14, Noise, of the Draft SEIR analyzes the potential noise impacts of the Proposed Project, including the Special Use Events. On page 3-44 of the Draft SEIR, the text states: “The Project is proposing to increase the number of Special Use Events occurring on the Project Site from 4 to 24 (up to 4 events per month) and increasing the maximum number of visitors per day from 100 to 200. Operational noise sources associated with the increased activity at the Gardens include mobile (i.e., traffic) and stationary (i.e., people talking, crowd noise, and amplified music) sources.” Please refer to Master Response 4.

Regarding operational off-site traffic noise, increasing the number of Special Use Events and daily visitors would result in additional traffic on adjacent roadways, thereby increasing vehicular noise in the Project vicinity. However, as detailed on page 3-46, the noise analysis found that the Proposed Project’s contribution of offsite traffic noise because of increased daily visitors would be less than significant.

Regarding operational onsite stationary noise, as detailed on page 3-47, “Onsite noise as a result of Special Use Event activities (i.e., amplified sound and crowd noise) has been calculated using the SoundPLAN 3D noise model, which predicts noise propagation from a noise source based on the location, noise level, and frequency spectra of the noise sources as well as the geometry and reflective properties of the local terrain, buildings, and barriers... It is noted that Project noise modeling represents a worst-case scenario in which all potential Project noise sources are being generated at full intensity at the same moment. It is very unlikely that noise levels as a result of Special Use Event activities would reach that of those predicted in Table 3.14-8 [of the Draft SEIR].” The Draft SEIR further states, on page 3-53 that while

noise generated at the Project Site during a Special Use Event with implementation of the Proposed Project would be similar to what could occur during a currently-allowed Special Use Event, this analysis utilizes the City's noise/land use compatibility thresholds (see Table 3.14-5 of the Draft SEIR) for residential receptors in order to address the noise-related effect of increasing the frequency of special events from four events to approximately 24 events annually. The noise analysis regarding Special Use Events concludes that the Proposed Project's contribution of stationary-sourced noise would result in a less than significant impact with Mitigation Measure NOI-1 which requires that a noise-reduction operations program shall be implemented prior to all Special Use Events employing the use of amplified sound (refer to pages 3-54 and 3-55 of the DSEIR for details). Please refer to Master Responses 4 and 5.

The commenter also opines that the rationalization for additional events is a commercial one and not a public one. Please refer to Master Response 9.

The commenter states that the DSEIR should include the existing budget for the Gardens and the entire Department of Parks and Recreation. As detailed in Response to Comments 89-13, finances are not discussed in the Draft SEIR because they are not a CEQA issue, as detailed below. Per Section 15273, Rates, Tolls, Fares, and Charges, of CEQA:

"(a) CEQA does not apply to the establishment, modification, structuring, restructuring, or approval of rates, tolls, fares, or other charges by public agencies which the public agency finds are for the purpose of:

- (1) Meeting operating expenses..." No further response is required.

Response to Comment 89-19:

This comment states that parking on the property will remain the same and states that the Project Site has fewer than 35 parking spaces. The comment also states that sixteen vehicles would be used by a mix of volunteers and maintenance staff, leaving 19 spaces to meet the needs of the Proposed Project. This comment is noted. Please refer to Response to Comments 89-6 which details the discussion parking associated with the Proposed Project. Figure 2-3, Virginia Robison Gardens Parking Map, is included in the Errata section of this Final SEIR (Section 4.0).

This comment discusses street parking and mentions a recent public hearing held by the Beverly Hills City Council, who the commenter states expressed an interest in enforcing parking bans on area streets if the County significantly increased special events at the Gardens. The portion of this comment that refers to the Beverly Hills City Council hearing does not raise any issues regarding the content or adequacy of the environmental analysis in the Draft SEIR for the Proposed Project and does not raise a specific environmental issue as it discusses a public hearing. This comment is noted. No further response is required.

The comment also states that under City rules, residents on nearby streets can implement permit parking only and no parking bans on all adjacent streets for special events and all activities at the Gardens. This comment references City of Beverly Hills Municipal Code 7-3-206. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft SEIR for the Proposed Project and does

not raise a specific environmental issue as it discusses the City's Municipal Code. This comment is noted. Please refer to Comment Responses 2 and 3.

The comment also states that the Draft SEIR does not address the impacts generated from the six-fold special events increase and doubling the daily attendance and that traffic and parking are inseparable impacts. Please refer to Response to Comments 89-6 which details the discussion of increased visitors and parking associated with the Proposed Project. The commenter is also referred to Master Responses 1, 2, and 3.

Response to Comment 89-20:

This comment states that the following text from page 3-1 of the Draft SEIR is inaccurate: "Therefore, any views of the Project Site from public streets are obstructed, except from the terminus of the Elden Way cul-de-sac at the entrance of the Project Site." The commenter also states that the Project Site, particularly the Rose Garden and Palm Grove are directly visible from Carolyn Way. The text preceding the statement quoted above states: "The surrounding residential streets feature extremely dense landscaping along the privately-owned properties that include hedges, shrubs, and mature trees. In addition, some properties are bordered by stone walls and gates." With this text the author is stating that due to the developed nature of the project vicinity and the presence of dense landscaping, walls, and gates, there is a limited view of the Project Site from public streets. This comment is noted.

Response to Comment 89-21:

This comment disagrees with the statement on page 3-3 of the Draft SEIR that the increased number of visitors moving through the surrounding neighborhood would create a new, short-term visual element to the project area. The Proposed Project would not construct new buildings, alter existing buildings, change landscaping, or alter the visual aspects of the Project Site in any way. As such, the Proposed Project would not degrade the visual character or quality of the site or its surroundings. As detailed on page 3-3 of the DSEIR currently, during Special Use Events, vehicles arrive at the Project Site and cars are parked in the surrounding neighborhood (by valet); this would continue with the Proposed Project. This is consistent with events already held in the area by surrounding residences and would not be a condition unique to the Project Site. This comment is noted.

The commenter repeats the previous comment made that the Draft SEIR does not demonstrate how the Gardens can accommodate 35 cars. As detailed on page 3-3 of the DSEIR, "Smaller events can accommodate up to 35 cars with stacked parking." Please refer to Response to Comments 89-16 for a discussion of parking. This comment is noted. No further response is required.

The commenter states that onsite parking will not accommodate the 200 persons per day visitor limits of the Proposed Project and asks what will happen is a visitor stays beyond tour time or come early. This comment also states that visitors will park on nearby streets and states that the Draft SEIR ignored "this obvious inference" regarding street parking. Regarding a visitor staying late, page 2-1 of the DSEIR states the following: "Visitors must make a parking and guest reservation so that the Gardens know when they will come and how many cars and people to expect. No walk-ins are allowed. Visitors are led through the

Gardens by a trained docent on a 90-minute walking tour and are not allowed to tour the property unattended. Visitors must immediately leave following the tour/event. Street parking on Elden Way is not allowed. Parking attendants monitor the gates on Elden Way and visitors are directed to park on the property.” The Draft SEIR addresses parking on page 2-8 in Section 2.4.5, Parking. Regarding large events, page 2-8 of the DSEIR states: “For larger events, valet service is required. The event must receive a Valet Permit and Special Event Permit from the City of Beverly Hills. A Street Parking Permit is issued by the City of Beverly Hills. For Special Use Events, the Gardens will continue to promote the use of shuttle service from offsite to reduce the number of trips and all events will require a parking/ transportation plan. Special Use Event parking management is based on the total number of guests expected. Please refer to Master Responses 2 and 3.

This comment references numbers from a County website that is not currently posted online. This comment goes on to hypothesize regarding the number of persons associated with a “max event” based on the numbers from a website that no longer exists. This comment then asks where excess people from the “max event” will park. This comment is noted. No further response is required.

This comment also discusses valet parking in the City of Beverly Hills and states that valet parking requires a city permit. The commenter states that the Draft SEIR does not address concerns regarding what would happen if the City of Beverly Hills does not issue a valet permit. Page 3-69 of the Draft SEIR states: “In December 2009, the California Natural Resources Agency amended the CEQA Guidelines and the Appendix G Checklist to eliminate the checklist question regarding parking capacity. Case law recognizes that parking impacts are not necessarily environmental impacts (*San Franciscans Upholding the Downtown Plan v. City and County of San Francisco*, *supra*, 102 Cal.App.4th at 697). The focus of the CEQA analysis, rather, is on direct and indirect physical impacts of a project on the environment. Parking is usually a social and not an environmental impact, unless there are secondary adverse physical effects on the environment resulting from a project’s impact on available parking (*Save Our Access – San Gabriel Mountains vs. Watershed Conservation Authority*, 68 Cal.App.5th 8). Therefore, parking is not typically an environmental impact requiring analysis in a CEQA document (California Natural Resources Agency 2009).” Nonetheless, given that the Project Site is surrounded by narrow neighborhood streets, parking issues were addressed qualitatively in the Draft SEIR.

The commenter asks where the parking is for special events service employees and service vehicles and states that in the past those vehicles have parked in neighboring streets, which should be analyzed in the Draft SEIR. The Draft SEIR includes an analysis of parking in Section 3.18, Transportation, which includes a parking analysis on page 3-70. Please refer to Master Responses 1, 2, and 3.

Response to Comment 89-22:

This comment is regarding lighting from the Proposed Project and light pollution, which the commenter states “the DSEIR fails to mention, much less address.” The Project Site is in an urban and developed area of the City of Beverly Hills. Therefore, lighting from events held at the Project Site would incrementally contribute to the overall lighting in the Project area, including existing lighting from homes and streetlights. The 2014 SEIR did not identify any significant project impacts to aesthetics associated with the previous operational changes at the Gardens. As described on page 3-2 of the Draft SEIR, “This

lighting would also be consistent with the lighting elements of adjacent neighborhood (as hosting Special Use Events is commonplace in this neighborhood and throughout the City of Beverly Hills) and would not create a significant new source of light. The Draft SEIR concludes that impacts would be less than significant therefore mitigation measures are not required.

This comment states that lighting will have an adverse impact on the hundreds of birds and wildlife species that the Draft SEIR references and that the Draft SEIR's discussion of this issue is inadequate. As detailed on page 3-3 of the Draft SEIR, "The Proposed Project would increase Special Use Events from 4 per year to 24 per year, and evening events would be offered that could include temporary outdoor lighting. The lighting would be directed toward a specific area of the Project Site." As described in that paragraph above, lighting would also be consistent with the lighting elements of adjacent neighborhood (as hosting Special Use Events is commonplace in this neighborhood and throughout the City of Beverly Hills) and would not create a significant new source of light.

Response to Comment 89-23:

This comment is regarding the statement on page 3-9 of the Draft SEIR that "there is no likelihood of the Project traffic exceeding CO values. This impact is less than significant." This comment refers to the SCAQMD guidelines and states that they do not truly reflect the added burden of a degraded environment in the immediate vicinity of the Gardens. This comment is noted. The analysis of potential air quality impacts has been conducted in compliance with standard air quality and greenhouse gas analysis protocol. No further response is required.

The commenter states that the Draft SEIR did not include baseline air quality monitoring of the location, no computer modeling, and no standard methodologies to quantify air quality impacts and that it relied upon area/regional studies (referring to the CO hot spot study from 1992). The commenter is correct that air quality monitoring at the Project Site was not taken. This is because regional emissions information is typically used in CEQA analysis. This comment is noted. The commenter is mistaken regarding the analysis having "no computer modeling, no standard methodologies to quantify air quality impacts." As detailed on page 3-7 of the Draft SEIR "Criteria air pollutant emissions were modeled using the California Emissions Estimator Model (CalEEMod), version 2020.4.0. CalEEMod is a statewide land use emissions computer model designed to quantify potential criteria pollutant emissions associated with both construction and operations from a variety of land use projects. Long-term operational emissions as a result of the Proposed Project would mainly be attributed to the proposed increase in daily visitors and the number of Special Use Events... As shown in Table 3.4-1, the Project's emissions would not exceed any SCAQMD thresholds for any criteria air pollutants during operation as a result of increased visitors. This impact is less than significant." Please refer to Appendix A of the Draft SEIR for CalEEMod version 2020.4.0 Model Data Outputs. No further response is required.

The CO hot spot study described on pages 3-8 and 3-9 in Section 3.9, Greenhouse Gas Emissions, of the Draft SEIR is one that is typically cited in greenhouse gas analysis. The technical analysis for potential greenhouse gas emissions analysis in the Draft SEIR is not citing an outdated study and trying to apply it to the Proposed Project; the analysis is simply citing a study that established the parameters by which CO hotspots are measured.

This comment re-stated the commenter's scoping comments that any analysis of traffic should focus on the local streets surrounding the Gardens and not major freeways. This comment goes on to list the intersections the commenter believes are most relevant for study. This comment is noted. Section 3.18, Transportation, of the Draft SEIR reviewed the environmental setting including the existing roadway system in the vicinity of the Project Site. As detailed on page 3-64 of the DSEIR:

"The Project study area included the following eight study intersections located along the primary access routes to and from the Project Site (Figure 3-5):

1. Beverly Drive and Lexington Road
2. Crescent Drive and Lexington Road*
3. Elden Way and Crescent Drive*
4. Oxford Way and Lexington Road*
5. Hartford Way and Lexington Road*
6. Hartford Way and Cove Way*
7. Benedict Canyon Drive and Roxbury Drive*
8. Benedict Canyon Drive and Lexington Road"

Therefore, the environmental analysis for the Proposed Project does focus on local streets and not major freeways. No further response is required.

This comment cites the following court case: *Sierra Club v. Fresno*, (2018) 6 Cal 5th 502, in which the commenter states the court ruled that an EIR must either make a reasonable effort to correlate a project's significant air quality impacts to potential health consequences or explain why providing such an analysis is not feasible. The commenter states that "the agency and its consultant effectively made no effort to quantify the air quality impacts nor the associated health impacts on a local area basis." Please refer to the earlier response given as part of this comment response.

Response to Comment 89-24:

This comment is regarding the biological resources analysis in the Draft SEIR that concluded that the Proposed Project would have a less than significant impact on biological resources. The commenter is correct that the Draft SEIR does conclude that Project impacts to biological resources would be less than significant. Please refer to Section 3.5, Biological Resources of the Draft SEIR. The comment refers to the Garden's website and what the website states regarding soils and plant growth on the Project Site. The commenter's reference to the Garden's website does not raise any issues regarding the content or adequacy of the environmental analysis in the Draft SEIR for the Proposed Project and does not raise a specific environmental issue. This comment is noted. No further response is required.

This comment also asks what the existing protocols are to protect the Gardens, including plant species and wildlife. Page 3-11 of the Draft SEIR states: "The Proposed Project does not include construction or land alteration activities that could result in the removal of existing vegetation or the addition of new vegetation at the Project Site. Existing protocols and precautions to protect the integrity of the structures and gardens will ensure that existing vegetation remains undisturbed by the proposed increase in visitors.

Common wildlife would continue to benefit from the habitat that the gardens provide, and the biological functions and values associated with the existing environment would remain unchanged. A less than significant impact would occur.” Therefore, the analysis in the Draft SEIR focuses on the potential impacts of the Proposed Project and does not specifically state the existing protocols, which can be obtained by contacting the Virginia Robinson Gardens.

Response to Comment 89-25:

This comment is regarding the Special Use Event guidelines referenced in the Draft SEIR. This comment is noted.

The comment references the Garden’s website. This comment is regarding the content of the Garden’s website and does not raise any issues regarding the content or adequacy of the environmental analysis in the Draft SEIR for the Proposed Project and does not raise a specific environmental issue. This comment is noted. No further response is required.

The comment also states that the cultural section “fails to adequately discuss key impacts to the GARDENS.” This comment does not specify what those “key impacts” are. Section 3.6, Cultural Resources, addresses potential cultural resources impacts of the Proposed Project. As stated on pages 3-12 and 3-13 of the Draft SEIR: “The proposed operational changes are consistent in type of use, use guidelines and rules, and long-term management that are already in place. The proposed operational changes will work to promote local historic preservation goals through continued public use and awareness though increased and enhanced regulated access to the Virginia Robinson Gardens. Though these proposed operational changes will increase public use of the property, there will be no associated physical changes to the Virginia Robinson Gardens (ECORP 2022; Appendix C). Therefore, there will be no significant impact to the character-defining features or aspects of integrity of the Project Site.” The Draft SEIR for the Proposed Project concluded that there would be less than significant impacts.

Response to Comment 89-26:

This comment is regarding the source of energy for the Gardens and states that the Draft SEIR neglects to discuss that the Gardens does not get its electricity from the Clean Power Alliance. Section 3.7, Energy, of the Draft SEIR analyzes the potential energy impacts of the Proposed Project. This comment is noted and no further response is required.

Response to Comment 89-27:

This comment is regarding the South Coast Air Quality Management District’s 3,000 metric tons of CO₂e threshold for greenhouse gas impacts. The commenter states that it is important for decisionmakers to determine what amount of greenhouse gas will be emitted from a project change. This comment is noted. As detailed in Section 3.9, Greenhouse Gas Emissions, of the DSEIR, page 3-19 states: “...the SCAQMD’s 3,000 metric tons of CO₂e per year threshold is used as the significance threshold in addition to the qualitative thresholds of significance set forth below from Section VII of CEQA Guidelines Appendix G.” Therefore, this is an established threshold for analysis of GHG under CEQA and as such, was used in the analysis. This comment is noted, and no further response is required.

This comment states that “Authorities tell us 27% of total greenhouse gas emissions in the United States come from transportation.” This comment provides a statistic from an unknown source regarding greenhouse gas emissions in the United States and does not raise any issues regarding the content or adequacy of the environmental analysis in the Draft SEIR for the Proposed Project. This comment is noted. No further response is required.

The commenter refers to a table in the greenhouse gas section of the Draft SEIR that states that mobile sources from the project will increase greenhouse gases by 117 metric tons per year and states that “...the project compels serious consideration of mitigation to reduce the potential greenhouse gas [from the Proposed Project].” This comment is noted. As detailed on page 3-20 of the Draft SEIR for the Proposed Project, “As shown in Table 3.9-1, operational-generated emissions [of 117 metric tons per year] would not exceed the SCAQMD’s numeric bright-line threshold of 3,000 metric tons of CO₂e annually. This impact is less than significant.” No further response is required.

This comment states that public transport is not a viable trip reducer and that Uber/Lyft will likely produce equivalent or greater emissions due to idle time for pickups/drop-offs; greenhouse gas emissions for private vehicle travel merit consideration for effective mitigation. This comment is speculative regarding the potential emissions of using Uber/Lyft versus potential emissions from private vehicles. This comment is noted. No further response is required.

Response to Comment 89-28:

This comment is regarding a statement in the Draft SEIR that the Proposed Project would comply with all applicable City codes and regulations regarding emergency response/evacuation. This comment does not raise any issues regarding the content or adequacy of the environmental analysis in the Draft SEIR for the Proposed Project and does not raise a specific environmental issue. This comment is noted. No further response is required.

This comment also states that safety issues compound because emergency vehicles “do not have complete access to the GARDENS’ property. First responders can access a large area of the property only on foot. A building overhang on the property blocks access to the property to rescue and emergency vehicles.” The comment states that the Draft SEIR fails to discuss this important concern. Please refer to Master Response 6 and 7.

The “building overhang” referenced in this comment is an existing condition. The Proposed Project would not physically alter any existing structures. Therefore, this is not discussed, as it is not a part of the Proposed Project.

Response to Comment 89-29:

This comment is regarding the water demand of the Proposed Project. The commenter states that “The Special Events have the potential to add 24,000 water users to the property over the year.” The commenter states that the Gardens is one of the City of Beverly Hill’s largest water users. The commenter goes on to state that increasing the daily attendance, hours of operation, and increase in special events will trigger an increased water demand that must be discussed in the Draft SEIR. This comment is noted.

Section 3.11, Hydrology and Water Quality, discusses water demand. Pages 3-24 and 3-34 of the Draft SEIR state the following: "While the Proposed Project would increase visitation to the Project Site on a weekly basis (due to the increase in daily hours and the additional operational day) and annually (due to the increase of Special Use Events), the Project would not result in a substantial water demand that would require the Metropolitan Water District (MWD) to obtain more water resources from groundwater sources (refer to Section 3.20. Utilities and Service Systems of this SEIR for further information regarding project-related water demand)."

Section 3.20, Utilities and Services Systems also analyzes the water demands of the Proposed Project. Page 3-74 and 3-75 state: "The Proposed Project would result in an intermittent increase in visitors at the Project Site due to increased operational hours (average of three hours per day) and extended an additional day each week (open to the public seven days per week compared to six), increased maximum daily attendance to 200 visitors, and up to twenty additional Special Use Events annually. Additional visitors would cause an incremental increase in demand for water while at the Project Site primarily associated with restroom use. For daily use, visitors utilize restroom facilities on site, associated with the existing residence and Pool Pavilion. For special uses, visitors utilize restroom facilities on site and VIP portable facilities are arranged for the facility. As such, Special Use Events do not generate a substantial increase in water demand as much of the services are portable and brought to the Project Site (including water, electricity, and sewage provided by the VIP portable facilities). In any event, the Proposed Project would not result in the need for construction of new facilities at the Project Site or change the existing land uses. In addition, the Proposed Project would not induce substantial population growth in the Project Area. As such, the increase in water demand at the Project Site would conservatively be based on up to 800 additional visitors per week (up to 41,600 visitors annually) and 350 additional visitors per twenty additional special uses (up to 7,000 visitors annually). Based on this conservative estimate, the Proposed Project would increase water demand by approximately 171,072 gallons annually (0.0005 mgd). The Gardens' water demand would be accommodated through the City's existing entitlements with MWD and would not require new or expanded water treatment facilities. Impacts related to water supply would be less than significant." No further response is required.

This comment references the drought warnings issued by the Governor of California and the Metropolitan Water Department and requests by the Governor to reduce water usage. This comment states that the Draft SEIR "fails to state how the County will meet these conservation goals for the GARDENS." This comment states that the Draft SEIR does not discuss the following: the possibility of water restrictions becoming more stringent and the City's potential to enforce ordinances to fine users for excess water use. Please refer to the paragraph directly above which addresses potential water impacts of the Proposed Project and concludes that the Project would have a less than significant impact regarding water usage. Additionally, per page 3-74 of the Draft SEIR "The Gardens incorporates various features to reduce water demand on site. Water-wise, Mediterranean shrubs, grasses, and groundcovers complement the architectural theme and also reduce overall water use in the landscape. An automatic irrigation system with low volume equipment minimizes water loss due to run-off. Groundcovers and bark mulch help conserve water, lower the soil temperature, and reduce evapotranspiration. Water usage is also continuously monitored. The Proposed Project would comply with the Water Shortage Contingency Plan

outlined in the Beverly Hills 2020 UWMP, if implemented. For example, limits may be applied to the number of days, frequency, and duration of outdoor watering." No further response is required.

Response to Comment 89-30:

This comment is regarding special events at a residential home and what would be required regarding City permits and the statement in the Draft SEIR regarding the Project seeking input from the City of Beverly Hills because no other agency approvals are required for the Proposed Project. The commenter is correct regarding what is stated in the Draft SEIR. Per page 3-27 "In addition to the County of Los Angeles (Lead Agency), no other agency approvals are required; however, as a courtesy to the City of Beverly Hills, input from the City will continue to be sought. As a good neighbor, the Department of Parks and Recreation aims to comply with the City's regulations. Impacts to land use and planning would be less than significant." This comment is noted. No further response is required.

Response to Comment 89-31:

Per page 3-26 of the DSEIR "By way of discretionary action, the County Board of Supervisors will consider an amendment to the existing Agreement between the County and The Friends of Virginia Robinson Gardens. Formally, this amendment will consist of revising Section 4.05 of the Agreement to reflect the proposed changes to the operation of Virginia Robinson Gardens. As such, the Proposed Project would maintain the consistency of the existing uses of the Project Site with, and would not conflict with, the existing City of Beverly Hills land use plans and regulations." Please refer to Master Responses 8 and 9.

Response to Comment 89-32:

This comment is regarding The Friends of the Robinson Garden fundraising as well as the percentage of the funds that are used on administrative expenses. This comment also cites a study regarding negative attributes of non-public funding. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft SEIR for the Proposed Project and does not raise a specific environmental issue with regards to the Proposed Project. Funding is not an environmental issue and as such, is not addressed in the Draft SEIR. This comment is noted. No further response is required.

Response to Comment 89-33:

This comment is regarding the statement in the DSEIR on page 3-27 that "Renting for private events is a normal operation and legal under the 501(c)(3) charitable tax designation." The comment also discusses the increase in special events and the Bequest for the Project Site. Funding is not an environmental issue and as such, is not addressed in the DSEIR. Please refer to Response to Comment 89-31 above and Master Responses 8 and 9. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft SEIR for the Proposed Project and does not raise a specific environmental issue with regards to the Proposed Project. This comment is noted. No further response is required.

Response to Comment 89-34:

This comment references the three Special Use Event scenarios in Table 3.14-8 of the Draft SEIR and states that "The operational changes, however, allow 4 special events in a single month and 24 events per year. This comment is noted. The table itself provides three scenarios and the environmental analysis in the Draft SEIR analyzes up to 24 Special Use Events per year, as described on page 1-2 of the Draft SEIR, which states "The proposed operational changes also include up to 100 additional visitors per day, excluding any staff, volunteers, or security on site. The number of Special Use Events would increase to no more than 24 per year." This comment is noted. No further response is required.

This comment also discusses scientific studies related to hearing loss and states "Whatever impacts the DSEIR states, noise from the proposed special events may, indeed, be exacting a greater human toll, especially on the neighborhood." This comment is noted. No further response is required.

Response to Comment 89-35:

This comment is regarding the statement on page 3-47 of the Draft SEIR which states that "The main source of noise at Special Use Events would be produced from amplified sound systems." However, the environmental analysis goes on to state "...however, it is noted that not all Special Use Events would have amplified music. Noise levels from amplified sound systems vary considerably and depend upon the size of the area intended to be served, the crowd size, and the nature of the amplified sound (e.g., music versus voice announcements)."

The comment also states that "An erroneous assumption exists with the noise modeling undertaken by the DSEIR. The noise model assumes the amplified sound system will be directly adjacent to the main house." The commenter further states that for some past events musical entertainment has been placed in front of the pool pavilion or tennis court, not adjacent to the home. The comment states that the noise analysis is incomplete without modeling the other potential sites on the property for amplified sound. The comment also states that "Additionally, and significantly, the DSEIR did no sound computer modeling from the tennis court for the Rose Garden. Both of these areas are directly adjacent to residents' homes."

As stated on page 3-52 of the Draft SEIR, noise generated as a result of Special Use Events occurring on the Project Site would be similar to existing conditions, the baseline of the analysis, because the proposed types of special uses to be held at the Gardens would be the similar as what currently occurs. Although weddings would be allowed at the Gardens, the noise from these events would be similar to what currently occurs during Special Use Events. The level of noise produced during an individual Special Use Event is not proposed to change compared to existing baseline conditions. Therefore, noise generated at the Project Site during a Special Use Event with implementation of the Proposed Project would be similar to what could currently occur during a Special Use Event.

For the purposes of providing information, three onsite noise-generating scenarios, as a result of Special Use Event activities (i.e., amplified sound and crowd noise), were calculated in the Draft SEIR using the SoundPLAN 3D noise model. These three scenarios were developed in order to provide a representation of typical events that would continue to occur under the Proposed Project. As stated on page 3-47 of the Draft SEIR, the Project noise modeling represents a worst-case scenario in which all potential Project noise

sources are being generated at full intensity at the same moment. The location adjacent to the main house was selected for the placement of amplified sound source based on 1) the common use of this area under current conditions and 2) its centrally located position relative to the property boundaries. As stated on page 3-47 of the Draft SEIR, the third modeling calculation accounts for high intensity amplified music (electrified, high energy, and fast tempo) within an area source of 10 feet by 32 feet as well as crowd noise within an area source 125 feet by 65 feet on the event lawn. This modeling scenario is intended to represent a worst-case scenario.

While it is acknowledged that that Special Use Event activities do occur at the tennis court and would continue to occur there under the Proposed Project, high intensity amplified music such as that modeled under the third scenario of the Draft SEIR would not. The sound power reference level employed in the modeling of the third scenario is 108.1 decibels at the source, equivalent to the noise level of a low-flying jet. Thus, the noise propagation results of the third scenario accounts for the typical Special Use Event activities that would occur at the tennis court.

Furthermore, as stated on page 3-53 of the Draft SEIR, Mitigation Measure NOI-1 is required to reduce onsite noise levels during Special Use Events with amplified music. Mitigation Measure NOI-1 would require that all property owners and occupants located within 500 feet of the Gardens' boundary be sent a notice at least five (5) days prior to commencement of all Special Use Events employing the use of amplified sound. Additionally, Mitigation Measure NOI-1 would reduce onsite Project noise by mandating that the sound amplification system at Special Use Events include a processor to control the maximum output of the speakers. All resulting noise emitted through speakers would be controlled to the maximum allowable level (80 dBA L_{max}) as measured at one meter (3.28 feet) from the source (L_{max} is the maximum noise level during the measurement period). It is noted that the requirements of Mitigation Measure NOI-1 are not currently required under existing conditions and thus certain Special Use Events under the Proposed Project could be less noisy than a similar special event under current conditions.

The commenter states that the goal of the impact analysis should be achieved by considering sound level measurements in terms of "functional effects" (the behavioral, physiological, and ecological consequences of noise) and then goes on to provide examples of functional effects. This comment is noted. However, the standard practice for noise analysis under CEQA does not involve a "functional effects" type of analysis. As detailed on page 3-29 in Section 3.14, Noise, of the Draft SEIR, "Sound is technically described in terms of the loudness (amplitude) and frequency (pitch) of the sound. The decibel (dB) scale is logarithmic, not linear, and therefore sound levels cannot be added or subtracted through ordinary arithmetic. Two sound levels 10 dB apart differ in acoustic energy by a factor of 10. When the standard logarithmic decibel is A-weighted (dBA), an increase of 10 dBA is generally perceived as a doubling in loudness. For example, a 70 dBA sound is half as loud as an 80 dBA sound and twice as loud as a 60 dBA sound. When two identical sources are each producing sound of the same loudness, the resulting sound level at a given distance would be three dB higher than one source under the same conditions (Federal Transit Administration [FTA] 2018). For example, a 65 dB source of sound, such as a truck, when joined by another 65 dB source results in a sound amplitude of 68 dB, not 130 dB (i.e., doubling the source strength increases the sound pressure by three dB). Under the decibel scale, three sources of equal loudness together would produce an increase of five dB." Please refer to Section 3.14.1 for additional details

regarding how the noise analysis was conducted for the Proposed Project. No further response is required.

The commenter goes on to state that the modeling “still raises significant decibel numbers and that “The noise generated from amplified sound sourced from next to the house in the GARDENS will generate high 60 dBA to 70 dBA at some homes on multiple occasions, which the modeling does not quantify in functional terms.” The commenter is correct that the noise analysis conducted for the Proposed Project does not quantify noise in functional terms. Please see the response in the paragraph directly above. Please also refer to Section 3.14.1 of the Draft SEIR for additional details regarding how the noise analysis was conducted for the Proposed Project.

Please refer to Master Responses 4 and 5.

Response to Comment 89-36:

This comment is regarding the noise mitigation in the Draft SEIR. This comment is noted. Please refer to Response to Comments 89-35. There are numerous options available for controlling the noise output of speakers. These mechanisms could vary based on the event, equipment available, feasibility, as well as numerous other options. The County of Los Angeles Department of Parks and Recreation is responsible for Mitigation Measure NOI-1 detailed in Section 5.0, *Mitigation Monitoring and Reporting Program*, of this Final SEIR.

Mitigation Measure NOI-1 limits the maximum output noise level of amplified music to 80 decibels L_{max} as measured at three feet from the source as this is the output noise level that ensures the noise generated onsite attenuates to acceptable levels at the surrounding residences. The commenter posed the question as to why 60 decibels was not imposed as the output noise limit. 60 decibels is a low noise level. According to the California Department of Transportation, normal indoor speech (not amplified) is around 65 to 70 dBA. Thus, a maximum output noise level of 60 decibels is impractical. Additionally, as noted in the Draft SEIR, the level of noise produced during an individual Special Use Event is not proposed to change compared to current conditions. Therefore, noise generated at the Project Site during a Special Use Event with implementation of the Proposed Project would be similar to what could currently occur during a Special Use Event. Furthermore, the requirements of Mitigation Measure NOI-1 are not currently required under existing conditions and thus certain Special Use Events under the Proposed Project could be less noisy than a similar Special Use Event under current conditions.

Response to Comment 89-37:

This comment is regarding special events attendance. The comment refers to the Gardens’ website (for which the information, per the commenter, is no longer posted online) and potential attendance information posted on that website. Please refer to Response to Comments 89-21. This comment is noted. No further response is required.

This comment also refers to Section 21151(b)(2)(B) of CEQA. The Section number cited in this comment is not correct. It is anticipated that the commenter is referring to CEQA Section 21157(b)(2)(B) which states: “The maximum and minimum intensity of any anticipated subsequent project, such as the number of

residences in a residential development, and, with regard to a public works facility, its anticipated capacity and service area." This citation from CEQA is for a "Master Environmental Impact Report." However, it should be noted that a "Supplemental Environmental Impact Report" (not a Master Environmental Impact Report) was prepared for the Proposed Project. Therefore, the commenter's citation regarding a Master Environmental Impact Report does in fact not apply to the Proposed Project. This comment is noted. No further response is required.

This comment also mentions the number of persons who would attend a special event. The comment states that in the past the Gardens "may have sold only 350 tickets to a fundraising event does not set the upper limit for any current review analysis." However, as stated in the Draft SEIR on page 3-62, "Special Use Event attendance is typically 350 persons. Special Use Event parking management is based on the total number of guests expected. All Special Use Events currently require a parking/transportation plan to be submitted to and approved by the City of Beverly Hills." Therefore, since the parking management plan is based on the total number of guests expected if there were to be guests in excess of 350 persons, the parking management plan would reflect that accordingly and the City of Beverly Hills would need to approve the parking management plan. Additionally, per page 3-58 of the Draft SEIR, the number of Special Use Events on the Project Site would increase from 4 to 24 annually; however, the number of allowed attendees per event would not increase from current attendees at Special Use Events. This comment is noted and no further response is required.

Response to Comment 89-38:

This comment is regarding event attendance at the Gardens and the Project's proposal (per page 2-5 of the DSEIR) for the Project to have, in addition to the existing types of events currently held, "proposed adding private and family ceremonies such as weddings." As stated in Response to Comment 89-37, per page 3-58 of the Draft SEIR, the number of Special Use Events on the Project Site would increase from 4 to 24 annually; however, the number of allowed attendees per event would not increase from current attendees at Special Use Events. Additionally, on page 2-6 of the Draft SEIR, it states that for the Proposed Project "Up to 24 Special Use Events per year; up to 4 events per month. Tickets would be sold to regulate the number of visitors to ensure safety and a quality experience." This comment is noted. No further response is required.

Response to Comment 89-39:

This comment is regarding the Beverly Hills Fire Department. This comment suggests mitigation measures. This comment is noted. Please refer to Response to Comment 89-28 and Master Responses 6 and 7. No further response is required.

Response to Comment 89-40:

This comment is regarding the following statement on page 3-59 of the Draft SEIR: "The Gardens provides extensive educational programs for Title I schools and students; an outdoor classroom for hosting lectures on climate appropriate plants, green waste issues, and gardening techniques for the local residents; and a venue for historical lectures and book clubs. Furthermore, the Gardens provides a park space for family

events such as birthdays and special occasions.” This comment goes on to state that such programs represent one of the smallest efforts of the Gardens. The comment references past activities of the Gardens as documented in online archives of its website regarding photographs for the Title I program. The comment goes on to describe the content of the Garden’s website regarding education programs. This comment regarding the content of the Garden’s website has no nexus to the environmental analysis in the Draft SEIR. This comment is noted. No further response is required.

This comment also goes on to state that the Bequest does not specify use of the property as “park” space and that “The Gardens is not a park and the suggestions in the Draft SEIR that the Gardens should be managed the same way as other County parks is a disservice to the Robinson Bequest...” This comment is noted. Please refer to Master Response 8.

This comment also references reported events at the Gardens from the Gardens’ website archives and the subjects of recent and past lectures/book clubs. This comment regarding the content of the Garden’s website has no nexus to the environmental analysis in the Draft SEIR. This comment is noted. No further response is required.

Response to Comment 89-41:

This comment is regarding the operational changes associated with the Proposed Project. This comment speculates regarding the total potential visitors to the Project Site on an annual basis and states that the Project Site was not designed to accommodate the self-estimated 100,000 visitors annually. This comment is noted.

This comment goes on to express concerns regarding parking. Please refer to Response to Comment 89-16 and Master Responses 1, 2, and 3.

This comment states that “The real goal should be that every visitor who comes to the GARDENS walks away with a greater appreciation of the environment.” This comment is noted.

The comment also states the opinion that “When the DSEIR concludes in 3.17.4 that ‘a beneficial impact would occur,’ it speaks only to attendance numbers and not to botanical preservation or a quality visitor experience.” Section 3.17.5 (not Section 3.17.4 as stated in this comment) on page 3-60 of the Recreation section of Draft SEIR states “A beneficial impact would occur.” No further response is required.

Response to Comment 89-42:

This comment is regarding the statement in the Draft SEIR on page 3-70 in Section 3.18, Transportation, which states that “The Proposed Project’s impact to local roadways (Elden Way) would be significant and unavoidable.” Page 3-70 of the Draft SEIR states: “Feasible physical improvements for the local roadway volume impact on Elden Way were not identified, nor were feasible project mitigation measures identified that would reduce the number of Project trips to a level where the local impact is not significant... The Proposed Project’s impact to local roadways (Elden Way) would be significant and unavoidable.” This comment states that “The traffic and parking issue is even more significant and unavoidable than this single sentence reveals” and then goes on to list reasons. This comment is noted. Under CEQA the highest

degree of impact is “significant and unavoidable”, as there are no gradients or degrees of severity once an impact has been found to be significant and unavoidable.

This comment goes on to state that 100,000 visitors would be added annually and that there has been no accounting for street parking restrictions, no Uber/Lyft drop-off/pick-up staging area, no defined offsite parking and no meaningful mass transit (bus) service, as well as no guaranteed permit valet parking. Please refer to Response to Comment 89-16.

Response to Comment 89-43:

The commenter provides background information regarding the drought in California and watering restrictions in the City of Beverly Hills.

As outlined in Section 3.11 *Hydrology and Water Quality* on page 3-24, “The Gardens participates in the City of Beverly Hills’ Water Wise program.” Further, as described in Section 3.20.3.1, *Water Service*, “The Gardens incorporates various features to reduce water demand on site. Water-wise, Mediterranean shrubs, grasses, and groundcovers complement the architectural theme and also reduce overall water use in the landscape. An automatic irrigation system with low volume equipment minimizes water loss due to run-off. Groundcovers and bark mulch help conserve water, lower the soil temperature, and reduce evapotranspiration. Water usage is also continuously monitored. The Proposed Project would comply with the Water Shortage Contingency Plan outlined in the Beverly Hills 2020 UWMP, if implemented. For example, limits may be applied to the number of days, frequency, and duration of outdoor watering.” The Draft SEIR then continues on page 3-75 to say, “The Gardens’ water demand would be accommodated through the City’s existing entitlements with MWD and would not require new or expanded water treatment facilities.”

The commenter describes fire incidents that were not outlined in the Draft SEIR. The commenter also states that “the DSEIR should prominently state that the GARDENS resides in a Wildfire Designated Hazard Area.” The County recognizes that the Project Site is located within a Very High Fire Hazard Severity Zone, according to the California Department of Forestry and Fire Protection. Indeed, the fire designation is explicitly mentioned in Section 3.21 *Wildfire* on page 3-77 of the Draft SEIR. While these specific wildfires were not referenced in the Draft SEIR, their inclusion would not change the Draft SEIR’s conclusion of less-than-significant impacts. Project impacts related to wildfire are discussed in Section 3.10, *Hazards and Hazardous Materials*, beginning on page 3-21 of the Draft SEIR and Section 3.21, *Wildfire*, beginning on page 3-77 of the Draft SEIR. Please refer to Master Response 6 and Master Response 7.

The commenter requests that the Garden close on any declared red flag day for the Beverly Hills area. This comment is noted.

Response to Comment 89-44:

The commenter states that the Draft SEIR does not make clear how the County can separate funding from the Friends for just public purposes from their private uses. The commenter speculates that the proposed operational changes will violate the Bequest unless the Special Use Events relate to using the Gardens as a

botanical facility or an arboretum. This comment does not raise a specific environmental issue. However, it should be noted that it is within the purview of the County of Los Angeles to make a request to change the operational characteristics of the Virginia Robinson Gardens, which is the issue at hand. To do so, the County is requesting a discretionary action—an amendment to the existing operating Agreement between the County and Friends of Virginia Robinson Gardens. By way of discretionary action, the Los Angeles County Board of Supervisors will authorize the Director of the Department of Parks and Recreation to enter into an amended Support Agreement with the Friends of Robinson Gardens to reflect the operational changes approved by the Board. Formally, this amendment would consist of revising Section 4.05 of the Agreement to reflect the proposed changes to the operation of Virginia Robinson Gardens approved by the Board of Supervisors. All comments will be provided to decision-makers prior to consideration of the Proposed Project. Please refer Master Response 8.

Response to Comment 89-45:

The commenter claims that the Draft SEIR “dismisses” the No Project alternative “even though the DSEIR acknowledges it fully mitigates all impacts.” The commenter speculates that “the No Project Alternative is compelling in terms of meeting the policy objectives of the County.” However, as outlined in *Table 4-3. Comparison of Project Objectives by Alternative*, the No Project alternative would only meet one of the six Project objectives. Further, the No Project alternative would not eliminate the previously identified significant unmitigable impact associated with Saturday traffic on Elden Way from the 2014 SEIR. This comment is noted.

Proposed Days of Operation: Every Sunday

The commenter speculates that the Gardens will not have sufficient volunteers on Sundays to give tours and staff events. These comments are not direct comments on the content or adequacy of the Draft SEIR and do not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Operating Hours: Open Daily to Sunset

It is the commenter’s opinion that sunset hours “do not offer a unique experience” at the Gardens and the current hours support the “preferred experience.” These comments are not direct comments on the content or adequacy of the Draft SEIR and do not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Increasing Attendance

The commenter states that Virginia Robinson Gardens should remain closed on Sundays, suggesting that increased operational hours will not expand public access. The commenter suggests that the County should instead focus on marketing efforts. As set out on Draft SEIR page 2-5, one of the Project Objectives is to expand the daily operating hours, and increasing the number of days per week that the project site is open to the public. As such, reducing the number of daily (and weekly) hours or retaining the existing schedule would not meet the Project Objectives. Further, on Draft SEIR page 2-6, it is explained that the

proposed changes to the operating hours are to allow the County to meet the one of the primary goals of the Virginia Robinson Gardens by increasing public access. These comments are not direct comments on the content or adequacy of the Draft SEIR and do not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Traffic and Parking

The commenter speculates that the current attendance limit offers the “correct balance” between what the Gardens can support in terms of parking and what street parking can tolerate on a daily basis. These comments are not direct comments on the content or adequacy of the Draft SEIR and do not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Inclusivity and Equity

The commenter surmises that basic program changes can enhance equity and inclusivity without operational changes. The commenter also requests that the Gardens operate on a “no wedding reception basis.” These comments are not direct comments on the content or adequacy of the Draft SEIR and do not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Educational Center

The commenter believes that the Title I education program and after-school program can be expanded within current hours of operation. These comments are not direct comments on the content or adequacy of the Draft SEIR and do not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Special Events

This comment asks whether there is a lack of any standard for the exercise of the Superintendent’s discretion in determining Special Use Event topics. This comment does not raise any issues regarding the content or adequacy of the environmental analysis in the Draft SEIR for the Proposed Project and does not raise a specific environmental issue. This comment is noted.

The commenter continues on to question why Virginia Robinson Gardens (and presumably the Friends of Robinson Gardens) could not host their fundraisers off-site at private restaurants or theaters, as other charities do. This question reflects an opinion of the commenter that this should take place however, this is not relevant to the CEQA analysis prepared for the Proposed Project. This is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue; no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Response to Comment 89-46:

The commenter provides a list of seven (7) Project alternatives that were not analyzed in the Draft SEIR, stating that “all of these alternatives merit analysis and discussion for the County to make a decision on a prudent course of conduct.”

As described in Section 4.1 *Alternatives to the Proposed Project* on page 4-1 of the Draft SEIR, an EIR shall describe a range of reasonable alternatives to the Project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives (CEQA Guidelines Section 15126.6[a]). The Draft SEIR included a No Project Alternative and a Reduced Daily Visitor Alternative. It is important to note that the Reduced Daily Visitor Alternative was identified as the environmentally superior alternative because no other alternatives were identified that would substantially reduce or eliminate significant adverse traffic impacts or would meet the project objectives when compared to the Proposed Project. In addition, the Reduced Daily Visitor Alternative would result in beneficial impacts to recreation and meet all of the project objectives.

Furthermore, the whole of the record includes the 1980 EIR in combination with the 2014 SEIR and this SEIR. Accordingly, alternatives to the Proposed Project analyzed in the 1980 EIR and 2014 SEIR were analyzed which propagates the record for the required Alternatives analysis. The 1980 EIR included three (3) Project alternatives: 1) No Project Alternative, 2) Reduced Scope, and 3) The Use of an Alternative Design or Site. The No Project Alternative discussion included: 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. These alternatives were determined to be infeasible.

This comment is noted.

Response to Comment 89-47:

This comment claims that the cumulative impact assessment does not account for events that may take place at the nearby Beverly Hills Hotel, Greystone Manor, Beverly Hills Women’s Club, or private homes within the neighborhood. In compliance with CEQA, cumulative impacts are addressed in the Draft SEIR (specifically Section 5.1 beginning on page 5-1 of Draft SEIR). To analyze the cumulative impacts of the Project in combination with existing development and other expected future growth, the amount and location of growth expected to occur (in addition to the Proposed Project) must be considered. As stated in CEQA Guidelines Section 15130(b), this reasonably foreseeable growth may be based on either of the following, or a combination thereof:

- A list of past, present, and reasonably anticipated future projects producing related or cumulative impacts, including those projects outside the control of the agency
- A summary of projections contained in an adopted general plan or related planning document which is designed to evaluate regional or area wide conditions

The cumulative impact analysis took into consideration the listed projects combined with land use conditions. The Project Site is located in a fully developed area of the City of Beverly Hills in a stable, single-family residential area. While demolition and replacement of estates (or construction on an existing estate) in this area of Beverly Hills is common, these practices do not substantially change the established residential nature of the area. Development in the area is considered to be stable and would be limited to infill or replacement projects that would not significantly alter land uses in the area.

The Proposed Project includes minor changes to the operational characteristics of the Project Site and would not substantially change or affect surrounding properties, nor would it conflict with other localized residential construction.

Response to Comment 89-48:

This comment summarizes the concerns in the comment letter. This comment is noted. Please refer to Response to Comments 89-1 through 89-47.

Letter 90a - Debbie Weiss, September 2, 2022

Dear Ms Chien,

I am a legislative advocate working on behalf of Kathy Checchi.

I am also a resident activist who fought for many years to protect my home in the hillside of Beverly Hills, as well as the whole hillside area from overdevelopment.

The proposed expansion, the expansion requests, and the manner by which the County analyzes and presents data seem very one-sided data and minimize or dismiss the neighbors' concerns.

While this behavior might be expected of a developer, it is not what one should be expecting from what is supposed to be an open, balanced governmental process.

All of Ms Checchi's group of 35 nearby neighbors live in the immediate area, on 11 different streets, and some are Friends of the Gardens. Ms Checchi and her neighbors agree that the Gardens are a wonderful resource, and that the Friends charitable work is valuable. But they do not support the commercial aspects of the Gardens, and they certainly do not support the expansion of such commercial activities.

They moved into a residential neighborhood, not a commercial one.

There is strong evidence to support that the majority of the programs currently being run out of the Gardens has very little to do with education and are instead county club like activities which are often private members only, and and/or charge quite a bit (in excess of \$100) to attend.

Research by neighbors uncovered:

- Per Charity Navigator, based on available IRS 990 forms, the Friends spend about 1/3 of the money they raise on "administration costs."
- Of the program expenses, the Friends only spent 5% on education which included not just school education, but public education and education of the Friends.
- School Education is the smallest portion of Gardens activities per anecdotal reports from Garden docents.
- The Gardens are closed to the public for the months of May and September
- The educational access for children is dwarfed by the number of country club type of events held.
- There have been multiple events selling items such as high-end jewelry and perfume, and a plethora of private member only parties.

There is quite strong evidence that the current activities of the Gardens are in violation of the terms of the Grant Deed, and are also in violation of the 2014 terms, much less the proposed expansion.

The majority of the letters and speeches in support of the expansion parroted the bullet points of the Gardens email without much analysis. I think this gives a false picture of support. Many of the supporters talked about the increased public access without seeming to know the current situation.

I am also concerned that the Gardens call to action emails that spurred many of these letters contained information that was misleading. For example, comparing the Gardens to Descanso Gardens which is 25 times larger, where weddings could be located well away from any nearby neighbors, is simply not a like

90a-1

90a-2

90a-3

for like comparison. And the email also fails to inform the public about the correct terms of the 2014 agreement, mention the claims of the violation of the terms of the Grant Deeds and the other points mentioned above.

For example, in the City Council hearing, one of the Friends was asked specific questions about the financing, and she claimed she didn't have it to hand, and abruptly ended her speech.

I wonder how many of the supporters live in the immediate area. It feels very unjust that people not impacted by these changes might be able to impose them upon these residents. Would these people want to live next door to a commercial venue? Would they want the increased fire risk to their homes?

Increased access can easily be achieved without any changes to the current operations. The Gardens can open for the two months they are closed to the public. The perfume type parties can be eliminated and educational events hosted in their place instead.

Is the "Of the program expenses, the Friends only spent 5% on education which included not just school education, but public education and education of the Friends" correct? The public deserves to know what this percentage is, and this should be a significant talking point during these deliberations.

Please consider this a formal request for this analysis to be presented at the public hearing, and that the Gardens emails it to their supporters so that they receive accurate, balanced information from which to form their opinions.

We may find that if some of these supporters knew how few resources were currently being devoted to the educational aspect, they might have a different point of view.

The nearby residents moved into a residential neighborhood, not a commercial one. If anything, the current Commercial activities should be curtailed, not increased.

We ask that you analyze the data. We ask that you explore other ways to increase access without any of these proposed changes. And we request that in depth studies by independent experts analyze the fire, noise, and other risks to the neighborhood be conducted.

If the concern is the financial viability of the Gardens, educational programs, and public access, and if the City of Beverly Hills is willing to take over the Gardens and solve these issues, then what is stopping the County from returning the Gardens to them?

Yours Sincerely,

Debbie Weiss

90a-3
cont.

Responses to Letter 90a – Debbie Weiss

Response to Comment 90a-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues. The commenter provides introductory material and states that the Draft SEIR seems “very one-sided data and minimize or dismiss the neighbors’ concerns.” This comment is noted.

Response to Comment 90a-2:

The commenter provides background information about neighborhood opposition to the Proposed Project, stating that in part that the neighbors “agree that the Gardens are a wonderful resource... But they do not support the commercial aspects of the Gardens, and they certainly do not support the expansion of such commercial activities.” The commenter provides a bulleted list of information provided by the neighbors and speculates that the Gardens are in violation of Mrs. Robinson’s Grant Deed.

This comment does not raise a specific environmental issue. However, it should be noted that it is within the purview of the County of Los Angeles to make a request to change the operational characteristics of the Virginia Robinson Gardens, which is the issue at hand. To do so, the County is requesting a discretionary action—an amendment to the existing operating Agreement between the County and Friends of Virginia Robinson Gardens. By way of discretionary action, the Los Angeles County Board of Supervisors will authorize the Director of the Department of Parks and Recreation to enter into an amended Support Agreement with the Friends of Robinson Gardens to reflect the operational changes approved by the Board. Formally, this amendment would consist of revising Section 4.05 of the Agreement to reflect the proposed changes to the operation of Virginia Robinson Gardens approved by the Board of Supervisors. Furthermore, a financial analysis is not a requirement of CEQA. All comments will be provided to decision-makers prior to consideration of the Proposed Project.

Response to Comment 90a-3:

The commenter requests that the County explore other ways to increase access the proposed changes and conduct in-depth studies by independent experts analyze the fire, noise, and other risks. The environmental impacts of the Proposed Project have been analyzed in full as part of the Draft SEIR and technical studies. This comment is noted.

The commenter requests that the County disclose expenses for educational programs. This comment is noted.

The remaining comments are not direct comments on the content or adequacy of the Draft SEIR and do not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 90b - Debbie Weiss - September 2, 2022

Dear Ms. Chien,

I reviewed the Grant Deed and the 2014 agreement and compared them to what I saw on the Virginia Gardens website (<https://www.robinsongardens.org>). There are many instances of commercialization and other use violations.

It is my position that the recent uses for the Gardens do not abide by the stipulations made in the Grant Deed or the 2014 agreement. In fact, it appears that the 2014 Agreement allows for uses in contradiction to the Grant Deed.

For example, the 2014 agreement allows for commercial filming, yet in the Grant Deed Pg 2 #4 *"no business for profit should ever be conducted on said property."*

If you look through the website, and the monthly newsletters tab from January 2021- November 2021, some themes emerge.

- 1- Very little attention is given to the underserved children component of the Gardens. I could only find one picture
- 2- A plethora of pictures are available of fancy luncheons, book clubs, and other such events referencing very high-end food, champagne, etc. in a very product placement type manner
- 3- Numerous mentions of vendors and the selling of items. Including a very telling quote of an "unexpected donation" from the proceeds of an on-site book signing.
- 4- The Gardens were to be for the *"benefit and enjoyment of the general public as an arboretum garden"* (Grant Deed #4). There are multiple references to private, member only events.

90b-1

The Gardens does offer educational opportunities to children- the site mentioned serving 2000 children a year- or 20 days worth if you factor in their max attendance of 100 per day, and did offer a remote program that seemed to serve 3000-4000 children. What happens the other 345 days a year?

However, this is dwarfed by what appears to be essentially a country club for the benefit of the Friends and their friends. There are numerous events that appear to have nothing to do with the terms of the Grant Deed nor the 2014 agreement. And the website routinely promotes high end designers, restaurants, jewelry vendors, perfume vendors, etc. There are a large amount of references to high end food such as Spagos, Cartier champagne, etc. The site is awash with photos that look as if they are taken from high society magazines.

Children Education

Tours are limited to Monday – Friday 10 am – 12:30 pm and the website says they served 2000 children this way. They also started a remote program that is said to have served 3000-4000 students.

They appear to have one annual Science Fair in the spring.

Please note the limited times here of 2 ½ hours during weekdays, versus the virtually wide-open calendar for the wide-ranging events the Friends attend.

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Children's Onsite Program

Virginia Robinson Gardens (listed on the National Register of Historic Places) offers a fun, interactive science-based learning experience for elementary school students, grades 3-5. Children will learn by finding, identifying, tasting and smelling plants they discover in one of our six botanical gardens. They will then have an opportunity to examine these plant species under a microscope and learn how to cultivate and nurture these plants in a garden of their very own.

Our program complements the California State guidelines for science education, and field trips to the Robinson Gardens have been approved by the Los Angeles Unified School District. The goal of the program is to increase children's knowledge about botany, ecology and conservation, as well as motivate kids to eat healthier foods by teaching them where their food comes from and how it's grown in nature.

Student field trips are led by trained docents who are able to foster a child's curiosity and are able to provide an exciting, exploratory learning experience. We are able to accommodate up to 42 students with 4 adult chaperones. Tours are offered Monday through Friday from 10:00AM to 12:30PM with an advanced reservation. Admission is free for qualified private and public schools and transportation is available for qualifying Title 1 schools. The tour concludes with a souvenir for each student; a gift bag and a seedling that they will have planted.

Advance reservations are required for all field trips (we commonly book a school-year ahead). If you are interested in having your child's class visit Virginia Robinson Gardens, please have your school contact April Walton at awalton@parks.lacounty.gov or 310-550-2040.

Due to COVID-19, on-site school programs are currently pending.

- Virginia Robinson Gardens is listed as an approved field trip for the Los Angeles Unified School District for grades 3-5.
- Admission is free for qualified private and public school organized field trips.
- Transportation is available, and free if school qualifies as Title 1.
- Advanced reservations are necessary with a short application to complete.
- Docent led tours for children are available throughout the year.
- Tours are offered Monday through Friday from 10:30am to 12:30pm.

Following Virginia Robinson's legacy of serving children of the community, the Friends had a Children's Science Program, bringing over 2,000 schoolchildren from the 2nd to the 4th grades to the Gardens for docent-led children's science tours each year. These tours covered topics such as photosynthesis, pollination, composting, the difference between fruits and vegetables, and many more science-based topics.

4

90b-1
cont.

The Children's Science Fair



Our annual, spring Science Fair brings young people from local residential treatment programs to the gardens for a fun day of exploration and learning. It is a day that celebrates the earth and demonstrates support for environmental awareness through discussions on water conservation, recycling, saving energy and food sources. The children, ages 6-16, tour the grounds, venturing into the gourmet garden and visiting the chickens in our very own Poulet Palace. They take a stroll down to the Wildlife Pond and journey through the largest collection of King Palms in North America. All the while, they are learning about the environment and their part in protecting the earth and making it a better place.

Following the tour, the kids are invited to a healthy lunch and a Science Show. As they depart, each child is given a backpack full of school supplies and will leave with a skip in their step having spent the day surrounded by nature.

For more information about the annual Children's Science Fair, please contact April Walton (310) 550-2087 or awalton@parks.lacounty.gov

Special Events

While some events may be in line with the 2014 agreement, they certainly do not appear to be in line with the Grant Deed. And despite being closed to the public for May and September, the Friends have events during these months for themselves, also in violation of the terms of the Grant Deed dictating that the Gardens be open to the Public. In the monthly spotlights, they interview a different member each month- few mention the children educational aspect, many mention the fabulous parties. Also, some events are for "members only" – i.e., not open the public.

From the Grant Deed

Pg 2. #1

"the said property...shall be held and used...for the purpose of an arboretum or botanic garden and for no other purpose inconsistent with said use"

2014 Agreement- classes are supposed to be about *"how well they interpret the historical collections at the facility"*

4.05.04 Type of Events

Public programs to conform to new day/hours and number of participants allowed; however, subject matter for seminar/classes to be determined at the discretion of the Superintendent based on how well the classes interpret the historical collections at the facility. Also to include tours of the grounds for biology, botany, and horticulture groups.

Some examples from their website:

"Educational" Events

- High end art collecting "how to invest wisely in art"

Mumsey Nemiroff Discusses Fakes, Frauds and Forgeries in the Art World at the Virginia Robinson Gardens



The Virginia Robinson Gardens played host this past month to an intimate salon featuring guest speaker Mumsey Nemiroff. An experienced lecturer, having taught at UCLA for two decades on the subject of art connoisseurship, Mumsey recently spent a particularly gonggous November morning illuminating just over two dozen Friends and their friends about the art of collecting.

"Understand what you're buying," she advises. "Buyer beware, always."

In spotting a fake, Mumsey has identified six criteria to help collectors successfully procure genuine art: age, condition, rarity, aesthetic, provenance, and price. "Always beware of the words unique and rare," she cautions.

[...Read More](#)

90b-1
cont.

But at the center of the event was how to wisely invest one's money in art. And for those in attendance, including President Betty Goldstein and past Presidents Kerstin Royce and Patti Reinstein, Mumsey's talk proved incredibly informative about what to look for when purchasing genuine art and antiques.

- **Gingerbread House Decorating**

Participants were provided with a gorgeous, pre-assembled gingerbread house made by local bakery Tutto Bene; royal icing; figurines of trees, sleighs, Santa, snowmen, and more for their gingerbread house gardens; and deluxe candy kits (based on their pre-reserved color palette). The heart of the event was the hour-long decorating lesson by Della Gossett, Spago's Executive Pastry Chef. Everything from her tutorial on piping the royal icing (which dries faster than you can believe) to best practices for applying the candy, gave guests professional insight into making a great house. Additionally, Chef Della interspersed fun gingerbread house trivia (did you know Queen Victoria's wedding cake used royal icing which set a new standard for wedding cakes, and weighed over 300 pounds?!). Della truly was an excellent teacher and made the morning very special.

- **Art classes taught by world famous artists**

4. Please add any additional information you would like to share!

For me, the greatest gift from the Gardens is the opportunity to study botanical illustration. I knew nothing about it but found that it was taught in such a way that even your first piece was pleasant to look at -- not botanically correct, but pretty. Well, now after only 14 years or so, I am starting to feel somewhat capable of producing something decent. I encourage anyone who would like to try it to join one of our classes taught by famous artists from all over the world and see what you can do! You might be as surprised as I was!

- **Learn about Restaurants**

Eloquent and dapper as ever, Geary, the former pastry chef and best-selling author, charmed us during his second engagement at the Gardens by helping us to remember those restaurants that formed our first experiences as children and the ones that became our favorite haunts in our adult years. We learned about the origins of legendary Southern California restaurants, which ones have survived and how they have changed with the times. There were a bevy of questions, a clear indication of a successful talk and an enraptured audience.

Private Events

Despite the Grant Deed stipulating that the Gardens be accessible by the public, there are numerous "member only" events.

Pg 2 #4

"shall at all reasonable times be open and available for the benefit and enjoyment of the general public as an abortetum garden"

Our new book club, Tea, Scones & Reading Group, has had its first meeting at the Gardens. The book club is open to new members and will be held quarterly. Announcements will be sent in plenty of time for you to read the book. Books are chosen with relevance to the Robinson family and their estate.

90b-1
cont.

**Proposed Operational Changes at the
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schools. Garden Tour co-chair Jeanne Anderson talked about the upcoming, not to be missed, very special members-only Garden Tour on October 23. Education chair Clare Wagner spoke about some very exciting events and lectures, including an upcoming presentation by interior designer extraordinaire Timothy Corrigan. Membership chair Natalie Gordon mentioned the annual Gingerbread House Decorating event that her committee sponsors and talked about opportunities to volunteer for her committee as did the Newsletter editor Linda Meadows.



90b-1
cont.

Not Open to the Public

The website states that the Gardens are closed to the public for the months of May and September, but they are allowing private member events to occur during those times.

Book Club event from September 2021

We would love for you to join us for our Education Lecture Series and our book club. The book club is open to a small number of guests; please contact the office if you are interested in attending. Because of limited space for our lecture series, we invite our membership to attend, so please consider becoming a [Society Member](#).

Commercial Uses have been Occurring

Multiple references to vendors, boutiques and items “available for purchase”. Not all of the proceeds go to the Garden. I saw a 20% donation of proceeds referenced as well as the Friends being grateful for the “totally unexpected” donation of all of the proceeds from a book signing. The Friends appear to be allowing commercial activities on the site while taking a “cut”. And they also allow commercial filming to occur onsite for a fee.

From the Grant Deed,

**Proposed Operational Changes at the
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Pg 2 #4 "no business for profit should ever be conducted on said property"

- This appears to have been violated by the October 23, 2021 shopping event where there were numerous vendors and according to the website 20% of the proceeds were donated. I.E., not 100%- the vendors appear to have "conducted business" on the property

Vendor Sales onsite

Wonderfully curated by Dana, the boutiques around the pool and in the Pool Pavilion displayed enticing and popular items for sale from fabulous clothing and jewelry to shoes, colorful tablecloths, and bags. The attendees shopped happily, and 20% of the sale proceeds were donated to the Gardens.

It was Roses, Roses, Roses, in a rainbow of beautiful colors available in bouquets for purchase from Rose Lane Farms. On the tennis court, an enthusiastic group of "gardeners" were having a difficult time deciding which of the rose bushes they wanted to purchase. Also spotlighted was Virginia Robinson's favorite rose -- the beautiful and fragrant pink Eiffel Tower.



How do I become a retail vendor, room designer, or floral designer for your Annual Garden Tour?

The Annual Garden Tour is held every year on the third Saturday in May from 10:00 am to 4:00 pm.

The event showcases five grand private gardens on the Westside in addition to a festive decorated Robinson home located on a six-acre garden oasis in the heart of Beverly Hills. At the fabul Virginia Robinson Gardens, a lovely luncheon is served all day long and local vendors feature their wares in a chic boutique. Mrs. Robinson's historic home is open and decorated by remarkable floral and room designers expressing each year's theme. Guests are invited to enjoy floral design demonstrations, an opportunity drawing, as well as shopping in the unique boutiques made available at the estate that day. Proceeds from the Benefit Garden Tour help preserve the Virginia Robinson Gardens as well as allow the Friends of Robinson Gardens to provide ongoing community education and outreach programs.



Sunday, seated nearby, was busy greeting family and friends, both old and new, and signing copies of her book. Sunday graciously donated the proceeds from the sale of all books purchased at the Tea to the Friends. When asked about her donation, Sunday replied, "I loved the event! And so many people have been contacting me about how much they enjoyed it. I want to donate the proceeds from the sale of the books in gratitude to FRG for giving me such a special and

meaningful event." We are deeply grateful to Sunday for her totally unexpected and very generous donation.

90b-1
cont.

Proposed Operational Changes at the
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Commercial Photoshoots

The Virginia Robinson Gardens & Estate is available for both ~~commercial~~ and non-commercial still photography shoots. Located in the heart of Beverly Hills, this lush, 6.2-acre estate, made up of six diverse gardens and unique, historical architecture, provides a dynamic backdrop to any photoshoot. ~~Commercial~~ and non-commercial photoshoots are available ~~for a scheduled fee~~. Monday through Friday, from 9:00 am to 4:00 pm - including set up and breakdown time.

To inquire about booking a commercial or non-commercial photoshoot, please email visit@robinsongardens.org or call (310) 550-2040.

90b-1
cont.



90b-1
cont.

Already Renting out the Gardens for private events?

The Website says that they cannot host the below:

Can I have my wedding at the Virginia Robinson Gardens?

Unfortunately we are prohibited from hosting weddings, religious events, or political events.

But if that is the case, then what events is this referring to?

Event Prices

Events are priced individually depending upon the number of attendees, the location(s) within Robinson Gardens, the amount of set-up time required for an event, and other factors.

Included in the Event Packages

A limited selection of tables and chairs are available for up to 100 people, linens for up to 50 people, includes 72" round tables that sit 10 people comfortably, white folding chairs, sun umbrellas, use of electrical outlets for lighting and sound, catering kitchen, restroom facilities, and the use of dumpsters on the property.

Limited parking: 25 spaces are available in the parking lot by the Pool Pavilion above that catering and rental companies also need to park in this lot and will reduce the number of spaces available for guest parking. If more than 25 spaces are needed, options are (1) Uber/Lyft/taxi, (2) park on Crescent (a nearby street) and walk up to VHG, or (3) valet parking. Parking on Cedar Way is not allowed due to neighborhood restrictions.

*Caterers must stay throughout the event and be responsible for clean-up after the event.

Conclusion

The Gardens are essentially being used as a country club for the Friends. There are numerous references to donated food and beverages and I wonder if there is a quid pro quo going on for the benefit of the Friends social events in exchange for visibility on the website.

While they do offer educational opportunities for underserved children, this is a small percentage of its use compared to the plethora of fancy luncheons, parties, book clubs, and other social events for the benefit of its members.

It is my position that the uses violate numerous areas of the Grant Deed and that the clause citing the return to the purview of Beverly Hills has been triggered on multiple levels.

90b-1
cont.

Yours sincerely,

Debbie Weiss (on behalf of my client Kathy Checchi)

Responses to Letter 90b – Debbie Weiss

Response to Comment 90b-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues. The commenter provides information from the Gardens website and claims that events are in violation of Mrs. Robinson's Grant Deed. The commenter, therefore, believes the County should relinquish the Gardens to the City of Beverly Hills.

This comment does not raise a specific environmental issue. However, it should be noted that it is within the purview of the County of Los Angeles to make a request to change the operational characteristics of the Virginia Robinson Gardens, which is the issue at hand. To do so, the County is requesting a discretionary action—an amendment to the existing operating Agreement between the County and Friends of Virginia Robinson Gardens. By way of discretionary action, the Los Angeles County Board of Supervisors will authorize the Director of the Department of Parks and Recreation to enter into an amended Support Agreement with the Friends of Robinson Gardens to reflect the operational changes approved by the Board. Formally, this amendment would consist of revising Section 4.05 of the Agreement to reflect the proposed changes to the operation of Virginia Robinson Gardens approved by the Board of Supervisors. All comments will be provided to decision-makers prior to consideration of the Proposed Project.

Letter 91 - Liz Kim - September 2, 2022

August 30, 2022

Via Email: jchien@parks.lacounty.gov

Ms. Jui Ing Chien
Park Planner
County of Los Angeles
Department of Parks and Recreation
1000 S. Fremont Ave.
Unit #40 A-9 West, 3rd Floor
Alhambra, California 91083

Re: Comments on Virginia Robinson Garden Expansion Plan

Dear Ms. Chien and to Whom It May Concern:

1. Save the Virginia Robinson Garden from risks of fire and damages by the Private parties and events; and provide us how to prevent such risks and any control plans;
2. Preserve the Virginia Robinson Garden Estate from mass visitors and show how the docent-led programs will be added and performed to ensure the estate is not ruined and damaged;
3. Disclose the Students' educational programs and its historic data and all other programs and activities in order to ensure the Garden has been used properly;
4. Disclose the outreach efforts made to improve the Students' educational programs to benefit more students from L.A. County and especially Title 1 Schools;
5. Show the transparency on the maintenance costs and Friends of Robinson Garden's accounting for donations received and its expenditures;
6. Show reservation tools how the private parties will be booked and managed fairly without making the Estate as an exclusive backyard for some connected people and provide us what makes this expansion a public benefit;
7. Listen to the neighborhoods to their concerns, and provide them how to prevent the issues; and
8. Honor the original donor agreement, and provide us explanation on what makes the L.A. County can break the agreement.

91-1

91-2

91-3

Sincerely,

Liz Kim

1064 S Hayworth Ave, Los Angeles, 90035

Name

Address

Responses to Letter 91 – Liz Kim

Response to Comment 91-1:

Please refer to Response to Comment 83-1. This comment is noted.

Response to Comment 91-2:

Please refer to Response to Comment 83-2. This comment is noted.

Response to Comment 91-3:

Please refer to Response to Comment 83-3. This comment is noted.

Letter 92 - Kathy and Al Checchi, Roxanne Heptner, Jodi and Don Stine, Michael and Michelle Weiner, Michael McAllister

Jui Ing Chien

Park Planner, Department of Parks and Recreation

By email jchien@parks.lacounty.gov

We believe there are many deficiencies in the Draft Supplemental Environmental Impact Report (DSEIR), including traffic, parking, water, safety, but the purpose of this letter is to alert the City to one huge deficiency – the discussion of Fire Hazards and Emergency response.

FIRES

The neighborhood around the Virginia Robinson Gardens (the Gardens) has recently been declared an Extreme Fire Hazard Area, and many residents of the area had their home and property insurance raised significantly or canceled completely.

Yet, the Draft SEIR glosses over this important issue. Specifically, the DSEIR states:

“3.21.1 There has not been a wildland fire of any significance in Beverly Hills, and the last large wildland fire adjacent to the city occurred in Franklin Canyon more than 50 years ago”

This is completely inaccurate.

The DSEIR fails to discuss the Bel-Air Fire of 1961. Bel Air is just a few miles west of Beverly Hills. The Bel Air Fire was a disaster that began as a construction debris fire on November 6, 1961 in the Bel Air Community of Los Angeles. The fire destroyed 484 homes and burned 6,090 acres. At least 200 firemen were injured. This fire moved so quickly and burned so out of control that children were at The John Thomas Dye school that day and then evacuated by noon. By that evening, The John Thomas Dye School had burned to the ground. Much of the difficulty in fighting that fire came from the narrow streets and limited access in Bel Air.

The DSEIR also fails to discuss the Getty Fire of 2019 which burned 745 acres in Los Angeles. Thousands of people were evacuated during this fire and schools were closed. 10 homes were destroyed, and 15 residences were damaged.

On August 15, 2022, a quarter acre fire started at 2040 N. Beverly Dr. (about one mile or less from the Gardens and grew to around one acre. The fire was contained 90 minutes after it started, according to LAFD. The fire was in medium to heavy brush and was burning uphill, authorities said. Some 85 Los Angeles County firefighters responded to the brush fire by ground and air with the help of the Beverly Hills and LA County fire departments, according to LAFD.

Wildfire is a real hazard for Beverly Hills and can't be minimized. The Gardens are particularly prone to fire for several reasons. There is a palm grove and palm trees are notorious for sending embers once ignited. Also, the Gardens have planted an extensive amount of bamboo, which ignites easily. All of this plant material is even more prone to fire hazard with the limitation on watering in the current drought. Most importantly, access to the Gardens is very limited.

92-1

EMERGENCY RESPONSE

The DSEIR failed to discuss the important fact that Beverly Hills Fire Department vehicles (fire trucks, ambulances and rescue vehicles) do not have access to the Garden property. First responders can only access the Garden on foot. A building overhang on the property blocks access to the property by rescue and emergency vehicles. because of the overhang in the parking lot, no fire trucks or emergency vehicles can access the property.

Michael McAlister 1034 and 1036 Cove Way, 1055 Carolyn Way

Note, the six-acre property is undulated, and some areas have limited, uneven pathways compounding an emergency response. This limitation has the potential to delay a critical rescue as well as delay transport to hospital facilities especially when rescue personnel have access limitations.

92-2

The fire risk at the Gardens presents another unique concern. According to the County staff a pressurized fire hydrant exists in the front of the Gardens' grounds. The City Fire Marshall, however, failed to indicate knowledge of this hydrant. In the event of a serious fire, however, additional fire hydrants may be needed. Any backup hydrant would need to extend considerable distances, possibly even from Carolyn Way, Cove, and/or Crescent. The nearest fire hydrant appears to be at 1017 Crescent Drive, a considerable distance from the entrance to the Gardens. This fact will again complicate and delay any response to a fire emergency at the Gardens, perhaps even threaten historic features of the property and potentially spread fire to nearby residences. Any concern for the safety of visitors and staff compels rules and operational procedures which account for the safety limitations of the property. The DSEIR fails to address this critical concern.

SPECIAL EVENTS

Special Events will require set up on the property, since there is no kitchen or catering facilities. The DSEIR also talks about setting up additional lighting and sound systems. Not only will these require many people entering the Gardens to set up and take down, in addition to the attendees at the Special Events, but there is also a known risk that catering facilities, lighting and sound systems malfunction and present a new threat of fire.

During Special Events, cars clog the neighbor streets, blocking many driveways and limiting Emergency vehicles from accessing private homes in the area. If the neighbors have an emergency and call 911, the emergency vehicle may not be able to reach them.

92-3

As residents of Beverly Hills, we believe that the risk of Fire and Emergency is a critical adverse impact which the County DSEIR has completely ignored.

The Final SEIR needs to address the risk of fire by having the Gardens inspected by the BH Fire Department regularly, by limiting the number of events to 4 to avoid fire hazard due to catering, lighting and sound equipment and to close the Garden on high level fire days.

Sincerely,

Kathy and Al Checchi 1007 Cove Way

Roxanne Heptner 1031 Cove Way

Jodi and Don Stine 1024 Cove Way

Michael and Michelle Weiner 1050 Carolyn Way

Michael McAlister 1034 and 1036 Cove Way, 1055 Carolyn Way

**Responses to Letter 92 – Kathy and Al Checchi, Roxanne Heptner, Jodi and Don Stine,
Michael and Michelle Weiner, Michael McAlister**

Response to Comment 92-1:

Please refer to Response to Comment 45c-1. This comment is noted.

Response to Comment 92-2:

Please refer to Response to Comment 45c-2. This comment is noted.

Response to Comment 92-3:

Please refer to Response to Comment 45c-3. This comment is noted.

Letter 93 - Sally Harkham, September 4, 2022

Dear Ms. Chien-

We are writing to bring out some points that were either inaccurate or not discussed in the Draft SEIR.

PARKING, TRAFFIC AND EMERGENCY ACCESS ON OUR STREETS:

Since there are only 35 parking spaces, valet is required for any large event. Nothing in the Draft SEIR discusses what the plan is for parking all the cars which don't fit in the Gardens.

When events have occurred at the Gardens in the past, valet parkers clog our residential streets with parked cars. This makes it impossible for Emergency vehicles to get through to our homes. There are many elderly people who live in the neighborhood. If an Emergency occurs, the residents need to be sure that Emergency vehicles would be able to reach our homes.

Uber and Lyft is not a solution, because that means that the traffic will be increased two fold-one trip for drop off and one trip for pick up. It would also mean that cars will be idling in the cul-de-sac for pickup and delivery.

This is already a problem with the 4 events a year which the Garden currently sponsor. With 24 events it will be unbearable.

We request that you discuss a specific plan for handling all these cars. Specifically, there should be an off-site parking lot and then transfer the attendees by shuttle bus to the Gardens. We also request that the Events be limited to 4.

93-1

FIRE AND EMERGENCIES IN THE GARDENS

The Garden is not equipped to handle fires and emergency situations within the garden itself. There is no access available for emergency vehicles such as ambulances, fire trucks and paramedics. Also, the pathways with the Garden are narrow and uneven.

If the attendees are increased to 200 people a day plus 24 private events a year, this will be a huge problem.

The draft SEIR ignored the risk of fire, but our neighborhood has been declared a High Risk Fire area.

We request that the Final SEIR have an emergency plan which spells out in detail how fire, medical and other emergencies will be handled, including that events will be cancelled on high-risk fire days.

93-2

Thank you,

Sally Harkham

1006 Crescent Drive

Responses to Letter 93 – Sally Harkham

Response to Comment 93-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues. The commenter discusses their concerns about parking for Special Use Events. Parking is discussed in Section 2.2.3, *Special Use Events*, on page 2-4 of the Draft SEIR and Section 2.4.5, *Parking*, beginning on page 3-29 of the Draft SEIR. Parking and traffic impacts associated with the Proposed Project are discussed in Section 4.18, *Transportation*, beginning on page 3-61 of the Draft SEIR. The County has also prepared a site-specific traffic impact assessment for the Proposed Project which is included as Appendix F of the Draft SEIR. Please refer to Master Response 1, Master Response 2, and Master Response 3.

Response to Comment 93-2:

The commenter expresses concern for emergency access to the Project Site. Project impacts related to emergency access are discussed in Section 3.10, *Hazards and Hazardous Materials*, beginning on page 3-21 of the Draft SEIR and Section 3.21, *Wildfire*, beginning on page 3-77 of the Draft SEIR. Please refer to Master Response 6 and Master Response 7.

Letter 94 - Patricia and Armin Wittenberg, September 4, 2022

Patricia & Armin Wittenberg

1065 Carolyn Way
Beverly Hills, CA 90210

Dear Sheila Kuehl and Julie Yom,

Thank you for taking the time to read/listen to us residents' issues regarding proposed changes to Robinsons Gardens.

We, just as many of our neighbors have expressed, are in opposition to the proposed changes for Robinsons Gardens for the same reasons: it would increase unwanted noise, music as well as create traffic, parking, and enforcement problems for the City of Beverly Hills etc.

We have lived here for over 20 years. We assure you, that this is an extremely quiet neighborhood—one of many reasons we chose to purchase a home here. When the annual fundraiser for Robinsons Gardens takes place, we assure you we easily hear loud music and....loud conversation/voices. We are happy to be gracious neighbors to accommodate this important fundraiser.

I might note that one proponent of the proposed changes, made a comment that Virginia Robinson held THREE party events per week. As if that justifies having increased noise and music in our neighborhood in 2021/2022?? That is an irrelevant statement...

The proposal of having up to 24 special events or weddings per year is unacceptable for a few reasons:

--The idea is a commercial enterprise. Did Virginia Robinson allow this?

--Theoretically.....IF these weddings/events were to take place, where does the profit money go to? Does Robinson Gardens have the benefit of the funds? OR...does the profit money go to a Los Angeles County general fund

--Robinsons Gardens is VERY small...only 6 acres. There is truly not enough acreage and foliage to dampen music and voices of events. Sound travels very easily through this neighborhood. The County would be forcing us to listen to wedding/function music that others

94-1

chose? The music could run the range from Italian, Greek, Scottish bagpipers, Rap, to Polka music...etc. This would be an intrusion to the “quiet enjoyment of our property” which we believe residents are legally entitled to.

--The idea of increasing the hours to sunset: we can imagine, if this is instituted, that the next idea would be to have music/concerts on the lawn in the evening. Again...this would be intrusive to the neighborhood.

I have been a member of the Huntington Gardens Art Guild in San Marino for over 10 years (as Parker Wittenberg), and have witnessed their increase in activities held over the years, in filming, music etc. that can increase noise, sound and traffic. One BIG difference they have with Robinsons Gardens—Huntington Gardens has 207 acres of trees, vegetations and buildings to mute music and other sounds on their property. Hence residents in the neighboring houses would hear nothing or next to nothing. They also have a very large parking lot.

To do the noise studies, traffic studies etc, LA County has to spend tax money to do so. We would prefer our tax dollars to be spent on keeping all LA County parks clean, maintained, with outreach as necessary, for the homeless and drug addicted who may also be visiting the park.

The ideal would be to close down the proposed changes to Robinsons Gardens....and do not spend money to do the studies.

Thank you again for your time.

Sincerely,

Patricia Wittenberg

Armin Wittenberg

94-1
cont.

Responses to Letter 94 – Patricia and Armin Wittenberg

Response to Comment 94-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues. This commenter provides anecdotal information and summarizes their opposition to the Proposed Project, primarily due to noise concerns.

Noise impacts from the Proposed Project are discussed in Section 3.14, *Noise*, beginning on page 3-29 of the Draft SEIR. The County has also prepared a site-specific noise impact study, which is included as Appendix E of the Draft SEIR. Please refer to Master Response 4 and Master Response 5.

Letter 95 - Kathy Checchi and Michael McAllister - September 4, 2022

Sent by Email jchien@parks.lacounty.gov

Dear Ms. Chien,

The hours the County is proposing for the Robinson Gardens are **excessive, especially if you consider that the VRG is in a residential area, surrounded on all sides by private homes.**

None of the other Gardens are open until Sunset. Sunset during the summer can be as late as 7:30 or 8 pm and that is when the sun sets. Then there is a period of twilight when it is still light, so people could easily leave later.

Virginia Robinson Gardens

Size	6 acres
Hours	Currently 9-4 Monday-Saturday/ Proposed 9- sunset Every Day
Parking	35 spaces
Surrounding area	completely residential on all sides
Hosted events	Currently 4/ Proposed 24

95-1

To have an event at the VRG, it must be outside and everything needs to be trucked in by delivery trucks- tables, chairs, a tent, cooking facilities, lighting, sound system dance floor and even restrooms, since during the large events, the house is closed. All these trucks must unload in the Elden Way Cul de sac since large trucks don't fit in the driveway of the VRG.

The County compares the VRG to Descanso Gardens but that's not an accurate comparison because Descanso is much larger, has ample free parking and its own food service, multiple indoor facilities, and restrooms.

Descanso Gardens

Size	150 acres
Hours	Mon-Friday 9-7 summer, 9-5 winter

	Sat/Sunday 9-5
Parking	800 spaces
Surrounding Area	Major highway on one border, residential on others
Hosted Events	Yes, but requirement to use the Descanso Café for all catering

The VRG should be compared to similar smaller botanical gardens.

UCLA Mildred E. Mathias Botanical Garden

Size	7.5 acres
Hours	Mon-Fri 8-5, Sat-Sun 9-5
Parking	Paid parking at UCLA parking structure
Surrounding Area	Part of UCLA campus
Hosted Events	None

The Japanese Garden, Sepulveda Basin, Van Nuys

Size	6.5 acres
Hours	Mon-Thurs 10-3:30
Parking	Very limited parking. Website says “come by mass transit”
Surrounding Area	Part of Woodley Park and Rec Center
Hosted Events	Ceremonial Weddings No receptions. Event must complete prior to dusk

The Garden of the World, Thousand Oaks

Size	4.5 acres
Hours	9-5 Tues-Sat. Closed Sun/Mon/Holidays
Parking	Limited site parking
Surrounding Area	Commercial downtown area
Hosted Events	None

95-1
cont.

James Irvine Japanese Garden

Size	Less than an acre
Hours	Tues-Sun 10-5
Parking	2 minute walk- 5 floor parking structure
Surrounding Area	Commercial, Little Tokyo
Hosted Events	Inside at the Japanese American Cultural Center

95-1
cont.

We respectfully submit that the Draft SEIR is inaccurate and incomplete in its comparison of the VRG with Descanso Gardens. It is more accurate to look at Gardens similar to VRG in terms of hours, days open and hosted events.

We also respectfully submit that the Draft SEIR incorrectly analyses the effect of an event at the VRG, since everything needs to be trucked into the VRG- unloaded and reloaded – on City streets, the day before and the day after events, essentially disrupting the neighborhood for 3 days each event. There is no discussion of this at all.

Thank you,

Kathy Checchi -1007 Cove Way

Michael McAllister- 1034,1036 Cove Way, 1055 Carolyn Way

Responses to Letter 95 – Kathy Checchi and Michael McAllister

Response to Comment 95-1:

This comment claims that the Draft SEIR compares the Virginia Robinson Gardens to the Descanso Gardens. However, the Draft SEIR makes no such comparison. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

The commenter further states that the Draft SEIR does not accurately assess the impacts of Special Use Events. Special Use Events are described in Section 2.2.3, *Special Use Events*, beginning on page 2-4. The Draft SEIR analyzed the impacts of these Special Use Events throughout the SEIR as a component of the Proposed Project. This comment is noted.

Letter 96 - Donna Ko - September 4, 2022

August 30, 2022

Via Email: jchien@parks.lacounty.gov

Ms. Jui Ing Chien
Park Planner
County of Los Angeles
Department of Parks and Recreation
1000 S. Fremont Ave.
Unit #40 A-9 West, 3rd Floor
Alhambra, California 91083

Re: Comments on Virginia Robinson Garden Expansion Plan

Dear Ms. Chien and to Whom It May Concern:

1. Save the Virginia Robinson Garden from risks of fire and damages by the Private parties and events; and provide a comprehensive plan to prevent such risks;
2. Preserve the Virginia Robinson Garden Estate from mass visitors and show how the docent-led programs will be added and performed to ensure the estate is not ruined and damaged;
3. Disclose the Students' educational programs and its historic data and all other programs and activities in order to ensure the Garden has been used properly;
4. Disclose the outreach efforts made to improve the students' educational programs to benefit more students from L.A. County and especially Title 1 Schools;
5. Show the transparency on the maintenance costs and Friends of Robinson Garden's accounting for donations received and its expenditures;
6. Show how the private parties will be booked and managed fairly without making the Estate an exclusive backyard for some connected people and provide a rationale for what makes this expansion a public benefit;
7. Listen to the neighborhoods to their concerns, and provide mitigation measures which will protect the neighborhood; and
8. Honor the original donor agreement, and provide an explanation of why L.A. County believes they can break the agreement.

96-1

96-2

96-3

Sincerely,

Donna Ko. 11350 Denair St LA, CA 90049

Name

Address

Responses to Letter 96 – Donna Ko

Response to Comment 96-1:

Please refer to Response to Comment 83-1. This comment is noted.

Response to Comment 96-2:

Please refer to Response to Comment 83-2. This comment is noted.

Response to Comment 96-3:

Please refer to Response to Comment 83-3. This comment is noted.

Letter 97 - Lisa and Russell Stuart - September 5, 2022

By email jchien@parks.lacounty.gov

Dear Ms. Chien,

We are OPPOSED to the changes LA County is proposing for the Virginia Robinsons Gardens.

The changes will adversely impact the Gardens and our neighborhood with:

Noise
Traffic
Parking on the streets
Fire Hazards

The Draft SEIR is inadequate on all these issues.

The special events, which will include Weddings and celebrations, will disturb the quiet of our neighborhood. Presently, we have a very quiet neighborhood and all value our peaceful surroundings.

The Gardens only have 35 parking spaces and there is no plan for parking for the Special Events.

Thank you,

Lisa Stuart & Russell Stuart
258 S. Bedford Dr.
Beverly Hills, CA 90212

Lisa and Russell Stuart

97-1

Sent from my iPad

Responses to Letter 97 – Lisa and Russell Stuart

Response to Comment 97-1:

Thank you for your comment. This commenter states that they are opposed to the Proposed Project due to noise, traffic, parking, and fire hazard concerns.

Noise impacts from the Proposed Project are discussed in Section 3.14, *Noise*, beginning on page 3-29 of the Draft SEIR. The County has also prepared a site-specific noise impact study, which is included as Appendix E of the Draft SEIR. Please refer to Master Response 4 and Master Response 5.

Parking is discussed in Section 2.2.3, *Special Use Events*, on page 2-4 of the Draft SEIR and Section 2.4.5, *Parking*, beginning on page 3-29 of the Draft SEIR. Parking and traffic impacts associated with the Proposed Project are discussed in Section 4.18, *Transportation*, beginning on page 3-61 of the Draft SEIR. The County has also prepared a site-specific traffic impact assessment for the Proposed Project which is included as Appendix F of the Draft SEIR. Please refer to Master Response 1, Master Response 2, and Master Response 3.

Project impacts related to wildfire are specifically discussed in Section 3.10, *Hazards and Hazardous Materials*, beginning on page 3-21 of the Draft SEIR and Section 3.21, *Wildfire*, beginning on page 3-77 of the Draft SEIR. Please refer to Master Response 6 and Master Response 7.

This comment is noted.

Proposed Operational Changes at the
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Letter 98 - Ian Fried - September 5, 2022

From: Sharon Messer
To: Jui Ing Chien
Subject: VRG - Opposition to Proposal
Date: Monday, September 5, 2022 1:57:27 PM

CAUTION: External Email. Proceed Responsibly.

Dear Ms. Chien, I was asked to send this letter to you by a friend who shares our concerns for the Gardens and the neighborhood.

August 30, 2022

Via Email: ichien@parks.lacounty.gov
Ms. Jui Ing Chien
Park Planner
County of Los Angeles
Department of Parks and Recreation
1000 S. Fremont Ave.
Unit #40 A-9 West, 3rd Floor
Alhambra, California 91083

Re: Comments on Virginia Robinson Garden Expansion Plan

Dear Ms. Chien and to Whom It May Concern:

1. Save the Virginia Robinson Garden from risks of fire and damages by the Private parties and events; and provide a comprehensive plan to prevent such risks;
2. Preserve the Virginia Robinson Garden Estate from mass visitors and show how the docent-led programs will be added and performed to ensure the estate is not ruined and damaged;
3. Disclose the Students' educational programs and its historic data and all other programs and activities in order to ensure the Garden has been used properly;
4. Disclose the outreach efforts made to improve the students' educational programs to benefit more students from L.A. County and especially Title I Schools;
5. Show the transparency on the maintenance costs and Friends of Robinson Garden's accounting for donations received and its expenditures;
6. Show how the private parties will be booked and managed fairly without making the Estate an exclusive backyard for some connected people and provide a rationale for what makes this expansion a public benefit;
7. Listen to the neighborhoods to their concerns, and provide mitigation measures which will protect the neighborhood; and
8. Honor the original donor agreement, and provide an explanation of why L.A. County believes they can break the agreement.

98-1

98-2

98-3

Sincerely,

Ian Fried

Name

Address

2909 Bottlebrush Dr.
LA, CA 90077

Responses to Letter 98 – Ian Fried

Response to Comment 98-1:

Please refer to Response to Comment 83-1. This comment is noted.

Response to Comment 98-2:

Please refer to Response to Comment 83-2. This comment is noted.

Response to Comment 98-3:

Please refer to Response to Comment 83-3. This comment is noted.

**Proposed Operational Changes at the
Virginia Robinson Gardens
Final Supplemental Environmental Impact Report**

Letter 99 - Meredith Fried - September 5, 2022

From: Sharon Messer
To: Jui-Ing Chien
Subject: Letter forwarded opposing VRG proposed changes
Date: Monday, September 5, 2022 1:59:16 PM

CAUTION External Email. Proceed Responsibly.

Dear Ms. Chien,

The Friends of the Robinson Gardens have submitted letters on behalf of the VRG and support of the proposed changes. I am opposed to the changes and feel that the comparison that the VRG draws to other Arboretums and Botanical Gardens is not valid.

1. Request to stay open until Sunset: Descanso Gardens is open until 7, South Coast Botanical Garden until 5, LA County Arboretum until 4:30 or 6:30 with shorter hours on the weekend.
2. Size and Facilities: The Descanso Gardens sits on 160 acres with 800 parking spaces and is bordered by a major highway and has a full café and catering on site with a metro train running through it. The VRG sits on 6 acres in a residential section, bordered only by private homes, has no food service available (everything must be brought in), has less than 35 parking spaces, and has no access to public transportation (bus is a 3-4 block walk, and nearest Metro will be Wilshire and Rodeo when completed).
3. The VRG compared themselves to The Wallis and to LACMA which are in a commercial/business zone and have major dedicated parking lots so that no one needs to park on neighboring streets. This is not the case with the VRG as they have gardeners and maintenance staff as well as office and event staff who would be presumable utilizing some of their "claimed" 35 spaces.
4. The VRG claims to need more hours so they can access more students. If the goal is education, then why are school tours only scheduled from 10-12:30 and limited to 42 students? Assuming a tour would be 90 minutes to 2 hours, why can't they do a second or third tour during the day? Schools try to leave a property in time to return students to school. Opening the park on Sundays would not increase the number of children's educational events.
5. The VRG is not a park. Parks are for recreation with hiking trails, walking paths, play equipment for children and dogs are allowed. The VRG is a series of winding paths through the property on uneven terrain and can only be accessed as part of organized tour (by reservation).
6. Special 24 events (up to 4 per month). This places an unreasonable burden on immediate neighbors and those on nearby streets as trucks must be brought in for catering, rentals, flowers, music, etc. The VRG is in the middle of a residential neighborhood with inadequate parking for larger events that require outside staff, valet, etc. Events with as many as one thousand guests would create a huge burden on traffic. Given the large fees for rentals, valet, permits, catering, etc., these special events would appeal only to corporate or wealthy individuals and thus doing nothing to increase inclusivity.

I look forward to seeing these issues addressed in the Final SEIR.

Sincerely,

Meredith Fried

2909 Bottlebrush Dr.
Los Angeles, CA 90077

99-1

99-2

99-3

99-4

99-5

99-6

Responses to Letter 99 – Meredith Fried

Response to Comment 99-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues. This comment references the closing times for other public parks and gardens. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required.

Response to Comment 99-2:

This comment describes the environmental setting for Descanso Gardens in comparison to the Virginia Robinson Gardens. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Response to Comment 99-3:

This comment claims that the Draft SEIR compares the Virginia Robinson Gardens to the Los Angeles County Museum of Art (LACMA) and The Wallis. However, this is inaccurate as the Draft SEIR does not compare the Gardens to any other specific facility, including LACMA or The Wallis. No further response is required.

Response to Comment 99-4:

This comment claims that the proposed operational changes would not increase accessibility to school-age children. Please refer to Master Response 8 and Master Response 10. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required.

Response to Comment 99-5:

Comment noted.

Response to Comment 99-6:

This comment claims that the increase in Special Use Events would place a burden on the neighborhood and would “do nothing to increase inclusivity.” As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 100 - Adam Checchi - September 5, 2022

From: [Adam Checchi](#)
To: [Jui Ing Chien](#)
Subject: Virginia Robinson Gardens
Date: Monday, September 5, 2022 6:12:17 PM

CAUTION: External Email. Proceed Responsibly.

Dear Ms. Chien-

My parents live in the neighborhood of the Virginia Robinson Gardens. I know this neighborhood well, because I grew up in this house and still spend a lot of time there with my children.

The neighborhood is very quiet and peaceful, especially in the evening and on weekends. This is a residential neighborhood.

The neighbors are considerate and rarely have parties.

When parties are held, the amplified music carries throughout the neighborhood and can be heard distinctly on many properties.

My parents and other neighbors are concerned about the County's proposal to rent out the Gardens for Wedding and other private parties. The fact that there will be 24 a year (up to 4 a month) will have a huge negative impact on the neighborhood. Party noise will become a regular occurrence.

The noise analysis done in the Draft SEIR is incomplete and does not accurately capture the impact of the noise on the neighborhood.

-
I ask that you follow the suggestion made by Antony Spencer (1075 Carolyn Way) who has had extensive experience with noise studies. He has written a letter and attached a Noise Report from Vanguardia Limited, outlining what should be done to accurately assess the impact of noise on the neighbors from the proposed changes.

Thank you very much,

Adam Checchi

Adam Checchi
Checchi Capital Advisers, LLC
9720 Wilshire Blvd, 4th Floor, Beverly Hills, California 90212
(310) 432-0010 www.checchicapital.com

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100-1

Responses to Letter 100 – Adam Checchi

Response to Comment 100-1:

Thank you for your comment. This comment provides anecdotal information about the neighborhood surrounding the Gardens. The comment also claims that the Draft SEIR is incomplete and does not accurately capture the impact of noise in the neighborhood. The comment references a comment letter from another neighbor, which is included as Letter 109c. As described in Section 3.14 *Noise* and Appendix E of the Draft SEIR, a site-specific noise impact assessment was prepared by qualified noise specialists. Please see Master Response 4 and Master Response 5.

Letter 101a - Robin Kim - September 5, 2022

From: [robin.kim](#)
To: [Jui Ing Chien](#)
Cc: [Timmi Tway](#)
Subject: Proposed Changes on the Virginia Robinson Garden
Date: Monday, September 5, 2022 6:53:20 PM
Attachments: [VRG Letter to request info to Ms. J. Chien.pdf](#)

CAUTION: External Email. Proceed Responsibly.

Dear Ms. Chien,

I oppose the proposed changes and find the environmental impact analysis for this project incomplete in many aspects. I endorse the comments submitted by my neighbor, Charles Alpert, on September 2, 2022.

Further, please find the attached Letter to request information before this proposed changes can be moved forward.

Sincerely,

Robin Kim

101a-1

Responses to Letter 101a – Robin Kim

Response to Comment 101a-1:

Thank you for your comment. The commenter opposes the Project and believes the Draft SEIR is incomplete. The commenter endorses a neighbor's comment letter, which is included in this Final SEIR as Letter 89. The commenter also included an attachment, which is provided as Letter 101b below. No further response is required.

Letter 101b - Robin Kim- September 5, 2022

September 5, 2022

Via Email: jchien@parks.lacounty.gov

Ms. Jui Ing Chien
Park Planner
County of Los Angeles
Department of Parks and Recreation
1000 S. Fremont Ave.
Unit #40 A-9 West, 3rd Floor
Alhambra, California 91083

Re: Comments on Virginia Robinson Garden Expansion Plan

Dear Ms. Chien and to Whom It May Concern:

1. Save the Virginia Robinson Garden from risks of fire and damages by the Private parties and events; and provide a comprehensive plan to prevent such risks;
2. Preserve the Virginia Robinson Garden Estate from mass visitors and show how the docent-led programs will be added and performed to ensure the estate is not ruined and damaged;
3. Disclose the Students' educational programs and its historic data and all other programs and activities in order to ensure the Garden has been used properly;
4. Disclose the outreach efforts made to improve the students' educational programs to benefit more students from L.A. County and especially Title 1 Schools;
5. Show the transparency on the maintenance costs and Friends of Robinson Garden's accounting for donations received and its expenditures;
6. Show how the private parties will be booked and managed fairly without making the Estate an exclusive backyard for some connected people and provide a rationale for what makes this expansion a public benefit;
7. Listen to the neighborhoods to their concerns, and provide mitigation measures which will protect the neighborhood; and
8. Honor the original donor agreement, and provide an explanation of why L.A. County believes they can break the agreement.

101b-1

101b-2

101b-3

Sincerely,

Robin Kim

1005 Elden Way

Name

Address

Responses to Letter 101b – Robin Kim

Response to Comment 101b-1:

Please refer to Response to Comment 83-1. This comment is noted.

Response to Comment 101b-2:

Please refer to Response to Comment 83-2. This comment is noted.

Response to Comment 101b-3:

Please refer to Response to Comment 83-3. This comment is noted.

Proposed Operational Changes at the
Virginia Robinson Gardens
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Letter 102 - Kyrstin Munson - September 5, 2022

From: Sharon Messer
To: Jui-Ing Chien
Cc: Kathy Cheschi
Subject: Sent on behalf of Kyrstin Munson in opposition to changes at VRG
Date: Monday, September 5, 2022 7:26:08 PM

CAUTION: External Email. Proceed Responsibly.

By email jchien@Parks.lacounty.gov

Dear Ms. Chien,

As a former resident of Cove Way, I am writing to express my OPPOSITION to the proposed Operating Changes to the Virginia Robinson Gardens.

The Draft SEIR is inaccurate in its analysis of traffic in our neighborhood. The Traffic Study was conducted on one day in February when many people were still working from home and not commuting. It's not an accurate representation of what the traffic is like now. Now more people are back to work and the traffic is worse than it was before the Pandemic.

Our neighborhood sits between two are major thoroughfares to the Valley- Benedict Canon on the West and Beverly Drive which feeds into Coldwater Canyon on the East. Lexington Avenue is the cross street connecting these two major thoroughfares.

Cars line up along Hartford Way especially in the afternoon idling and waiting in line to turn right onto Coldwater Canyon. Cars often block driveways and the streets especially Cove Way and Pamela Drive which turn onto Hartford Way. Sometimes these cars back all the way up on to Lexington in a line. Traffic is completely stalled on Beverly Drive as it funnels into Coldwater Canyon. Already cars are backed up, idle and jam the neighborhood streets.

I am requesting that the Traffic Study be redone to reflect the situation now.

Second, the Traffic Study does not address how the Gardens will handle the 24 Special Events. The 4 current events crowd our streets with parked cars and make it impossible to get in and out of our driveways, which is especially worrisome if there is an emergency or fire.

The traffic study completely ignored the effect of the 24 proposed Special Events. All cars from those Events will arrive and leave basically together. If Uber and Lyft are used, it will mean twice as many trips- dropping off and picking up guests causing more congestion.

The County should be required to limit the Special Events to 4 and create a Traffic Management Plan for all the Events and provide a Parking Plan which would prohibit parking on all neighboring residential streets.

How can the Gardens get Valet Permits for 24 events. None of the other houses in the neighborhood would be allowed to get that many permits. The Gardens will know about their events well in advance and probably apply early for these Permits, basically preventing other neighbors from being able to get Valet Permits for their personal entertaining.

The SEIR should state how the Gardens will deal with Valet Parking permits as well as Parking for 1000 guests plus staff.

Thank you,


Kyrstin Munson

1338 N. Ogden, Los Angeles, CA 90046

102-1

102-2

102-3

Responses to Letter 102 – Kyrstin Munson

Response to Comment 102-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues. This comment provides anecdotal information regarding traffic congestion in the surrounding neighborhood. The comment also states that the Draft SEIR traffic analysis is inaccurate because conditions have changed since the traffic count was conducted. The commenter requests that the traffic impact analysis be remodeled.

The traffic impact assessment is intended to provide data in support of the Draft SEIR. Therefore, the traffic counts were conducted on February 3, 2022, prior to completion of the Draft SEIR in July 2022. Existing intersection vehicle turning movement volumes were collected during the peak periods of 7:00 a.m. to 9:00 a.m. and 4:00 p.m. to 6:00 p.m. Normal traffic activity was present at the time of the count, and schools were in session. This comment is noted.

Response to Comment 102-2:

This comment states that the traffic impact analysis “completely ignored” the effects of Special Use Events. As described on page 3-70 of the Draft SEIR, Special Use Events would comply with City ordinances, and valet service must obtain City parking permits for use of public streets to avoid overlapping events with surrounding neighbors. The current requirement of an event-specific traffic and parking plan would remain. Please refer to Master Response 2 and Master Response 3. This comment is noted.

Response to Comment 102-3:

As described in Response to Comment 102-2, Special Use Events would comply with City ordinances, and valet service must obtain City parking permits for use of public streets to avoid overlapping events with surrounding neighbors. This comment is noted.

**Proposed Operational Changes at the
Virginia Robinson Gardens
Final Supplemental Environmental Impact Report**

Letter 103 - Scott Messer - September 5, 2022

From: Sharon Messer
To: Jui-Ing Chien
Cc: Kathy Cheschi
Subject: Sent on behalf of Scott Messer opposing proposed operating changes to VRGardens
Date: Monday, September 5, 2022 7:27:34 PM

CAUTION: External Email. Proceed Responsibly.

jchien@parks.lacounty.gov

Dear Ms. Chien,

The Friends of the Robinson Gardens have submitted letters on behalf of the VRG and support of the proposed changes. As a former resident of Beverly Hills and neighbor to the VRG, I am opposed to the changes and feel that the comparison that the VRG draws to other Arboretums and Botanical Gardens is not valid and that the proposed changes are unnecessary.

1. Request to stay open until Sunset: Descanso Gardens is open until 7, South Coast Botanical Garden until 5, LA County Arboretum until 4:30 or 6:30 with shorter hours on the weekend.
2. Size and Facilities: The Descanso Gardens sits on 160 acres with 800 parking spaces and is bordered by a major highway and has a full café and catering on site with a metro train running through it. The VRG sits on 6 acres in a residential section, bordered only by private homes, has no food service available (everything must be brought in), has less than 35 parking spaces, and has no access to public transportation (bus is a 3-4 block walk, and nearest Metro will be Wilshire and Rodeo when completed).
3. The VRG compared themselves to The Wallis and to LACMA which are in a commercial/business zone and have major dedicated parking lots so that no one needs to park on neighboring streets. This is not the case with the VRG as they have gardeners and maintenance staff as well as office and event staff who would be presumable utilizing some of their "claimed" 35 spaces. *In the past, I observed that when the VRG had major events guests and staff parked on Lexington and Cove Way often for several days in a row.*
4. The VRG claims to need more hours so they can access more students. If the goal is education, then why are school tours only scheduled from 10-12:30 and limited to 42 students? Assuming a tour would be 90 minutes to 2 hours, why can't they do a second or third tour during the day? Schools try to leave a property in time to return students to school. Opening the park on Sundays would not increase the number of educational events for children.
5. The VRG is not a park. Parks are for recreation with hiking trails, walking paths, play equipment for children and dogs are allowed. The VRG is a series of winding paths through the property on uneven terrain and can only be accessed as part of organized tour (by reservation).
6. Special 24 events (up to 4 per month). This places an unreasonable burden on immediate neighbors and those on nearby streets as trucks must be brought in for catering, rentals, flowers, music, etc. The VRG is in the middle of a residential neighborhood with inadequate parking for larger events that require outside staff, valet, etc. Events with as many as one thousand guests would create a huge burden on traffic. Given the large fees for rentals, valet, permits, catering, etc., these special events would appeal only to corporate or wealthy individuals and thus doing nothing to increase inclusivity.

103-1

103-2

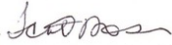
103-3

103-4

103-5

103-6

I look forward to seeing these issues addressed in the Final SEIR.

Sincerely,
Scott Messer 
1338 North Ogden, Los Angeles, CA 90046

Responses to Letter 103 – Scott Messer

Response to Comment 103-1:

Please refer to Response to Comment 99-1. This comment is noted.

Response to Comment 103-2:

Please refer to Response to Comment 99-2. This comment is noted.

Response to Comment 103-3:

Please refer to Response to Comment 99-3. This comment is noted.

Response to Comment 103-4:

Please refer to Response to Comment 99-4. This comment is noted.

Response to Comment 103-5:

Please refer to Response to Comment 99-5. This comment is noted.

Response to Comment 103-6:

Please refer to Response to Comment 99-6. This comment is noted.

Letter 104 - Marguerite Lindsay - September 5, 2022

Ms. Jui Ing Chien, Park Planner
County of LA Department of Parks & Recreation
1000 S. Fremont Ave., Unit #40 A-9 West, 3rd Floor
Alhambra, CA 91083

Dear Ms. Jui Ing Chien,

The Harry and Virginia Robinson Estate, currently known as “The Virginia Robinson Gardens (VRG),” was built in 1911, predating the incorporation of the City of Beverly Hills by two years. During its 66-year tenure as a private estate, the Robinson family built the foundation for what eventually became Beverly Hills. The Robinsons’ traveled the world with a botanist and collected rare and beautiful plants that still thrive on the 6.2-acre garden and in other parts of the city where they were introduced. The estate was used extensively by the Robinsons’ to entertain studio heads and legends of the silver screen. Likewise, they brought together heads of state and major players of corporate America. This was done in the spirit of benefiting the growth and development of society, with an emphasis on gentility and promoting philanthropic endeavors to benefit a global community. Furthermore, the underlining intent was to promote “fine living” and the advancement of the visual and performing arts.

Today as a public entity, programs echo the spirit of the family’s intent when it was deeded to the county as a house museum and botanical garden. The county, as the stewards of this historic property, not only have deeply invested in the estate’s physical restoration as a historic display garden and house museum, but have emulated the spirit of the family to build a strong community, while emphasizing the necessity to respect the past while embracing the future.

The Robinson Gardens benefits the community, including the immediate neighbors, by providing green space, resulting in positive gains in home values. For many local residences, it provides opportunities to volunteer as docents and participate in the many programs offered at VRG. One of the largest beneficiaries of this green oasis are the 2,000 elementary children, who annually visit the estate. While visiting the garden, they learn from trained docents about the value of a healthy eco-systems and the practice of planting and caring for vegetable gardens and the concept of eating wholesome-unprocessed, healthy food.

After the last expansion of the Supplemental Environment Impact Review (SEIR) in 2014, the Gardens hosted many additional events for both youth and adults. As the Superintendent of the VRG from 1997 – 2002, I witnessed a steadfast commitment to respect the integrity of the neighborhood by developing and implementing an extensive list of “Good Neighbor Policies.” These policies were reviewed and refined after each event, reacting to any concerns from the neighbors and event participants. Additionally, the county operates the venue following the Department of Interiors guidelines for Historic Buildings to further protect the historic narrative and integrity of the living and non-living collections.

The County Parks Department staff learned how to manage traffic and noise after the first expansion of the EIR in 2014, and are now poised and ready to remain sensible and responsible in executing the greater use of the property as proposed in the new SEIR. The proposed changes provide greater accessibility by offering longer hours and more open days. If adopted, this operational model will align

104-1

VRG with Descanso Gardens, in La Canada Flintridge, CA and The Huntington Gardens in San Marino, CA, both of which successfully operate in the center of residential neighborhoods, much like VRG.

Please support the proposed operational changes to VRG to allow greater accessibility to the house museum and gardens, allowing this national asset to be shared with all those who wish to experience its magic and grandeur. This is exactly what the Robinson family intended when they gifted their estate to the public in perpetuity to be operated as a house museum and botanic garden.

Most respectfully,

Mrs. Marguerite Lindsay, Elementary School SPED Paraprofessional

San Gabriel, CA 91775

104-1
cont.

Responses to Letter 104 – Marguerite Lindsay

Response to Comment 104-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues.

This comment provides anecdotal information and is in support of the Proposed Project. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

**Proposed Operational Changes at the
Virginia Robinson Gardens
Final Supplemental Environmental Impact Report**

Letter 105 - Judson Mock - September 6, 2022

From: [Judson Mock](#)
To: [Jui Ing Chien](#)
Subject: Virginia Robinson Gardens
Date: Monday, September 5, 2022 11:37:32 PM

CAUTION: External Email. Proceed Responsibly.

Dear Ms Chien,

My name is Judson Mock and I am a lifelong resident of Beverly Hills and neighbor to the Virginia Robinson Gardens. I am writing to express my concern with the proposed dramatic increase in use of the VRG as a special event venue. First and foremost, this seems incongruent with the intended mission of VRG when Mrs Robinson bequeathed the property to LA County. I cannot imagine she would have wanted her property embroiled in a contentious situation, causing excessive disruption to the neighborhood. That seems the likely reason why the number of annual special events has been so limited up to this point. The obvious issues such as traffic, parking and noise are all things that should be studied more carefully than they have been. I would respectfully suggest the County proceed in a more measured way, for example, increasing the number of events from 4 to 8. Then take the necessary steps to engage with neighbors and evaluate the actual impact of these events after they occur. If the impact is acceptable then perhaps the number could be raised again. This seems like it could work out better this way for all involved. Thank you for your consideration.

Sincerely,

Judson Mock
704 N Crescent Dr
Beverly Hills CA 90210

105-1

Responses to Letter 105 – Judson Mock

Response to Comment 105-1:

Thank you for your comment. The commenter provides introductory information and is opposed to the operational changes at the Gardens. The commenter believes the proposed changes would be incongruent with Mrs. Virginia Robinson's bequeathment of the property to the County. Please refer to Master Response 9 and Master Response 10. This comment is noted.

The remaining comments are not direct comments on the content or adequacy of the Draft SEIR and do not raise a specific environmental issue, therefore no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 106 - Kathy and Al Checchi, Michael McAlister, Jennifer and Randy Wooster, Joseph Akhtarzad, Bobby Kotick - September 6, 2022

Sent by email- jchien@parks.lacounty.gov

Dear Ms. Chien,

As residents of Cove Way and Summit Drive, we are **OPPOSED** to the changing the hours of the Virginia Robinson Garden, increasing the number of visitors and very opposed to adding 24 events. We are supportive of educational programs for school children.

We are very concerned for the reasons listed below. A parking lot for the Gardens is located at 1028 Cove Way and an increase in events, hours and number of visitors will impact our street.

We specifically asked that you examine the following issues. These issues have not been adequately addressed in the DSEIR and we ask that they be addressed in the final SEIR.

TRAFFIC

Our street is already a busy one. Drivers speed up and down the street and the entrance to the Gardens at 1028 Cove Way is at a blind spot in the road. Pulling in and out of that driveway will be difficult, as will the loading and unloading of event vehicles.

Also, in early afternoon, there is a great deal of traffic at the intersection of Cove Way and Hartford Way, as cars line up to turn right on Benedict Canyon. There are times when the entrance to our street is blocked, and we have to wait in the line of cars.

PARKING

Our street is already restricted to parking on one side, so it is packed with vehicles parking already. Often these cars are parked all day and visitors or workers coming to our residences have to park far up the hill. Any increase in visitors or events are going to impact parking greatly.

NOISE

Our neighborhood is very quiet in the evenings and on weekends. Expanding the hours of the Gardens to every day, including weekends and all Holidays will change the character of our neighborhood. We ask that the evaluation of this effect take measurements of the noise currently on the weekends and Holidays on our street.

106-1

106-2

106-3

106-4

FIRE

Our neighborhood has recently been designated as an extreme Fire Risk. In fact, many of us struggled to obtain home insurance due to this designation. The risk of fire will increase at the Gardens with more visitors and more events. An evaluation should be made of how fire would be extinguished, since the paths in the Garden are too narrow to have a fire truck enter, there is a grove of palm trees which once on fire send embers throughout the neighborhood and there is no dedicated fire hydrant in the Gardens.

106-5

We believe that the Garden could accomplish the objective of providing access within the current hours and that there is no need to increase the hours, days or number of events.

Thank you,

Kathy and Al Checchi 1007 Cove Way

Michael McAlister 1034 Cove Way, 1036 Cove Way, 1055 Carolyn Wy

Jennifer and Randy Wooster 1011 Summit Drive

Joseph Akhtarzad 1036 Summit Drive

Bobby Kotick 1011 Cove Way, 1010 Cove Way

Responses to Letter 106 – Kathy and Al Checchi, Michael McAlister, Jennifer and Randy Wooster, Joseph Akhtarzad, Bobby Kotick

Response to Comment 106-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues. This comment provides introductory information. The commenter is opposed to the operational changes at the Gardens, but supportive of the Gardens' educational programs. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Response to Comment 106-2:

The commenter provides anecdotal information regarding traffic conditions in the neighborhood surrounding the Gardens. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Response to Comment 106-3:

The commenter provides anecdotal information regarding parking in the neighborhood surrounding the Gardens. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Response to Comment 106-4:

The commenter provides anecdotal information regarding noise in the neighborhood surrounding the Gardens. Noise impacts from the Proposed Project are discussed in Section 3.14, *Noise*, beginning on page 3-29 of the Draft SEIR. The County has also prepared a site-specific noise impact study, which is included as Appendix E of the Draft SEIR. Please refer to Master Response 4 and Master Response 5.

Response to Comment 106-5:

The commenter expresses concern for fire hazards emergency access to the Project Site. Project impacts related to emergency access and fire hazards are discussed in Section 3.10, *Hazards and Hazardous Materials*, beginning on page 3-21 of the Draft SEIR and Section 3.21, *Wildfire*, beginning on page 3-77 of the Draft SEIR. Please refer to Master Response 6 and Master Response 7.

Letter 107 - Rosario Maquiddang - September 6, 2022

August 30, 2022

Via Email: jchien@parks.lacounty.gov

Ms. Jui Ing Chien
Park Planner
County of Los Angeles
Department of Parks and Recreation
1000 S. Fremont Ave.
Unit #40 A-9 West, 3rd Floor
Alhambra, California 91083

Re: Comments on Virginia Robinson Garden Expansion Plan

Dear Ms. Chien and to Whom It May Concern:

1. Save the Virginia Robinson Garden from risks of fire and damages by the Private parties and events; and provide a comprehensive plan to prevent such risks;
2. Preserve the Virginia Robinson Garden Estate from mass visitors and show how the docent-led programs will be added and performed to ensure the estate is not ruined and damaged;
3. Disclose the Students' educational programs and its historic data and all other programs and activities in order to ensure the Garden has been used properly;
4. Disclose the outreach efforts made to improve the students' educational programs to benefit more students from L.A. County and especially Title 1 Schools;
5. Show the transparency on the maintenance costs and Friends of Robinson Garden's accounting for donations received and its expenditures;
6. Show how the private parties will be booked and managed fairly without making the Estate an exclusive backyard for some connected people and provide a rationale for what makes this expansion a public benefit;
7. Listen to the neighborhoods to their concerns, and provide mitigation measures which will protect the neighborhood; and
8. Honor the original donor agreement, and provide an explanation of why L.A. County believes they can break the agreement.

107-1

107-2

107-3

Sincerely,

ROSARIO MAQUIDDANG

Name

3530 Wilshire Blvd #235, CA CA 90010

Address

Responses to Letter 107 – Rosario Maquiddang

Response to Comment 107-1:

Please refer to Response to Comment 83-1. This comment is noted.

Response to Comment 107-2:

Please refer to Response to Comment 83-2. This comment is noted.

Response to Comment 107-3:

Please refer to Response to Comment 83-3. This comment is noted.

Letter 108 - Michael and Michele Wiener - September 6, 2022

Michael & Michele Wiener
1050 Carolyn Way
Beverly Hills, CA 90210
T. 310 400 6384

September 6, 2022

Ms. Jui Ing Chien
Park Planner
County of Los Angeles
Department of Parks and Recreation
1000 S. Fremont Ave.
Unit #40 A-9 West, 3rd Floor
Alhambra, California 91083

Re: Proposed Operational Changes at the Virginia Robinson Gardens ("Gardens")

Dear Ms. Chien,

My family resides at 1050 Carolyn Way, Beverly Hills, CA 90210. The purpose of this letter is to express our opposition to operational changes at the Gardens, as currently proposed. In addition to echoing the concerns expressed by our neighbors both at the public hearings and in the correspondence, we are deeply concerned about increased noise that will invariably result from the proposed operational changes.

Previous events held at the Gardens have interfered with our ability to quietly enjoy the residence we worked hard to purchase, especially our backyard. Notwithstanding the opinions expressed in the EIR by the County's paid consultants, the sound which emanates from events at the Gardens has interfered with our ability to have a family conversation. The EIR did not address the fact that sound travels through our canyons in a manner that is different from a flat environment.

Is it meaningful to the County that if twenty-four (24) evening events are held at the Gardens, the tranquil neighborhood - which we bargained for when we chose to settle here - will begin to feel and sound like an evening under the stars at the Hollywood Bowl? Chapter 12 of the Los Angeles County Code of Ordinances provides that "Intrusive noise" means that alleged offensive noise which intrudes over and above the existing ambient noise at the receptor property. Imagine the cacophony that will result if residents - whose properties are contiguous to the Gardens - schedule events for the same afternoon or evening as an event at the Gardens.

108-1

Robinson Gardens
September 6, 2022
Page 2 of 4

We urge the County to evaluate the proposed changes using the Golden Rule (i.e., a moral principle which denotes that you should treat others the same way you would like to be treated yourself) and to reject operational changes to the Gardens use, as currently proposed.

108-1
cont.

Respectfully,



Michael & Michele Wiener
Residents

cc: Hilda L. Solis: firstdistrict@bos.lacounty.gov
Holly J. Mitchell: hollyjmitchell@bos.lacounty.gov
Sheila Kuehl: sheila@bos.lacounty.gov
Janice Hahn: fourthdistrict@bos.lacounty.gov
Kathryn Barger: kathryn@bos.lacounty.gov
Fesia Davenport: FDavenport@ceo.lacounty.gov
ttway@beverlyhills.org
cchen@beverlyhills.org

- **12.08.390 - Exterior noise standards—Citations for violations authorized when.**

[SHARE LINK TO SECTION](#)[PRINT SECTION](#)[DOWNLOAD \(DOCX\) OF SECTION](#)[EMAIL SECTION](#)

A.

Unless otherwise herein provided, the following exterior noise levels shall apply to all receptor properties within a designated noise zone:

....

Unless otherwise herein provided, no person shall operate or cause to be operated, any source of sound at any location within the unincorporated county, or allow the creation of any noise on property owned, leased, occupied or otherwise controlled by such person which causes the noise level, when measured on any other property either incorporated or unincorporated, to exceed any of the following exterior noise standards:

Standard No. 1 shall be the exterior noise level which may not be exceeded for a cumulative period of more than 30 minutes in any hour. Standard No. 1 shall be the applicable noise level from subsection A of this section; or, if the ambient L50 exceeds the foregoing level, then the ambient L50 becomes the exterior noise level for Standard No. 1.

Standard No. 2 shall be the exterior noise level which may not be exceeded for a cumulative period of more than 15 minutes in any hour. Standard No. 2 shall be the applicable noise level from subsection A of this section plus 5dB; or, if the ambient L25 exceeds the foregoing level, then the ambient L25 becomes the exterior noise level for Standard No. 2.

Standard No. 3 shall be the exterior noise level which may not be exceeded for a cumulative period of more than five minutes in any hour. Standard No. 3 shall be the applicable noise level from subsection A of this section plus 20dB; or, if the ambient L8.3 exceeds the foregoing level, then the ambient L8.3 becomes exterior noise level for Standard No. 3.

Standard No. 4 shall be the exterior noise level which may not be exceeded for a cumulative period of more than one minute in any hour. Standard No. 4 shall be the applicable noise level from subsection A of this section plus 15dB; or, if the ambient L1.7 exceeds the foregoing level, then the ambient L1.7 becomes the exterior noise level for Standard No. 4.

Standard No. 5 shall be the exterior noise level which may not be exceeded for any period of time. Standard No. 5 shall be the applicable noise level from subsection A of this section plus 20dB; or, if the ambient L0 exceeds the foregoing level then the ambient L0 becomes the exterior noise level for Standard No. 5.

C.

If the measurement location is on a boundary property between two different zones, the exterior noise level utilized in subsection B of this section to determine the exterior standard shall be the arithmetic mean of the exterior noise levels in subsection A of the subject zones. Except as provided for above in this subsection C, when an intruding noise source originates on an industrial property and is impacting another noise zone, the applicable exterior noise level as designated in subsection A shall be the daytime exterior noise level for the subject receptor property.

D.

The ambient noise histogram shall be measured at the same location along the property line utilized in subsection B of this section, with the alleged intruding noise source inoperative. If for any reason the alleged intruding noise source cannot be turned off, the ambient noise histogram will be estimated by performing a measurement in the same general area of the alleged intruding noise source but at a sufficient distance such that the noise from the alleged intruding noise source is at least 10dB below the ambient noise histogram in order that only the actual ambient noise histogram be measured. If the difference between the ambient noise histogram and the alleged intruding noise source is 5 to 10dB, then the level of the ambient noise histogram itself can be reasonably determined by subtracting a one-decibel correction to account for the contribution of the alleged intruding noise source.

E.

In the event the intrusive exceeds the exterior noise standards as set forth in subsections B and C of this section at a specific receptor property and the health officer has reason to believe that this violation at said specific receptor property was unanticipated and due to abnormal atmospheric conditions, the health officer shall issue an abatement notice in lieu of a citation. If the specific violation is abated, no citation shall be issued therefor. If, however, the specific violation is not abated, the health officer may issue a citation.

(Ord. 11778 § 2 (Art. 4 § 403), 1978: Ord. 11773 § 2 (Art. 4 § 403), 1978.)

Responses to Letter 108 – Michael and Michele Wiener

Response to Comment 108-1:

Thank you for your comment. This commenter provides anecdotal information and states that they are opposed to the Project. The commenter claims that the noise impact assessment did not account for topography in the neighborhood. Noise impacts from the Proposed Project are discussed in Section 3.14, *Noise*, beginning on page 3-29 of the Draft SEIR. The County has also prepared a site-specific noise impact study, which is included as Appendix E of the Draft SEIR. Please refer to Master Response 4 and Master Response 5. This comment is noted.

Letter 109a - Antony Spencer - September 6, 2022

*1075 Carolyn Way
Beverly Hills
California 90210*

Julie Yom AICP, Park Planner
County of Los Angeles
Department of Parks and Recreation
1000 S. Fremont Avenue
Unit 40 A-9 West, 3rd Floor
Alhambra
California 91083

7th December 2021

Dear Ms Yom,

**RE: Proposed Supplemental Environmental Impact Report
Increased usage of Virginia Robinson Gardens, Beverley Hills**

I am completely opposed to any expansion of the current scope of operations, which is absolutely inappropriate in a quiet residential area.

I have lived for approximately 8 years with my wife close to Virginia Robinson Gardens, at 1075 Carolyn Way. I am therefore very well aware that this is a quiet residential neighbourhood, rich in nature, and with a road network that has only a limited capacity to carry traffic and to support parking. Virginia Robinson Gardens is a pleasant oasis, set deep within the residential area.

What is proposed is a considerable increase in activity, which will be to the total detriment of the residents who live in the area. Residents are already severely impacted under the current conditions, and I am completely opposed to any further increases in use.

The proposal seeks that there should be a doubling of daily visitors, a 6-fold increase in events, and an extension of activities from 4pm to sunset (which is 8.10pm in mid-summer). This is totally unreasonable.

Your current concern is the scope of the SEIR. I advocate that this should focus upon:

- Noise; primarily the noise arising from events, especially amplified music and speech, and especially outside the main working day, when residents are entitled to expect quiet enjoyment of their homes. The assessment should include ambient noise readings taken in the evening in a variety of conditions, and predictions spanning the wide range of event types that are envisaged.

109a-1

- Transportation/traffic; particularly how parking of vehicles is to be accommodated without causing environmental damage. It is particularly important that the assessment considers staff and contractors' vehicles as well as the vehicles of those attending events.
- There should be an assessment by speaking to the nearby neighbors that seeks to understand just how impactful the current situation is. Multiple neighbors report cars routinely blocking access to their homes, event cars and truck parking on Elden Way in violation of the rules, etc. This is a health and safety issue that must be explored to the fullest. And that means speaking to those who live nearby.
- Air quality/greenhouse gas emissions; since all users of the site are likely to arrive and depart by motor vehicle, it is clear that this is not a sustainable location for commercial activity of the type proposed. The assessment should take into account drivers having to cruise around the area in search of parking, and performing manoeuvres in order to park in constricted spaces.
- Urban character; noting that what is proposed is a high degree of commercial activity in the midst of a quiet residential area with a very distinct character.
- The other issues you identify (namely energy and historical resources are important too.

109a-1
cont.

I shall be grateful if you will keep me informed of your progress, and also ensure that I am notified of further opportunities to comment upon what is proposed.

Yours sincerely,

Antony Spencer & Laurie Spencer

Responses to Letter 109a – Antony Spencer

Response to Comment 109a-1:

This comment letter was previously provided to the County on December 7, 2021. The letter outlines topics that the commenter wished to be included in the Draft SEIR. The topics include noise, traffic, parking, air quality/greenhouse gases, land use setting, historical resources, and energy. All of these topics have been covered in the Draft SEIR. As this comment was written prior to completion of the Draft SEIR, it is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue. No further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 109b - Antony Spencer - September 6, 2022

*1075 Carolyn Way
Beverly Hills, California 90210*

Sent by email jchien@parks.lacounty.gov

Dear Ms. Chien,

RE: Comments on Draft SEIR

I am completely opposed to any expansion of the current scope of operations, which is absolutely inappropriate in a quiet residential neighborhood.

I am attaching the Letter I sent to Ms. Julie Yom on December 7, 2021, during the scoping period for the Draft SEIR.

I firmly believe that this letter and the attached study by Vanguardia Limited completely outlines the type of noise study required to assess the impact of events held at the Robinson Gardens.

Intrusive Noise is prohibited by the Municipal Code cited below:

12.08.210 Intrusive noise

"Intrusive noise" means that alleged offensive noise which intrudes over and above the existing ambient noise at the receptor property.

Ord. 11778 §2 (Art. 3 §302(q)), 1978; Ord. 11773 §2 (Art. 3 §302(q)), 1978.)

The Draft SEIR is woefully inadequate in its assessment of noise impact on the neighborhood. I am asking the County to do an adequate Noise Study for the Final SEIR. Once an adequate study is performed, the County will see how noise carries through this neighborhood and why we are all concerned.

Yours sincerely,

Antony Spencer & Laurie Spencer

109b-1

Responses to Letter 109b – Antony Spencer

Response to Comment 109b-1:

Thank you for your comment. The commenter states that the Draft SEIR is “woefully inadequate” in its assessment of noise impacts associated with the Proposed Project. As described in Section 3.14 *Noise* and Appendix E of the Draft SEIR, the noise impact assessment was conducted by qualified noise specialists. Please see Master Response 4 and Master Response 5.

Letter 109c - Antony Spencer - September 6, 2022

INCREASED USAGE OF VRG - NOISE

0051346-0820-0

VANGUARDIA

VIRGINIA ROBERTS GARDEN (VRG)

7TH DECEMBER 2021

PROJECT NOTE

DOCUMENT CONTROL			
DOCUMENT TITLE	VIRGINIA ROBERTS GARDEN (VRG)	REVISION	R00
DOCUMENT NUMBER	0051346-0820-0	ISSUE DATE	7 TH DECEMBER 2021
PROJECT NAME	INCREASED USAGE OF VRG - NOISE	AUTHOR	DANI FIUMICELLI
STATUS	ISSUE	CHECKED	JS
ISSUED TO	ANTONY SPENCER	PASSED	DB

INTRODUCTION

- 1.1. This Project Note provides comments regarding the noise issues associated with the proposed Supplemental Environmental Impact Report (SEIR) for the increased usage of Virginia Robinson Gardens, 1075 Carolyn Way, Beverley Hills, CA (VRG).

UNDERSTANDING OF THE PROPOSAL

- 1.2. It is understood that the proposed changes to the use of the VRG will mean a considerable increase in activity with a doubling of daily visitors, a 6-fold increase in events, including use of amplified sound, and an extension of activities from 4pm to sunset (which is understood to be in the mid-evening around 8.00 pm in mid-summer), with associated increases in vehicular traffic to and from the VRG.

BASELINE BACKGROUND NOISE LEVELS AND AMBIENT SOUNDSCAPE

- 1.3. The effect of noise on people and the use of their homes not only depends on how loud the noise is in terms of noise level, and any relevant regulatory controls; but also, how the noise in question relates to existing background noise levels and the ambient soundscape.
- 1.4. For example, this would include considering the following:
 - What might be the difference between representative background noise levels at outdoor amenity spaces at residential properties and the predicted noise from VRG? and,

109c-1

- What might be the increase in noise level at outdoor amenity spaces at residential properties due to the predicted noise from VRG? and,
- Does the noise from VRG contain characteristics that increase its impact? For example, the low frequency bass thump of modern amplified music and the information content of amplified speech mean that the noise has a greater impact compared to the relatively anonymous sound such as steady traffic noise from busy but distant highways.
- How might the noise from VRG contrast or blend with the existing soundscape at outdoor amenity spaces at residential properties? i.e. how congruous will the noise from VRG be in the context of the existing sounds making up soundscape in the area.

- 1.5. Consequently, any noise assessment for the SEIR should include a comprehensive baseline noise survey and observations of the soundscape at locations representative of residential properties around the VRG.
- 1.6. Background noise levels and the ambient soundscape typically vary depending on the time of the day, evening or night, between weekdays and weekends day of the week, and with the weather conditions.
- 1.7. Therefore, any baseline survey should be sufficiently long enough to capture sufficient data so that outliers and anomalous values can be rejected and there remain enough values to be able to understand the variability of the baseline noise levels through day, evening and night periods and use statistical analysis to establish representative background noise levels and observations of the ambient soundscape.
- 1.8. Typically, this requires continual monitoring for 15 minute periods over a minimum of a 7 day period to be able to capture sufficient data to understand and manage the associated uncertainties so that any derived background noise levels and ambient soundscape observations can be confidently relied upon.

SPATIAL EXTENT OF THE NOISE ASSESSMENT FOR THE SEIR

- 1.9. The district around VRG is almost exclusively residential in character with correspondingly relatively quiet background noise levels and a tranquil ambient soundscape. Noise will

109c-1
cont.

therefore not decay to below background noise levels or stop being incongruous in the context of the ambient soundscape until it has travelled some distance from the VRG.

1.10. Consequently, intensification of existing and introduction of more noise generating activities at the VRG has potential to cause disturbance and disruption to not only residents of properties adjacent to the VRG but also those some distance from the premises.

1.11. It is therefore suggested that the spatial extent of the noise assessment should be carefully considered and a distance of 750 feet from the boundary of the VRG is considered a likely minimum.

SOURCES OF NOISE

1.12. The main sources of noise associated with the proposed changes to the use of VRG that should be included in the SEIR include the following:

- Amplified music and speech
- Crowds
- Traffic
- Miscellaneous e.g. temporary plant installations such a generators or refrigeration equipment for catering, and fireworks.

NOISE PREDICTIONS

1.13. Assessment of the noise from the proposed increased use of the VRG will be dependent on theoretical prediction of noise propagation.

1.14. There are several methods of predicting the propagation of noise e.g. ISO 9613 is a common method.

1.15. Whatever method is used to predict noise levels from the VRG it should include the following parameters that influence the propagation of noise

- Robust source levels i.e. the sound power and frequency spectrum of the source should be realistic and verifiable.
- The effect of distance (geometric spreading).

109c-1
cont.

- Source directivity characteristics.
- Source emission characteristics e.g. some Public Address system (PAs) propagate as a line source at a lower rate of decay before the decay increases to that of a point source at a faster rate.
- The effects of topography and buildings acting as barriers to the propagation of noise
- Ground absorption.
- Air absorption.
- Relative humidity and temperature.
- Meteorological conditions e.g. wind direction.
- Acoustic reflections other than from the ground.

NOISE PREDICTION VERIFICATION

- 1.16. Whilst the prediction of the noise from VRG will be a starting point in the noise assessment for the SEIR, there will be the opportunity to verify the predictions from amplified sound by installing a temporary PA at the VGR and carrying out noise propagation tests.
- 1.17. Such a test would involve temporary installation of a PA configured in a way typical of likely an event at VGR and playing test examples of sound at various levels, whilst simultaneously measuring at a reference point at the VRG e.g. the sound mixing/control point at VRG, and at representative residential locations at various distances around the VRG.
- 1.18. The propagation test would provide real world empirical data directly relevant to the VRG and surrounding locations that could be used to verify the noise predictions and reduce the inevitable uncertainties associated with theoretical prediction of noise propagation so that, they could be more confidently relied upon in the noise assessment in the SEIR.

SUMMARY

- 1.19. Noise from the proposed changes and intensification of use of the VGR has the potential to cause significant adverse effects to people living at and using residential properties adjacent to and some distance from the VGR.

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cont.

INCREASED USAGE OF VRG - NOISE

0051346-0820-0

VANGUARDIA
CORPORATION

VIRGINIA ROBERTS GARDEN (VRG)

7TH DECEMBER 2021

- 1.20. As well as considering regulatory requirements, the assessment of the noise in the SEIR from the proposed changes at VGR should include a comprehensive baseline noise survey to establish representative background noise levels and ambient sound conditions in outdoor amenity spaces at residential properties adjacent too, and to at least 750 feet from, the perimeter of the VGR.
- 1.21. The assessment of the impact of noise from the VGR should include evaluation against regulatory requirements, and of the difference between the noise from VGR and baseline noise, the increase in noise levels compared to existing conditions, allow for any acoustic characterises that might enhance the impact of the noise, and evaluate how congruous the noise will be with the existing soundscape.
- 1.22. The sources of noise included in the SEIR assessment should include all those likely to be audible beyond the boundary of the VGR.
- 1.23. The prediction of the propagation of noise from sources at the VGR should be based on reliable source data and include relevant factors that influence propagation of noise outdoors.
- 1.24. Predictions of amplified noise should be verified by a propagation test using a temporarily installed PA and simultaneous measurements at the VGR and various representative residential properties adjacent to and at multiple distances from the premises.

109c-1
cont.

INCREASED USAGE OF VRG - NOISE

0051346-0820-0

VANGUARDIA
LIMITED

VIRGINIA ROBERTS GARDEN (VRG)

7TH DECEMBER 2021

PROJECT NOTE DISCLAIMER:

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Registered in England 05666276



VANGUARDIA LIMITED

LONDON OFFICE

The Ministry
79-81 Borough Road
London SE1 1DN

MANCHESTER OFFICE

Jactin House
24 Hood Street
Manchester M4 6WX

HEAD OFFICE

21 Station Road West, Oxted
Surrey RH8 9EE

Tel +44 (0) 1883 718690

office@vanguardia.co.uk
vanguardia.co.uk

Responses to Letter 109c – Antony Spencer

Response to Comment 109c-1:

This comment letter was previously provided to the County on December 7, 2021. The letter outlines a proposed strategy to analyze noise impacts associated with the Proposed Project. As described in Section 3.14 *Noise* and Appendix E of the Draft SEIR, a site-specific noise impact assessment was prepared by qualified noise specialists. Please see Master Response 4 and Master Response 5.

Letter 110 - Charles Alpert - September 6, 2022

From: [Chuck Alpert](#)
To: [Jui Ing Chien](#)
Cc: [Kathy Checchi](#); [Chong-Castillo, Maria](#); [Chloe Chen](#)
Subject: Re: MATERIAL FAILURE TO COMPLY WITH CEQA PUBLIC PARTICIPATION REQUIREMENTS --VIRGINIA ROBINSON GARDENS
Date: Tuesday, September 6, 2022 12:07:46 PM

CAUTION: External Email. Proceed Responsibly.

ALL ISSUES RAISED IN THIS CORRESPONDENCE ARE INTENDED TO BE PART OF THE CEQA RECORD AND PRESERVED AS POTENTIAL CONTESTED MATTERS IN THE EVENT OF LITIGATION.

September 6, 2022

Ms. Jui Ing Chien
Park Planner
County of Los Angeles
Department of Parks and Recreation
1000 S. Fremont Ave.
Unit #40 A-9 West, 3rd Floor
Alhambra, CA 91083

re: DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT (DSEIR)
Proposed Operational Changes at the Virginia Robinson Gardens
State Clearinghouse Number: 2012091034

Ms. Chien:

Public participation is a mandated and essential component of CEQA. California CEQA Guidelines, Section 15201.

In *Concerned Citizens of Costa Mesa v 32nd District Agricultural Association* (1986) 42 Cal 3d 929, the court further emphasized this public participation concept stating that "... the public holds a 'privileged position' in the CEQA process 'based on a belief that citizens can make important contributions to environmental protection and on notions of democratic decision making.'"

"CEQA compels an interactive process of assessment of environmental impacts and responsive project modification which must be genuine. It must be open to the public, premised upon a full and meaningful disclosure of the scope, purposes, and effect of a consistently described project, with flexibility to respond to unforeseen insights that emerge from the process."
County of Inyo v. City of Los Angeles (1984) 160 Cal.App.3d 1178, 1185.

110-1

What has the County afforded myself and other members of the public in this matter:

1. **Less than a full 45 days to comment contrary to CEQA requirements and court decisions;**
2. A virtual public hearing held on November 15, 2021 on the scope of the DSEIR where members of representatives of the Friends of Virginia Robinson Gardens were given unlimited time to speak whereas public members were limited in time. At several points, the Friends and the County refuted or rebutted comments made by the public members when the purpose of the hearing was solely to illicit comments on the proper scope of the environmental review.
3. At in-person public meeting with neighbors of the Gardens where a county parks and recreation official in response to a question as to whether the County wanted the additional Special Use events because the County could not afford to operate Robinson Gardens, the official emphatically denied that assertion. Yet, the DSEIR states the following: "The [special uses] purpose is to generate funds to reduce taxpayer dollars needed to support the Gardens." DSEIR p. 1-2.
4. A virtual hearing held on August 10, 2022 for comment on the DSEIR where the county official moderating the public meeting imposed a time limitation on speakers even though the hearing finished nearly an hour before the allotted time for the meeting.
5. Just prior to the above referenced Aust 10, 2022 virtual hearing, a county official advised a spokesperson of the Friends of the Robinson Gardens on what to say at the hearing.
6. **A project description and environmental analysis that is ambiguous, confusing and less than forthright contrary to CEQA regulations and court decisions**, in the following material ways:
 - a. A misleading statement in the project description of the existing material operating conditions or terms for "Types of Events" and "Special Uses." (See previous comment)
 - b. A lack of clarity on the distinction between an "event" and a "special use." A reasonable person, for example, cannot discern whether a wedding is a "special use" subject to a limit of 24 times/year or an event that can happen with an unlimited frequency. Such detail triggers a range of different impacts.
 - c. A lack of any standard for the exercise of the Superintendent's discretion in determining operating procedures leading to a grant in effect of arbitrary discretion.
 - d. A lack of any explanation of how onsite parking executes when parking and traffic represents a significant environmental impact per the DSEIR.
 - e. A lack of clarity as to the role of the Friends of the Robinson Gardens in the future operation of the Gardens.
 - f. A failure to include special uses in the traffic analysis.
 - g. A failure to analyze obvious cumulative impacts, especially the impacts of

110-1
cont.

simultaneous events at the Beverly Hills Hotel.

- h. A failure to provide detailed attendance data to determine whether in fact the public has been denied access under current operating terms or whether
- i. The DSEIR project description deletes or ignores all of the agreed upon 2012/2014 negotiated terms with no reasonable explanation or discussion. Indeed, the DSEIR ignores discussion of the negotiations between certain adjacent neighbors and the County which resulted in the existing operating terms for the Gardens. See, 2012 DSEIR/2014 SEIR.
- j. The DSEIR ignores any discussion of the terms of the Virginia Grant Deed which strictly limits the use of the Gardens to a public "botanic garden and arboretum and no other purpose" such terms explicitly prohibit nearly all of the proposed changes, namely the various types of uses proposed: weddings, heath classes, wine tastings, private parties and the like.
- k. The DSEIR does not contain any discussion of the retention of the consultant(s) preparing the DSEIR or otherwise associated with the hearing process. The consultants' contract retention terms, the consultant's credentials, the consultant's prior relationships with the County and the consultant's contact with members of the Friends are missing from the DSEIR.

"CEQA does not require technical perfection in an EIR, but rather adequacy, completeness, and **a good-faith effort at full disclosure**. A court does not pass upon the correctness of an EIR's environmental conclusions, but only determines if the EIR is sufficient as an informational document. (*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692)." *CEQA Guidelines*, 15003(i) (Policies) (Emphasis added.) In this case the DSEIR remains inherent deficient and other than a "good-faith effort at disclosure."

Unfortunately, every appearance exists that the referenced DSEIR does not include a good-faith effort at full disclosure of material facts and information necessary to fairly evaluate the environmental impacts of the proposed operational changes for the Robinson Gardens .

PLEASE BE ADVISED, THAT THE COUNTY IS ON NOTICE THAT PROCEEDING WITH FINAL DETERMINATION ON THIS MATTER WITHOUT CORRECTING THESE MATERIAL DEVIATIONS FROM THE LEGAL REQUIREMENTS OF THE CEQA PROCESS MAY LEGALLY INVALIDATE ANY FINAL DETERMINATION.

PLEASE BE FURTHER ADVISED, THAT THE COUNTY SHOULD PRESERVE ALL RECORDS, RECORDED AND WRITTEN, RELATED TO THE PUBLIC HEARINGS AND MEETINGS IN THIS MATTER IN THE EVENT OF LITIGATION.

Again, the CEQA review process for the DSEIR remains legally, materially deficient. This process certainly fails to enhance or even provide basic protections for public participation, the cornerstone of the CEQA process.

Respectfully,

Charles Alpert
calpert@hotmail.com

110-1
cont.

Responses to Letter 110 – Charles Alpert

Response to Comment 110-1:

This comment discusses public participation and cites the *Concerned Citizens of Costa Mesa v. 32nd District Agricultural Association* court case and the *County of Inyo v. City of Los Angeles* court cases and their discussion of public participation. This comment quotes court cases and CEQA requirements regarding public review and does not raise any issues regarding the content or adequacy of the environmental analysis in the Draft SEIR. This comment is noted. No further response is required.

1. This comment asserts that there has been less than a full 45 days to comment..." Please refer to Response to Comment 76-3 where it is demonstrated that the review period was extended to 46 days, in compliance with CEQA. No further response is required.
2. This comment is regarding the virtual public meeting held on November 15, 2021, for the Proposed Project. This meeting was held to inform the public about the Proposed Project and to receive public input regarding the environmental analysis. This comment is noted.
3. This comment is regarding Special Use Events. The commenter states what was said at an in-person public meeting and refers to what is stated in the Draft SEIR regarding special use permits. Specifically, the Draft SEIR states the following regarding current operations at the Project Site:

"There is also a limit of four Special Use Events per year as identified in the 2014 SEIR. These Special Use Events are limited in the number of attendees. Their purpose is to generate funds to reduce taxpayer dollars needed to support the Gardens." Draft SEIR page 1-2. Funds and the use of taxpayer dollars is not a CEQA issue. This comment does not raise any issues regarding the content or adequacy of the environmental analysis in the Draft SEIR for the Proposed Project and does not raise a specific environmental issue. This comment is noted. No further response is required.

4. This comment is regarding a virtual public meeting held on August 10, 2022 and a time limitation for speaking at that meeting. Please refer to Response to Comment 76-4 which discusses the lead agency's ability to limit time at public meetings. This comment does not raise any issues regarding the content or adequacy of the environmental analysis in the Draft SEIR for the Proposed Project and does not raise a specific environmental issue. This comment is noted. No further response is required.
5. This comment does not raise any issues regarding the content or adequacy of the environmental analysis in the Draft SEIR for the Proposed Project and does not raise a specific environmental issue. This comment is noted. No further response is required.
6. This comment states that the project description and environmental analysis is ambiguous, confusing and less than forthright and is contrary to CEQA regulations and court decisions. This comment goes on to provide a list of items a. through k., each of which is responded to below:

- a. This comment states that the project description includes a misleading statement regarding the existing operation conditions.

Response: This comment is noted. Please refer to Response to Comment 82-1.

- b. This comment states that there is a lack of clarity regarding the distinction between an "event" and a "special use".

Response: Events are described in Section 2.0, Project Description, of the Draft SEIR for the Proposed Project. Section 2.2.3, Special Use Events, on page 2-4 of the Draft SEIR describes Special Use Events.

- c. This comment is regarding what the commenter states is a lack of any standard for the exercise of the Superintendent's discretion in determining operation procedures.

Response: This comment does not raise any issues regarding the content or adequacy of the environmental analysis in the Draft SEIR for the Proposed Project and does not raise a specific environmental issue. This comment is noted. No further response is required.

- d. This comment states that there is a lack of any explanation of how onsite parking executes.

Response: Contrary to this comment, parking is addressed in Section 2.4.5, Parking, on page 2-8 of the Draft SEIR. Additionally, Section 3.18, Transportation, specifically addresses parking in the Parking Analysis sub-section on pages 3-69 and 3-70 of the Draft SEIR.

- e. This comment states that there is a lack of clarity as to the role of the Friends of the Robinson Gardens in the future operation of the gardens.

Response: This comment does not raise any issues regarding the content or adequacy of the environmental analysis in the Draft SEIR for the Proposed Project and does not raise a specific environmental issue. This comment is noted. No further response is required.

- f. This comment states that there is a failure to include special uses in the traffic analysis.

Response: Contrary to this comment, Section 3.18, Transportation, specifically addresses parking in the Parking Analysis sub-section on pages 3-69 and 3-70 of the Draft SEIR. Parking for Special Use Events is discussed in the first full paragraph on page 3-70 of the Draft SEIR.

- g. This comment states that there is not an analysis of cumulative impacts, especially the impacts of simultaneous events at the Beverly Hills Hotel.

Response: In compliance with CEQA, Cumulative impacts are addressed in the Draft SEIR (specifically Section 5.1 on page 5-1 of Draft SEIR). To analyze the cumulative impacts of the Project in combination with existing development and other expected future growth, the amount and location of growth expected to occur (in addition to the Proposed Project) must be considered. As stated in CEQA Guidelines Section 15130(b), this reasonably foreseeable growth may be based on either of the following, or a combination thereof:

- list of past, present, and reasonably anticipated future projects producing related or cumulative impacts, including those projects outside the control of the agency
- A summary of projections contained in an adopted general plan or related planning document which is designed to evaluate regional or area wide conditions

The Proposed Project includes changes to the operational characteristics of the Project Site and would not substantially change or affect surrounding properties, nor would it conflict with other localized residential construction. The Beverly Hills Hotel is located near the Proposed Project Site, however simultaneous events are not anticipated to impact operations at the Project Site as the hotel would implement its own event parking and valet arrangements.

- h. This comment states that the Draft SEIR for the Proposed Project does not provide detailed attendance data to determine whether in fact the public has been denied access under current operating terms.

Response: The County reviewed attendance data as part of the determination for the need for the Proposed Project. This comment does not raise a specific environmental issue regarding the Proposed Project. This comment is noted. No further response is required.

- i. This comment states that the Draft SEIR project description does not address all of the agreed upon 2012/2014 negotiated terms and that the project description does not discuss the negotiations between certain adjacent neighbors and the County which resulted in the existing operating terms for the Gardens.

Response: The Draft SEIR analyzes the potential impacts of the Proposed Project. The existing condition (or baseline) of the Draft SEIR analysis was as of the date of the Notice of Preparation (NOP) as required by CEQA Sections 15125. This comment is noted.

- j. This comment states that the Draft SEIR for the Proposed Project does not include a discussion of the terms of the Virginia Grand Deed which limits the use of the gardens to a public "botanic garden and arboretum and no other purpose".

Response: Please refer to Master Response 8. In addition, the Draft SEIR incorporated by reference (per CEQA Guidelines Section 15150) the 2012 Draft SER and the 2014 Final SEIRs which contained a description of the Virginia Grant Deed.

- k, This comment states that the Draft SEIR does not include a discussion of the retention of the consultant(s) preparing the Draft SEIR or otherwise associate with the hearing process and that "The consultants' contract retention terms, the consultant's credentials, the consultant's prior relationships with the County and the consultant's contact with members of the Friends are missing from the DSEIR."

Response: The information that the commenter states is not in the Draft SEIR is not included because it is not germane to the environmental analysis of the Proposed Project. Section 8.0, List of Preparers, provides a list of those who contributed to the preparation of the Draft SEIR for the Proposed Project. This comment is noted. No further response is required.

The commenter provided a comment in which CEQA was quoted stating that CEQA requires adequacy, completeness, and a good-faith effort at full disclosure. This comment states that the Draft SEIR is deficient and does not provide a good-faith effort at disclosure, review, and public participation. This comment is noted. Please refer to previous responses above in Response to Comment 110-1.

Letter 111 - Kathy Checchi - September 6, 2022

From: [Kathy Checchi](#)
To: [Sheila; Rodrigo Castro-Silva](#)
Cc: [Jui Ing Chien; Chong-Castillo, Maria; lweiner@rwolaw.com](#)
Subject: False and Misleading Information
Date: Tuesday, September 6, 2022 1:25:43 PM

CAUTION: External Email. Proceed Responsibly.

Dear Supervisor Kuehl and Mr. Castro-Silva-

LA County has provided **false and misleading information** in the Notice of Completion of the Draft SEIR.

The notice describes the "Existing" Types of events to include

- Offer children's programs
- Schedule staff and public programming such as temporary exhibits, health and physical fitness activities, painting, wine, and cooking classes, etc.
- Institute subsidized musical performing arts programs and movie screenings
- Subject matter for events to be determined at the discretion of the Superintendent.

Anyone reading this notice would assume that the "Existing" types of events are authorized events. but in fact, a number of these, specifically "physical fitness activities, painting, wine and cooking classes, musical performing arts and movie screenings" go far beyond the scope of what was allowed in the 2014 SEIR.

The 2014 SEIR authorized the following events.

Public Programs to conform to new day/hours and number of participants allowed; however, subject matter for seminar/classes to be determined at the discretion of the Superintendent based on how well the classes interpret the historical collections at the facility. Also, include tours for biology, botany and horticulture groups.:

Also, note that the discretion of the Superintendent is not absolute, but in fact, based on **"how well the classes interpret the historical collections at the facility".**

Additionally, the Superintendent of the Gardens sent out a letter today, announcing a Special Event this Saturday. In her letter, she describes the Garden as offering

"Various educational activities including daily guided tours, lectures, Botanical illustration courses and field trips for schools."

111-1

Take a look at the Website and you will see that many other activities are offered which are completely unrelated to the Garden's mission- yoga, Book discussions on political history, LA architecture, the adventures of a Pan Am Flight Attendant, Art fakes, frauds and forgeries, Charlie Chaplin- all past events which are unrelated to the mission of the Gardens.

The Friends of the Robinson Gardens use this as their own private Country Club, instead of honoring the Gardens and preserving them. The new items proposed especially the 24 special events will really be for this select group of people, not the General Public, as required by the Grant Deed. This is not providing access.

The Gardens are currently operating outside the scope of the 2014 SEIR and the Grant Deed Bequest of Virginia Robinson.

The County should stop this unauthorized use and should provide correct and adequate information in the SEIR, not information that is false and misleading.

Thank you,

Kathy Checchi

111-1
cont.

Responses to Letter 111 – Kathy Checchi

Response to Comment 111-1:

The commenter opines that information provided on the website for the Virginia Robinson Gardens identifies a wide range of “unauthorized” event topics. This comment is noted.

This comment does not raise a specific environmental issue. However, it should be noted that it is within the purview of the County of Los Angeles to make a request to change the operational characteristics of the Virginia Robinson Gardens, which is the issue at hand. To do so, the County is requesting a discretionary action—an amendment to the existing operating Agreement between the County and Friends of Robinson Gardens. By way of discretionary action, the Los Angeles County Board of Supervisors will authorize the Director of the Department of Parks and Recreation to enter into an amended Support Agreement with the Friends of Robinson Gardens to reflect the operational changes approved by the Board. Formally, this amendment would consist of revising Section 4.05 of the Agreement to reflect the proposed changes to the operation of Virginia Robinson Gardens approved by the Board of Supervisors. All comments will be provided to decision-makers prior to consideration of the Proposed Project.

Letter 112 - Lesbia Trabanino - September 6, 2022

Dear Ms. Chien,

The Friends of the Robinson Gardens have submitted letters on behalf of the VRG and support of the proposed changes. I am opposed to the changes and feel that the comparison that the VRG draws to other Arboretums and Botanical Gardens is not valid.

1. Request to stay open until Sunset: Descanso Gardens is open until 7, South Coast Botanical Garden until 5, LA County Arboretum until 4:30 or 6:30 with shorter hours on the weekend. 112-1
2. Size and Facilities: The Descanso Gardens sits on 160 acres with 800 parking spaces and is bordered by a major highway and has a full café and catering on site with a metro train running through it. The VRG sits on 6 acres in a residential section, bordered only by private homes, has no food service available (everything must be brought in), has less than 35 parking spaces, and has no access to public transportation (bus is a 3-4 block walk, and nearest Metro will be Wilshire and Rodeo when completed). 112-2
3. The VRG compared themselves to The Wallis and to LACMA which are in a commercial/business zone and have major dedicated parking lots so that no one needs to park on neighboring streets. This is not the case with the VRG as they have gardeners and maintenance staff as well as office and event staff who would be presumable utilizing some of their "claimed" 35 spaces. 112-3
4. The VRG claims to need more hours so they can access more students. If the goal is education, then why are school tours only scheduled from 10-12:30 and limited to 42 students? Assuming a tour would be 90 minutes to 2 hours, why can't they do a second or third tour during the day? Schools try to leave a property in time to return students to school. Opening the park on Sundays would not increase the number of children's educational events. 112-4
5. The VRG is not a park. Parks are for recreation with hiking trails, walking paths, play equipment for children and dogs are allowed. The VRG is a series of winding paths through the property on uneven terrain and can only be accessed as part of organized tour (by reservation). 112-5
6. Special 24 events (up to 4 per month). This places an unreasonable burden on immediate neighbors and those on nearby streets as trucks must be brought in for catering, rentals, flowers, music, etc. The VRG is in the middle of a residential neighborhood with inadequate parking for larger events that require outside staff, valet, etc. Events with as many as one thousand guests would create a huge burden on traffic. Given the large fees for rentals, valet, permits, catering, etc., these special events would appeal only to corporate or wealthy individuals and thus doing nothing to increase inclusivity. 112-6

I look forward to seeing these issues addressed in the Final SEIR.

Sincerely,



Responses to Letter 112 – Lesbia Trabanino

Response to Comment 112-1:

Please refer to Response to Comment 99-1. This comment is noted.

Response to Comment 112-2:

Please refer to Response to Comment 99-2. This comment is noted.

Response to Comment 112-3:

Please refer to Response to Comment 99-3. This comment is noted.

Response to Comment 112-4:

Please refer to Response to Comment 99-4. This comment is noted.

Response to Comment 112-5:

Please refer to Response to Comment 99-5. This comment is noted.

Response to Comment 112-6:

Please refer to Response to Comment 99-6. This comment is noted.

Letter 113 - Ernesto Plaganas - September 6, 2022

Dear Ms. Chien-

We are writing to express our OPPOSITION to the proposed Operational Changes at the Virginia Robinson Gardens.

The County has said that the reason for these changes is to increase ACCESS.

We are completely in support of expanding the programs for School age children. That could be done Monday-Friday during the current hours.

We believe that the true beneficiaries of the 24 events will be the Friends of the Robinson Gardens. Already they use the Gardens as a private Country Club, offering events and classes to the small group of Friends.

Any events, such as a Wedding, would be very expensive to host. Unlike Descanso Gardens which has indoor facilities, tables and chairs and a dedicated catering facility- the Café- at Robinson Gardens, everything will need to be trucked in and out.

Tables, Chairs

Cooking and catering items

Sound system

Lighting

Dance Floor

Tent

In addition to all these items, there will be staff for set up and take down (all done in City streets, since the Garden has no loading dock). There will be staff for the event and Valet Parking attendants.

All of these items will be very expensive.

113-1

And how will the booking of events be determined. Unless there is an equitable and fair booking process, the people connected to the Garden will get granted access, not the public at large.

We believe the only way to be fair and provide access is to keep the Garden open to the public and not allow private parties. It is a Garden, not a commercial venue.

113-1
cont.

Thank you,

Responses to Letter 113 – Ernesto Plaganas

Response to Comment 113-1:

Thank you for your comment. The commenter opposes the proposed operational changes, stating that the additional Special Use Events would not increase public access to the Gardens. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 114 - Guity and Soly Melamed - September 6, 2022

By email jchien@parks.lacounty.gov

Dear Ms. Chien,

LA County is proposing major changes to the operations of the Virginia Robinsons Gardens. WE ARE OPPOSED TO THESE CHANGES.

The reason that the County gives is to give people more access to the Gardens, especially underserved youth through school programs.

This could easily be done during the current hours 9-4 Monday - Saturday. The County has been in charge of the Gardens for decades but does very few educational programs for school children. Why hasn't the County done more of these programs? Is it access or lack of outreach?

Also, none of the private parties proposed (24 a year, up to 4 a month) would increase access. These parties would be given by individuals who can afford to pay for valet parking, catering, lighting, dance floors, sound systems. How does this increase access? These events will also destroy the garden with setup, takedown and attendees walking through the Gardens.

We ask that the County define "access", create a specific plan to get school children to the Gardens and not create more inequity by these 24 private parties.

Thank you,

Guity & Soly Melamed
608 North Canon St.
B.H. CA 90210
Guity Melamed

114-1

Responses to Letter 114 – Guity and Soly Melamed

Response to Comment 114-1:

Thank you for your comment. The commenter opposes the operational changes and believes the Proposed Project would not provide intended benefits to the public. Please refer to Master Response 10. This comment is noted.

The commenter provides anecdotal information about the setup process for Special Use Events, stating that these events will “destroy the Garden.” This comment is noted.

Letter 115a - Janice Moreno - September 6, 2022

Dear Ms. Chien-

The LA County Parks and Recreation is proposing an expansion to the Virginia Robinson Gardens (the Gardens). Under their proposal, 73,000 people a year will come into our residential neighborhood and 24 events will be held. We already feel the impact of the 5,000 visitors a year and 4 events.

The County states their objectives as increasing equal access to the Gardens and for the Special Events, raising money for the Gardens.

These objectives could be fully accomplished without changing any of the operations at the Gardens.

We ask that the Final SEIR include an answer to the issues raised below.

INCREASED HOURS AT THE GARDENS

The County says that it would like to increase access to the Gardens. The neighbors fully support this objective, especially Garden tours for school age children. This objective could be accomplished within the current hours 9-4 Monday-Friday, since that is the time that school children would visit.

Why hasn't the County facilitated more of these school visits? They have run the Gardens since 1977, but according to the website only about 5% of their programming is for kids. Is it a matter of outreach? What has the County done on outreach?

The County says that keeping the Gardens open until sunset during the school year would allow parents to bring their children to the Gardens after school. Every parent knows that after school, kids need a snack and the ability to run around and exercise. The Gardens have no area for play structures or sports and no food service. There is a kid friendly parks very close- Coldwater Canyon Park. There is also Roxbury Park and Rancho Park, which has tennis courts, a golf course and playing fields. Descanso Gardens has a train and café.

The County proposes to have the Gardens open every day of the year until sunset, including Sundays and Holidays. Who will staff these increased hours? Currently, the Gardens are staffed by volunteers, but will volunteers be willing to give their time until 8 pm at night, on weekends and Holidays?

The County wants the Gardens open on Sundays and Holidays so that there is equal access, but the Gardens are currently open on Saturday. What are the numbers of people who come on Saturday? What area of the County do they come from? The County has years of data but provides none in the SEIR. There should be data in the final SEIR.

Increased hours do not automatically mean increased access.

THE SPECIAL EVENTS WILL RAISE MONEY FOR THE GARDENS

The County is proposing 24 Special Events, including Weddings, family ceremonies, etc. primarily to raise money for the Gardens.

The County does not disclose any financial information, projections or analysis to support that Special Events are profitable for them. By increasing the hours and increasing the number of Special Events there will be increased costs for staff which will offset any profits from renting out the Gardens. The

115a-1

115a-2

115a-3

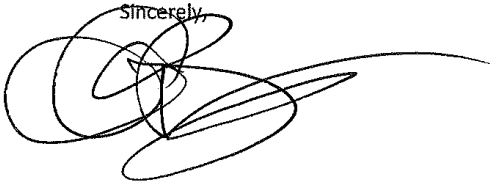
amount of money charged to rent out the Gardens can only be minimal, (maybe \$1,000-2,000) since there are no tables, chairs, catering facilities included in the cost. Most of the money for Special Events will be paid to the valet parkers, the caterers, and the rental companies. This nominal amount of rent could barely cover staff or wear and tear done by the Events.

The Gardens have recently started charging admission. \$15 for adults, \$11 students and \$6 for children (6-12). This could generate more income than hosting Special Events. Assuming 90% adults and 10% children, the 5,000 people who visited last year would have generated \$70,500 ($4,500 \times \$15 + 500 \times \6).

In conclusion, the objectives of the County could be fully accomplished without changing any of the operations at the Gardens. The Final SEIR needs to look carefully at the assumptions of the County that increasing the hours and number of Special Events at the Gardens does anything to increase access or to raise funds.

115a-3
cont.

Sincerely,

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

Responses to Letter 115a – Janice Moreno

Response to Comment 115a-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues. The commenter speculates that 73,000 people will visit the Gardens each year under the Proposed Project, and that the neighborhood already experiences negative impacts under current operating conditions. The commenter also argues that the Project objectives could be achieved without expanding operational hours. Please refer to Master Response 10. This comment is noted.

Response to Comment 115a-2:

The commenter states that the neighbors support increased programming for school children and that this objective could be accomplished within the current operating hours. The commenter surmises that only 5 percent of the Gardens' programs are for children. Additionally, the commenter states that the Gardens do not have play structures, sports equipment, or food service for children to use after school. As these comments are not direct comments on the content or adequacy of the Draft SEIR and do not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

All daily tours and events will continue to be run by adequate numbers of volunteers and staff. This comment is noted.

The commenter concludes by stating that expanded operational hours will not necessarily increase public access. Please refer to Master Response 10. This comment is noted.

Response to Comment 115a-3:

The commenter surmises that the Special Use Events will not raise sufficient funds for maintaining the Gardens. As this comment is not a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue, no further response is required. However, all comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 115b - Janice Moreno - September 6, 2022

Dear Ms. Chien-

We are writing to express our OPPOSITION to the proposed Operational Changes at the Virginia Robinson Gardens.

The County has said that the reason for these changes is to increase ACCESS.

We are completely in support of expanding the programs for School age children. That could be done Monday-Friday during the current hours.

We believe that the true beneficiaries of the 24 events will be the Friends of the Robinson Gardens. Already they use the Gardens as a private Country Club, offering events and classes to the small group of Friends.

Any events, such as a Wedding, would be very expensive to host. Unlike Descanso Gardens which has indoor facilities, tables and chairs and a dedicated catering facility- the Café- at Robinson Gardens, everything will need to be trucked in and out.

Tables, Chairs

Cooking and catering items

Sound system

Lighting

Dance Floor

Tent

In addition to all these items, there will be staff for set up and take down (all done in City streets, since the Garden has no loading dock). There will be staff for the event and Valet Parking attendants.

All of these items will be very expensive.

115b-1

And how will the booking of events be determined. Unless there is an equitable and fair booking process, the people connected to the Garden will get granted access, not the public at large.

We believe the only way to be fair and provide access is to keep the Garden open to the public and not allow private parties. It is a Garden, not a commercial venue.

115b-1
cont.

Thank you,



Janice Moreno

Responses to Letter 115b – Janice Moreno

Response to Comment 115b-1:

Please refer to Response to Comment 113-1. This comment is noted.

Letter 116 - Todd Barry - September 6, 2022

August 30, 2022

Via Email: jchien@parks.lacounty.gov

Ms. Jui Ing Chien
Park Planner
County of Los Angeles
Department of Parks and Recreation
1000 S. Fremont Ave.
Unit #40 A-9 West, 3rd Floor
Alhambra, California 91083

Re: Comments on Virginia Robinson Garden Expansion Plan

Dear Ms. Chien and to Whom It May Concern:

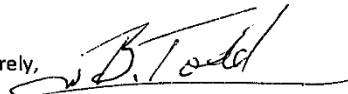
1. Save the Virginia Robinson Garden from risks of fire and damages by the Private parties and events; and provide a comprehensive plan to prevent such risks;
2. Preserve the Virginia Robinson Garden Estate from mass visitors and show how the docent-led programs will be added and performed to ensure the estate is not ruined and damaged;
3. Disclose the Students' educational programs and its historic data and all other programs and activities in order to ensure the Garden has been used properly;
4. Disclose the outreach efforts made to improve the students' educational programs to benefit more students from L.A. County and especially Title 1 Schools;
5. Show the transparency on the maintenance costs and Friends of Robinson Garden's accounting for donations received and its expenditures;
6. Show how the private parties will be booked and managed fairly without making the Estate an exclusive backyard for some connected people and provide a rationale for what makes this expansion a public benefit;
7. Listen to the neighborhoods to their concerns, and provide mitigation measures which will protect the neighborhood; and
8. Honor the original donor agreement, and provide an explanation of why L.A. County believes they can break the agreement.

116-1

116-2

116-3

Sincerely,



Barry Todd
Name

1121 SUMMIT DR B.H.C.A 90210
Address

Responses to Letter 116 – Todd Barry

Response to Comment 116-1:

Please refer to Response to Comment 83-1. This comment is noted.

Response to Comment 116-2:

Please refer to Response to Comment 83-2. This comment is noted.

Response to Comment 116-3:

Please refer to Response to Comment 83-3. This comment is noted.

Letter 117 - Scott Ewasko - September 6, 2022

Dear Ms. Chien,

We are vehemently opposed to the Virginia Robinson Gardens proposed changes to their operations.

While we are supportive of the Gardens mission, it should not come at our expense.

These changes are outrageous and threaten our right to the quiet enjoyment of our homes.

The Gardens already disregards the parking laws, and the Elden Way no parking restrictions. They allow visitors and event trucks to take over Elden Way on a regular basis despite that being prohibited, and routinely block resident driveways cutting off access to our homes.

There are times when emergency vehicles would not be able to get through. We do not want to have a tragedy occur because the Gardens were not interested in following safety protocols.

These proposed changes are alarming. They essentially change the Gardens into a commercial venue, and will completely ruin the fabric of our neighborhood.

In the face of resident opposition, the Gardens already expanded outside of their original scope in 2014. This cannot be allowed to happen again, and in fact, perhaps they should be forced to return to the prior original conditions.

While the current situation is bad enough, these changes significantly threaten our safety, our security, and our way of life.

We respectfully request that the County maintain the hours of the Garden as they are currently and keep the Special Events at 4.

Yours Sincerely,
Scott Ewasko



9/6/2022

117-1

Responses to Letter 117 – Scott Ewasko

Response to Comment 117-1:

Please refer to Response to Comment 54-1. This comment is noted.

Letter 118 - Scott Ewasko - September 6, 2022

Dear Ms. Chien-

The Virginia Robinson Gardens is located in a residential neighborhood, surrounded by houses on all sides. The only way to enter the Gardens is from a cul de sac on a residential street.

The County is proposing to increase the hours from 9-4 Monday through Saturday to 9- sunset every day of the week, including weekends and Holidays. In addition, the County proposes to open the Gardens to private events 24 times a year.

We are OPPOSED to these hours and private events for the following reasons.

-The traffic in our neighborhood is already very bad, and the Traffic Study was done in February of 2022, before many people returned to commuting to work.

-Other Gardens in the area are not located in residential areas and they have shorter hours. See the hours of Descanso Gardens, LA County Arboretum and Botanical Gardens, Mildred Mathias Botanical Garden and Robert Irwin Central Garden- most of these Gardens close by 5 pm on Saturday and Sunday.

-Staying open until Sunset is not manageable. Sunset is a specific time that changes each day, during the summer it is 7:30 or 8pm. But after sunset is twilight. A time of day where there is still light and that lasts another 60 minutes after that. Don't the neighbors and visitors to the Garden deserve an exact closing time?

-The Events will bring noise, traffic, parking problems and potentially crime to a residential neighborhood. These events will be private, not fundraisers for the Garden and people will attend for other reasons than touring the Garden. This will require increased police presence for parking enforcement and problems.

We ask that for the Final SEIR


-The traffic study be redone to reflect the current traffic.

-The hours be limited to conform to other Botanical Gardens, having a set time not sunset.

-The Events stay at the current 4 limit for fundraising, not be increased to include 24 Private Parties.

Sincerely,

Scott Ewasko



9/6/2022

118-1

118-2

Responses to Letter 118 – Scott Ewasko

Response to Comment 118-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues. This comment provides information on the environmental setting and summarizes the proposed operational changes. The commenter is opposed to the Proposed Project. This comment is noted.

Response to Comment 118-2:

The commenter states that the traffic count was conducted before many people returned to work after the COVID-19 pandemic. The traffic impact assessment is intended to provide data in support of the Draft SEIR. Therefore, the traffic counts were completed on February 3, 2022 prior to completion of the Draft SEIR in July 2022. Existing intersection vehicle turning movement volumes were collected during the peak periods of 7:00 a.m. to 9:00 a.m. and 4:00 pm to 6:00 p.m. Normal traffic activity was present at the time of the count, and schools were in session. This comment is noted.

Response to Comment 118-3:

This comment states that other public gardens close by 5 p.m. on Saturdays and Sundays. This comment is noted.

Response to Comment 118-4:

The commenter requests that the Gardens identify a specific closing time. This comment is noted.

Response to Comment 118-5:

This comment states that Special Use Events will bring additional noise, traffic congestion, parking issues, and police presence to the neighborhood. Noise impacts from the Proposed Project are discussed in Section 3.14, *Noise*, beginning on page 3-29 of the Draft SEIR. The County has also prepared a site-specific noise impact study, which is included as Appendix E of the Draft SEIR. Parking is discussed in Section 2.2.3, *Special Use Events*, on page 2-4 of the Draft SEIR and Section 2.4.5, *Parking*, beginning on page 3-29 of the Draft SEIR. Parking and traffic impacts associated with the Proposed Project are discussed in Section 4.18, *Transportation*, beginning on page 3-61 of the Draft SEIR. The County has also prepared a site-specific traffic impact assessment for the Proposed Project which is included as Appendix F of the Draft SEIR. Please refer to Master Response 1 through 6. Impacts to public services, including police protection, are discussed in Section 3.16 *Public Services* beginning on page 3-57 of the Draft SEIR. This comment is noted.

Response to Comment 118-6:

This comment requests that the traffic impact analysis be redone, that the proposed operational hours be modified, and that Special Use Events remain at 4 events per year. This comment is noted.

Letter 119 - Scott Ewasko - September 6, 2022

Dear Ms. Chien-

We are in favor of continuing and expanding the educational programs for Children at the Virginia Robinson Gardens, but we are strongly opposed to expanding the hours and permitting 24 private events.

The draft SEIR completely ignores the risk of Fire. The Final SEIR must take this important issue into account and retain the 4 private events instead of expanding them to 24.

Fire is ignored in the Draft SEIR. The SEIR states

"There has not been a wildland fire of any significance in Beverly Hills and the last large wildland fire adjacent to the city occurred in Franklin Canyon more than 50 years ago."

This is not true.

What about the Bel Air Fire of 1961, the Getty Fire of 2019 and the fire that occurred recently at 2040N Beverly Drive- less than a mile from the Gardens?

Our neighborhood was designated a Fire Hazard area and there are signs posted on many of our streets.

Also, with the water restrictions in place, our landscaping is drier than it has ever been.

Special Events will mean more people entering the Garden to set up since there are no catering facilities in the Garden. There will be cooking for food prep, lighting and sound system set up- all which could ignite a fire.

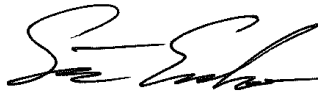
Firetrucks don't fit into the narrow walks of the Garden.

For all these reasons, the Special Events should be limited to 4.

As neighbors, we support the Gardens, but it is not fair or equitable to expose us to Fire risk for our own homes.

Sincerely,

Scott Ewasko



9/6/2022

119-1

Responses to Letter 119 – Scott Ewasko

Response to Comment 119-1:

Thank you for your comment. The commenter states that the Draft SEIR “completely ignores the risk of fire.” In fact, Project impacts related to wildfire are specifically discussed in Section 3.10, *Hazards and Hazardous Materials*, beginning on page 3-21 of the Draft SEIR and Section 3.21, *Wildfire*, beginning on page 3-77 of the Draft SEIR. Please refer to Master Response 6 and Master Response 7.

The commenter also states that the Draft SEIR fails to analyze for the 1961 Bel Air Fire and 2019 Getty Fire in the City of Los Angeles. The County recognizes that the Project Site is located within a Very High Fire Hazard Severity Zone, according to the California Department of Forestry and Fire Protection. While these specific wildfires were not referenced in the Draft SEIR, their inclusion would not change the Draft SEIR impact conclusion of less-than-significant. The Proposed Project would continue to comply with all applicable City codes and regulations pertaining to emergency response and evacuation plans maintained by the police and fire departments in the City of Beverly Hills. The County would coordinate with the Gardens staff and City of Beverly Hills to expedite evacuation in the event of a wildfire or other emergency event.

Letter 120 - Isaac Moradi - September 6, 2022

By email jchien@parks.lacounty.gov

Dear Ms. Chien,

LA County is proposing major changes to the operations of the Virginia Robinsons Gardens. WE ARE OPPOSED TO THESE CHANGES.


The reason that the County gives is to give people more access to the Gardens, especially underserved youth through school programs.

This could easily be done during the current hours 9-4 Monday - Saturday. The County has been in charge of the Gardens for decades but does very few educational programs for school children. Why hasn't the County done more of these programs? Is it access or lack of outreach?

Also, none of the private parties proposed (24 a year, up to 4 a month) would increase access. These parties would be given by individuals who can afford to pay for valet parking, catering, lighting, dance floors, sound systems. How does this increase access? These events will also destroy the garden with setup, takedown and attendees walking through the Gardens.

We ask that the County define "access", create a specific plan to get school children to the Gardens and not create more inequity by these 24 private parties.

Thank you,

ISAAC MORADI
1859 N Hillcrest DR
Beverly Hills CA 90210


120-1

Responses to Letter 120 – Isaac Moradi

Response to Comment 120-1:

Please refer to Response to Comment 114-1. This comment is noted.

Letter 121- Jacqueline Moradi - September 6, 2022

jchien@parks.lacounty.gov

Dear Ms. Chien-

We are in favor of continuing and expanding the educational programs for Children at the Virginia Robinson Gardens, but we are strongly opposed to expanding the hours and permitting 24 private events.

The draft SEIR completely ignores the risk of Fire. The Final SEIR must take this important issue into account and retain the 4 private events instead of expanding them to 24.

Fire is ignored in the Draft SEIR. The SEIR states

"There has not been a wildland fire of any significance in Beverly Hills and the last large wildland fire adjacent to the city occurred in Franklin Canyon more than 50 years ago."

This is not true.

What about the Bel Air Fire of 1961, the Getty Fire of 2019 and the fire that occurred recently at 2040N Beverly Drive- less than a mile from the Gardens?

Our neighborhood was designated a Fire Hazard area and there are signs posted on many of our streets.

Also, with the water restrictions in place, our landscaping is drier than it has ever been.


Special Events will mean more people entering the Garden to set up since there are no catering facilities in the Garden. There will be cooking for food prep, lighting and sound system set up- all which could ignite a fire.

Firetrucks don't fit into the narrow walks of the Garden.

For all these reasons, the Special Events should be limited to 4.

As neighbors, we support the Gardens, but it is not fair or equitable to expose us to Fire risk for our own homes.

Sincerely,

JACQUILINE MORADI
1859 N. Hillcrest, DR 
Beverly Hills ca 90210

121-1

Responses to Letter 121 – Jacqueline Moradi

Response to Comment 121-1:

Please refer to Response to Comment 119-1. This comment is noted.

Letter 122 - Roxanne Heptner - September 6, 2022

Dear Ms. Chien,

The Friends of the Robinson Gardens have submitted letters on behalf of the VRG and support of the proposed changes. I am opposed to the changes and feel that the comparison that the VRG draws to other Arboretums and Botanical Gardens is not valid.

1. Request to stay open until Sunset: Descanso Gardens is open until 7, South Coast Botanical Garden until 5, LA County Arboretum until 4:30 or 6:30 with shorter hours on the weekend.
2. Size and Facilities: The Descanso Gardens sits on 160 acres with 800 parking spaces and is bordered by a major highway and has a full café and catering on site with a metro train running through it. The VRG sits on 6 acres in a residential section, bordered only by private homes, has no food service available (everything must be brought in), has less than 35 parking spaces, and has no access to public transportation (bus is a 3-4 block walk, and nearest Metro will be Wilshire and Rodeo when completed).
3. The VRG compared themselves to The Wallis and to LACMA which are in a commercial/business zone and have major dedicated parking lots so that no one needs to park on neighboring streets. This is not the case with the VRG as they have gardeners and maintenance staff as well as office and event staff who would be presumable utilizing some of their "claimed" 35 spaces.
4. The VRG claims to need more hours so they can access more students. If the goal is education, then why are school tours only scheduled from 10-12:30 and limited to 42 students? Assuming a tour would be 90 minutes to 2 hours, why can't they do a second or third tour during the day? Schools try to leave a property in time to return students to school. Opening the park on Sundays would not increase the number of children's educational events.
5. The VRG is not a park. Parks are for recreation with hiking trails, walking paths, play equipment for children and dogs are allowed. The VRG is a series of winding paths through the property on uneven terrain and can only be accessed as part of organized tour (by reservation).
6. Special 24 events (up to 4 per month). This places an unreasonable burden on immediate neighbors and those on nearby streets as trucks must be brought in for catering, rentals, flowers, music, etc. The VRG is in the middle of a residential neighborhood with inadequate parking for larger events that require outside staff, valet, etc. Events with as many as one thousand guests would create a huge burden on traffic. Given the large fees for rentals, valet, permits, catering, etc., these special events would appeal only to corporate or wealthy individuals and thus doing nothing to increase inclusivity.

I look forward to seeing these issues addressed in the Final SEIR.

Sincerely,

Roxanne Heptner

122-1

122-2

122-3

122-4

122-5

122-6

Responses to Letter 122 – Roxanne Heptner

Response to Comment 122-1:

Please refer to Response to Comment 99-1. This comment is noted.

Response to Comment 122-2:

Please refer to Response to Comment 99-2. This comment is noted.

Response to Comment 122-3:

Please refer to Response to Comment 99-3. This comment is noted.

Response to Comment 122-4:

Please refer to Response to Comment 99-4. This comment is noted.

Response to Comment 122-5:

Please refer to Response to Comment 99-5. This comment is noted.

Response to Comment 122-6:

Please refer to Response to Comment 99-6. This comment is noted.

Letter 123 - Shahrzad Shamsi - September 6, 2022

jchien@parks.lacounty.gov

Dear Ms. Chien-

We are in favor of continuing and expanding the educational programs for Children at the Virginia Robinson Gardens, but we are strongly opposed to expanding the hours and permitting 24 private events.

The draft SEIR completely ignores the risk of Fire. The Final SEIR must take this important issue into account and retain the 4 private events instead of expanding them to 24.

Fire is ignored in the Draft SEIR. The SEIR states

"There has not been a wildland fire of any significance in Beverly Hills and the last large wildland fire adjacent to the city occurred in Franklin Canyon more than 50 years ago."

This is not true.

What about the Bel Air Fire of 1961, the Getty Fire of 2019 and the fire that occurred recently at 2040N Beverly Drive- less than a mile from the Gardens?

Our neighborhood was designated a Fire Hazard area and there are signs posted on many of our streets.

Also, with the water restrictions in place, our landscaping is drier than it has ever been.

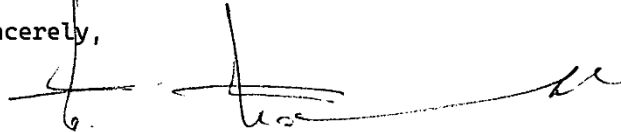
Special Events will mean more people entering the Garden to set up since there are no catering facilities in the Garden. There will be cooking for food prep, lighting and sound system set up- all which could ignite a fire.

Firetrucks don't fit into the narrow walks of the Garden.

For all these reasons, the Special Events should be limited to 4.

As neighbors, we support the Gardens, but it is not fair or equitable to expose us to Fire risk for our own homes.

Sincerely,



SHAHRAZAD SHAMSI

9309 OLYMPIC BLVD BEVERLY HILLS, CA, 90212

123-1

Responses to Letter 123 – Shahrzad Shamsi

Response to Comment 123-1:

Please refer to Response to Comment 119-1. This comment is noted.

Letter 124 - Radi Shamsi - September 6, 2022

Dear Ms. Chien,

We are vehemently opposed to the Virginia Robinson Gardens proposed changes to their operations.

While we are supportive of the Gardens mission, it should not come at our expense.

Whatever the findings of the Supplemental Environmental Report that is being prepared shows, these changes are outrageous and threaten our right to the quiet enjoyment of our homes.

The Gardens already disregards the parking laws, and the Elden Way no parking restrictions. They allow visitors and event trucks to take over Elden Way on a regular basis despite that being prohibited, and routinely block resident driveways cutting off access to our homes.

There are times when emergency vehicles would not be able to get through. We do not want to have a tragedy occur because the Gardens were not interested in following safety protocols.

These proposed changes are alarming. They essentially change the Gardens into a commercial venue, and will completely ruin the fabric of our neighborhood.

In the face of resident opposition, the Gardens already expanded outside of their original scope in 2014. This cannot be allowed to happen again.

While the current situation is bad enough, these changes significantly threaten our safety, our security, and our way of life.

We respectfully request that the County and Gardens abandon their pursuit of this expansion.

Yours Sincerely,

SHAHRAD (RADI) SHAMSI

R. Shamsi
9307 OLYMPIC BLVD BEVERLY HILLS Ca, 90212

124-1

Responses to Letter 124 – Radi Shamsi

Response to Comment 124-1:

Please refer to Response to Comment 54-1. This comment is noted.

Letter 125 - Medhi Bolour - September 6, 2022

August 30, 2022

Via Email: jchien@parks.lacounty.gov

Ms. Jui Ing Chien
Park Planner
County of Los Angeles
Department of Parks and Recreation
1000 S. Fremont Ave.
Unit #40 A-9 West, 3rd Floor
Alhambra, California 91083

Re: Comments on Virginia Robinson Garden Expansion Plan

Dear Ms. Chien and to Whom It May Concern:

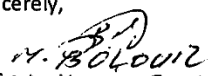
1. Save the Virginia Robinson Garden from risks of fire and damages by the Private parties and events; and provide a comprehensive plan to prevent such risks;
2. Preserve the Virginia Robinson Garden Estate from mass visitors and show how the docent-led programs will be added and performed to ensure the estate is not ruined and damaged;
3. Disclose the Students' educational programs and its historic data and all other programs and activities in order to ensure the Garden has been used properly;
4. Disclose the outreach efforts made to improve the students' educational programs to benefit more students from L.A. County and especially Title 1 Schools;
5. Show the transparency on the maintenance costs and Friends of Robinson Garden's accounting for donations received and its expenditures;
6. Show how the private parties will be booked and managed fairly without making the Estate an exclusive backyard for some connected people and provide a rationale for what makes this expansion a public benefit;
7. Listen to the neighborhoods to their concerns, and provide mitigation measures which will protect the neighborhood; and
8. Honor the original donor agreement, and provide an explanation of why L.A. County believes they can break the agreement.

125-1

125-2

125-3

Sincerely,


MEDHI BOLOUR 1020 LOUIRE WAY 90210 BEVERLY *THIBS*
Name Address

Responses to Letter 125 – Medhi Bolour

Response to Comment 125-1:

Please see Response to Comment 83-1. This comment is noted.

Response to Comment 125-2:

Please see Response to Comment 83-2. This comment is noted.

Response to Comment 125-3:

Please see Response to Comment 83-3. This comment is noted.

Letter 126 - Medhi Bolour - September 6, 2022

Dear Ms. Chien,

We are vehemently opposed to the Virginia Robinson Gardens proposed changes to their operations.

While we are supportive of the Gardens mission, it should not come at our expense.

Whatever the findings of the Supplemental Environmental Report that is being prepared shows, these changes are outrageous and threaten our right to the quiet enjoyment of our homes.

The Gardens already disregards the parking laws, and the Elden Way no parking restrictions. They allow visitors and event trucks to take over Elden Way on a regular basis despite that being prohibited, and routinely block resident driveways cutting off access to our homes.

There are times when emergency vehicles would not be able to get through. We do not want to have a tragedy occur because the Gardens were not interested in following safety protocols.

These proposed changes are alarming. They essentially change the Gardens into a commercial venue, and will completely ruin the fabric of our neighborhood.

In the face of resident opposition, the Gardens already expanded outside of their original scope in 2014. This cannot be allowed to happen again.

While the current situation is bad enough, these changes significantly threaten our safety, our security, and our way of life.

We respectfully request that the County and Gardens abandon their pursuit of this expansion.


Yours Sincerely,

600 DOHENY ROAD BEVERLY HILLS 90210 M. BOLOUR
TRUST NO 3 MEDHI BOLOUR TRUST OF TRUST NO
3

126-1

Responses to Letter 126 – Medhi Bolour

Response to Comment 126-1:

Please refer to Response to Comment 54-1. This comment is noted.

Letter 127- Elena and Jack Rochel - September 6, 2022

August 30, 2022

Via Email: ichien@parks.lacounty.gov

Ms. Jui Ing Chien
Park Planner
County of Los Angeles
Department of Parks and Recreation
1000 S. Fremont Ave.
Unit #40 A-9 West, 3rd Floor
Alhambra, California 91083

Re: Comments on Virginia Robinson Garden Expansion Plan

Dear Ms. Chien and to Whom It May Concern:


1. Save the Virginia Robinson Garden from risks of fire and damages by the Private parties and events; and provide a comprehensive plan to prevent such risks;
2. Preserve the Virginia Robinson Garden Estate from mass visitors and show how the docent-led programs will be added and performed to ensure the estate is not ruined and damaged;
3. Disclose the Students' educational programs and its historic data and all other programs and activities in order to ensure the Garden has been used properly;
4. Disclose the outreach efforts made to improve the students' educational programs to benefit more students from L.A. County and especially Title 1 Schools;
5. Show the transparency on the maintenance costs and Friends of Robinson Garden's accounting for donations received and its expenditures;
6. Show how the private parties will be booked and managed fairly without making the Estate an exclusive backyard for some connected people and provide a rationale for what makes this expansion a public benefit;
7. Listen to the neighborhoods to their concerns, and provide mitigation measures which will protect the neighborhood; and
8. Honor the original donor agreement, and provide an explanation of why L.A. County believes they can break the agreement.

127-1

127-2

127-3

Sincerely,


Name Address BH 0490210

Responses to Letter 127 – Elena and Jack Rochel

Response to Comment 127-1:

Please refer to Response to Comment 83-1. This comment is noted.

Response to Comment 127-2:

Please refer to Response to Comment 83-2. This comment is noted.

Response to Comment 127-3:

Please refer to Response to Comment 83-3. This comment is noted.

Letter 128 - Sheryl Lynn Haymon - September 6, 2022

Dear Ms. Chien,

The hours the County is proposing for the Robinson Gardens are **excessive**, especially if you consider that the VRG is in a residential area, surrounded on all sides by private homes.

None of the other Gardens are open until Sunset. Sunset during the summer can be as late as 7:30 or 8 pm and that is when the sun sets. Then there is a period of twilight when it is still light.

Virginia Robinson Gardens

Size	6 acres
Hours	Currently 9-4 Monday-Saturday/ Proposed 9-
sunset Every Day	
Parking	35 spaces
Surrounding area	completely residential on all sides
Hosted events	currently 4/ Proposed 24

128-1

To have an event at the VRG, it must be outside and everything needs to be trucked in by delivery trucks- tables, chairs, a tent, cooking facilities, lighting, sound system dance floor and even restrooms, since during the large events, the house is closed. All these trucks must unload in the Elden Way Cul de sac since large trucks don't fit in the driveway of the VRG.

The effect of bringing in all of these rental trucks and facilities to the Garden will be to destroy the Garden.

The County compares the VRG to Descanso Gardens but that's not an accurate comparison because Descanso is much larger, has ample free parking and its own food service, multiple indoor facilities, and restrooms.

Descanso Gardens

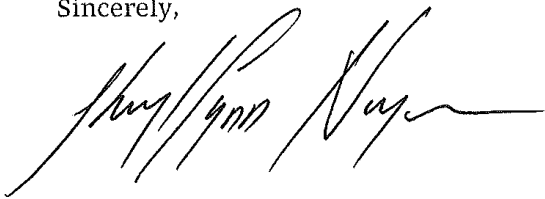
Size	150 acres
Hours	Mon-Friday 9-7 summer, 9-5 winter Sat/Sunday 9-5
Parking	800 spaces
Surrounding Area	Major highway on one border, residential on others
Hosted Events	Yes, but requirement to use the Descanso Café for all catering

128-1
cont.

The VRG should be compared to similar smaller botanical gardens.

Please make the Gardens comparable hours to other Gardens and keep the Special Events at 4.

Sincerely,



Responses to Letter 128 – Sheryl Lynn Haymon

Response to Comment 128-1:

Thank you for your comment. The commenter states that the proposed operational changes are “excessive” and that Special Use Events will “destroy the Garden.” The commenter also provides anecdotal information about the setup process for Special Use Events. This comment is noted.

Regarding the Gardens’ need for extended hours, please refer to Master Response 10.

Letter 129 - Saul Berman - September 6, 2022

Dear Ms. Chien,

The hours the County is proposing for the Robinson Gardens are excessive, especially if you consider that the VRG is in a residential area, surrounded on all sides by private homes.

None of the other Gardens are open until Sunset. Sunset during the summer can be as late as 7:30 or 8 pm and that is when the sun sets. Then there is a period of twilight when it is still light.

Virginia Robinson Gardens

Size	6 acres
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sunset Every Day	
Parking	35 spaces
Surrounding area	completely residential on all sides
Hosted events	currently 4/ Proposed 24

129-1

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The effect of bringing in all of these rental trucks and facilities to the Garden will be to destroy the Garden.

The County compares the VRG to Descanso Gardens but that's not an accurate comparison because Descanso is much larger, has ample free parking and its own food service, multiple indoor facilities, and restrooms.

Descanso Gardens

Size	150 acres
Hours	Mon-Friday 9-7 summer, 9-5 winter Sat/Sunday 9-5
Parking	800 spaces
Surrounding Area	Major highway on one border, residential on others
Hosted Events	Yes, but requirement to use the Descanso Café for all catering

The VRG should be compared to similar smaller botanical gardens.

Please make the Gardens comparable hours to other Gardens and keep the Special Events at 4.

Sincerely,



129-1
cont.

Responses to Letter 129 – Saul Berman

Response to Comment 129-1:

Please refer to Response to Comment 128-1. This comment is noted.

Responses to Letter 130 – Shahnaz Nassir

Response to Comment 130-1:

Please refer to Response to Comment 83-1. This comment is noted.

Response to Comment 130-2:

Please refer to Response to Comment 83-2. This comment is noted.

Response to Comment 130-3:

Please refer to Response to Comment 83-3. This comment is noted.

Letter 131 - Victor Felix - September 6, 2022

Dear Ms. Chien-

The LA County Parks and Recreation is proposing an expansion to the Virginia Robinson Gardens (the Gardens). Under their proposal, 73,000 people a year will come into our residential neighborhood and 24 events will be held. We already feel the impact of the 5,000 visitors a year and 4 events.

The County states their objectives as increasing equal access to the Gardens and for the Special Events, raising money for the Gardens.

These objectives could be fully accomplished without changing any of the operations at the Gardens.

We ask that the Final SEIR include an answer to the issues raised below.

INCREASED HOURS AT THE GARDENS

The County says that it would like to increase access to the Gardens. The neighbors fully support this objective, especially Garden tours for school age children. This objective could be accomplished within the current hours 9-4 Monday-Friday, since that is the time that school children would visit.

Why hasn't the County facilitated more of these school visits? They have run the Gardens since 1977, but according to the website only about 5% of their programming is for kids. Is it a matter of outreach? What has the County done on outreach?

The County says that keeping the Gardens open until sunset during the school year would allow parents to bring their children to the Gardens after school. Every parent knows that after school, kids need a snack and the ability to run around and exercise. The Gardens have no area for play structures or sports and no food service. There is a kid friendly parks very close- Coldwater Canyon Park. There is also Roxbury Park and Rancho Park, which has tennis courts, a golf course and playing fields. Descanso Gardens has a train and café.

The County proposes to have the Gardens open every day of the year until sunset, including Sundays and Holidays. Who will staff these increased hours? Currently, the Gardens are staffed by volunteers, but will volunteers be willing to give their time until 8 pm at night, on weekends and Holidays?

The County wants the Gardens open on Sundays and Holidays so that there is equal access, but the Gardens are currently open on Saturday. What are the numbers of people who come on Saturday? What area of the County do they come from? The County has years of data but provides none in the SEIR. There should be data in the final SEIR.

Increased hours do not automatically mean increased access.

THE SPECIAL EVENTS WILL RAISE MONEY FOR THE GARDENS

The County is proposing 24 Special Events, including Weddings, family ceremonies, etc. primarily to raise money for the Gardens.

The County does not disclose any financial information, projections or analysis to support that Special Events are profitable for them. By increasing the hours and increasing the number of Special Events there will be increased costs for staff which will offset any profits from renting out the Gardens. The

131-1

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131-3

amount of money charged to rent out the Gardens can only be minimal, (maybe \$1,000-2,000) since there are no tables, chairs, catering facilities included in the cost. Most of the money for Special Events will be paid to the valet parkers, the caterers, and the rental companies. This nominal amount of rent could barely cover staff or wear and tear done by the Events.

The Gardens have recently started charging admission. \$15 for adults, \$11 students and \$6 for children (6-12). This could generate more income than hosting Special Events. Assuming 90% adults and 10% children, the 5,000 people who visited last year would have generated \$70,500 ($4,500 \times \$15 + 500 \times \6).

In conclusion, the objectives of the County could be fully accomplished without changing any of the operations at the Gardens. The Final SEIR needs to look carefully at the assumptions of the County that increasing the hours and number of Special Events at the Gardens does anything to increase access or to raise funds.

Sincerely,



131-3
cont.

Responses to Letter 131 – Victor Felix

Response to Comment 131-1:

Please refer to Response to Comment 115a-1. This comment is noted.

Response to Comment 131-2:

Please refer to Response to Comment 115a-2. This comment is noted.

Response to Comment 131-3:

Please refer to Response to Comment 115a-3. This comment is noted.

Letter 132 - Sandra Goldfarb - September 6, 2022

By email jchien@parks.lacounty.gov

Ms. Chien,

We strongly OPPOSE changing the operations of the Virginia Robinsons Gardens.

While we are supportive of the Gardens mission, the changes proposed will adversely affect our neighborhood and threaten our right to the quiet enjoyment of our homes.

The Gardens already disregards the parking laws, and increasing the number of events from 4 to 24 will have a major negative impact on the traffic and parking situation in our neighborhood.

There are times when emergency vehicles would not be able to get through. We do not want a tragedy to occur because the Gardens were not interested in following safety protocols.

Adding Weddings, family celebrations will essentially change the Garden into a commercial venue. The noise from these events alone will disrupt the peaceful nature of our neighborhood.

The Draft SEIR does not answer any of our concerns. Alternatives should be fully considered.

There can be expanded access without ruining our neighborhood.

Thank you,

Sandra Goldfarb
919 Crescent Drive
Beverly Hills

132-1

Responses to Letter 132 – Sandra Goldfarb

Response to Comment 132-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues. The commenter states opposition to the Project citing traffic, parking, emergency access concerns. Please refer to Master Response 1 through Master Response 6, and Master Response 10.

Letter 133 - Kym Pereira - September 6, 2022

Dear Ms. Chien-

We are in favor of continuing and expanding the educational programs for Children at the Virginia Robinson Gardens, but we are strongly opposed to expanding the hours and permitting 24 private events.

The draft SEIR completely ignores the risk of Fire. The Final SEIR must take this important issue into account and retain the 4 private events instead of expanding them to 24.

Fire is ignored in the Draft SEIR. The SEIR states

"There has not been a wildland fire of any significance in Beverly Hills and the last large wildland fire adjacent to the city occurred in Franklin Canyon more than 50 years ago."

This is not true.

What about the Bel Air Fire of 1961, the Getty Fire of 2019 and the fire that occurred recently at 2040N Beverly Drive- less than a mile from the Gardens?

Our neighborhood was designated a Fire Hazard area and there are signs posted on many of our streets.

Also, with the water restrictions in place, our landscaping is drier than it has ever been.

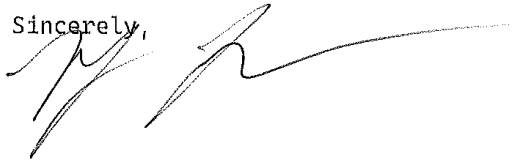
Special Events will mean more people entering the Garden to set up since there are no catering facilities in the Garden. There will be cooking for food prep, lighting and sound system set up- all which could ignite a fire.

Firetrucks don't fit into the narrow walks of the Garden.

For all these reasons, the Special Events should be limited to 4.

As neighbors, we support the Gardens, but it is not fair or equitable to expose us to Fire risk for our own homes.

Sincerely,



133-1

Responses to Letter 133 – Kim Pereira

Response to Comment 133-1:

Please refer to Response to Comment 119-1. This comment is noted.

Letter 134 - Kym Pereira - September 6, 2022

Dear Ms. Chien,

LA County is proposing a change the operations of the Virginia Robinsons Gardens.

We are supportive of the non-profit educational programs at the Garden, but the new changes are significant in number and purpose

Increase the visitors to 200 visitors a day
Increase the days to every day, including all Holidays
Increase the hours until sunset
Increase the special events to 24 events a year, up to 4 a month

These changes will adversely impact our neighborhood with:

Noise- especially evening events such as Weddings
Parking on the streets
Traffic in the neighborhood

Presently, we have a very quiet neighborhood. These changes will disturb the peace and quiet of our neighborhood.

Also, bringing catering items, dance floors, tables and chairs and setting them up in the Garden will harm and garden. Mrs. Robinson specifically left the Garden as "an arboretum or botanical garden" and stated

"No business for profit shall every be conducted on said property but the same shall at all reasonable times be open and available for the benefit and enjoyment of the general public as an arboretum garden."

Please help us protect the Garden and our neighborhood.

Thank you,



134-1

Responses to Letter 134 – Kim Pereira

Response to Comment 134-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues. The commenter states opposition to the Project citing concerns for noise, traffic, parking, and damage to the Gardens. Please refer to Master Response 1 through 6, and Master Response 8 through 10.

Letter 135 - Sabrena Russell - September 6, 2022

Dear Ms. Chien-

The LA County Parks and Recreation is proposing an expansion to the Virginia Robinson Gardens (the Gardens). Under their proposal, 73,000 people a year will come into our residential neighborhood and 24 events will be held. We already feel the impact of the 5,000 visitors a year and 4 events.

The County states their objectives as increasing equal access to the Gardens and for the Special Events, raising money for the Gardens.

These objectives could be fully accomplished without changing any of the operations at the Gardens.

We ask that the Final SEIR include an answer to the issues raised below.

INCREASED HOURS AT THE GARDENS

The County says that it would like to increase access to the Gardens. The neighbors fully support this objective, especially Garden tours for school age children. This objective could be accomplished within the current hours 9-4 Monday-Friday, since that is the time that school children would visit.

Why hasn't the County facilitated more of these school visits? They have run the Gardens since 1977, but according to the website only about 5% of their programming is for kids. Is it a matter of outreach? What has the County done on outreach?

The County says that keeping the Gardens open until sunset during the school year would allow parents to bring their children to the Gardens after school. Every parent knows that after school, kids need a snack and the ability to run around and exercise. The Gardens have no area for play structures or sports and no food service. There is a kid friendly parks very close- Coldwater Canyon Park. There is also Roxbury Park and Rancho Park, which has tennis courts, a golf course and playing fields. Descanso Gardens has a train and café.

The County proposes to have the Gardens open every day of the year until sunset, including Sundays and Holidays. Who will staff these increased hours? Currently, the Gardens are staffed by volunteers, but will volunteers be willing to give their time until 8 pm at night, on weekends and Holidays?

The County wants the Gardens open on Sundays and Holidays so that there is equal access, but the Gardens are currently open on Saturday. What are the numbers of people who come on Saturday? What area of the County do they come from? The County has years of data but provides none in the SEIR. There should be data in the final SEIR.

Increased hours do not automatically mean increased access.

THE SPECIAL EVENTS WILL RAISE MONEY FOR THE GARDENS

The County is proposing 24 Special Events, including Weddings, family ceremonies, etc. primarily to raise money for the Gardens.

The County does not disclose any financial information, projections or analysis to support that Special Events are profitable for them. By increasing the hours and increasing the number of Special Events there will be increased costs for staff which will offset any profits from renting out the Gardens. The

135-1

135-2

135-3

amount of money charged to rent out the Gardens can only be minimal, (maybe \$1,000-2,000) since there are no tables, chairs, catering facilities included in the cost. Most of the money for Special Events will be paid to the valet parkers, the caterers, and the rental companies. This nominal amount of rent could barely cover staff or wear and tear done by the Events.

The Gardens have recently started charging admission. \$15 for adults, \$11 students and \$6 for children (6-12). This could generate more income than hosting Special Events. Assuming 90% adults and 10% children, the 5,000 people who visited last year would have generated \$70,500 ($4,500 \times \$15 + 500 \times \6).

In conclusion, the objectives of the County could be fully accomplished without changing any of the operations at the Gardens. The Final SEIR needs to look carefully at the assumptions of the County that increasing the hours and number of Special Events at the Gardens does anything to increase access or to raise funds.

Sincerely,



135-3
cont.

Responses to Letter 135 – Sabrina Russell

Response to Comment 135-1:

Please refer to Response to Comment 115a-1. This comment is noted.

Response to Comment 135-2:

Please refer to Response to Comment 115a-2. This comment is noted.

Response to Comment 135-3:

Please refer to Response to Comment 115a-3. This comment is noted.

Letter 136 - Bella Bernard - September 6, 2022

From: [bella.bernard](#)
To: [Jui Ing Chien](#)
Date: Tuesday, September 6, 2022 4:00:07 PM

CAUTION: External Email. Proceed Responsibly.

Please include my name on the list of people to stop expansion of Virginia Robinson Gardens.
Thank you.

Bella Bernard

Sent from my iPhone

136-1

Responses to Letter 136 – Bella Bernard

Response to Comment 136-1:

The commenter expresses opposition to the Proposed Project. This comment is noted.

Letter 137 - Kathy Checchi and Masud Hakim - September 6, 2022

Dear Ms. Chien-

The Operational Changes that LA County is proposing to the Virginia Robinson Gardens are **completely contrary** to the intent of the original Donor, Mrs. Virginia Robinson, and the 2014 SEIR.

Donor's Intent

When Mrs. Robinson deeded the Garden to LA County it was for a very specific purpose. It was to be used as "an arboretum or botanical garden and for no other purpose inconsistent with said use."

Mrs. Robinson specifically provided that

"No business for profit shall ever be conducted on said property but the same shall at all times be open and available for the benefit and enjoyment of the general public as an arboretum."

In fact, Mrs. Robinson felt so strongly about this use that she provided that if the provisions of the Grant Deed were breached or violated "title to the whole of said real property shall immediately vest in the City of Beverly Hills."

2014 SEIR

Likewise, the 2014 SEIR limited the way in which the Gardens could be used.

"Public Programs to conform to new day/hours and number of participants allowed; however, subject matter for seminar/classes to be determined at the discretion of the Superintendent based on how well the classes interpret the historical collections at the facility. Also, include tours for biology, botany and horticulture groups."

These are very specific programs geared toward the historical collections at the Gardens and the subject matter which relates to the Gardens.

Likewise, the Special Uses were very specific.

Special Uses limited to four (4) per year with expanded theme to include, but not limited to:

- **Extend Garden Tour to two consecutive days to allow greater overall attendance**

137-1

- Offer public tour in the evening with a meal served with or without tables
- Offer public tour for donors during daylight hours featuring seasonal aspects of the garden or recent restoration projects.
- Offer performing arts in the garden, such as classical music, theatre or poetry readings

For special uses, theme would be determined at the discretion of the Superintendent.
Programs must continue to focus on the historical interpretation of the facility, such as the non-living and living collections housed at the facility, the gardens, etc.

-

Current Draft SEIR

The current SEIR completely disregards the Donor's intent AND the prior uses specified by the 2014 SEIR. LA County now seeks to essentially turn the Gardens into a commercial enterprise, renting out the Gardens for Weddings, and other private parties.

The Revised Notice from the County incorrectly describes the existing types of Events to include

- Offer children's programs
- Schedule staff and public programming such as temporary exhibits, health and physical fitness activities, painting, wine, and cooking classes, etc.
- Institute subsidized musical performing arts programs and movie screenings
- Subject matter for events to be determined at the discretion of the Superintendent.

Additionally, for the County to describe these as "existing events" **is actually false and misleading. Any person reading this notice would think that these events are authorized.**

This is definitely a larger scope of activities than is described in the 2014 SEIR. Why doesn't this match the language of the 2014 SEIR? Because the Friends of the Robinson Garden are already violating the provisions of the Grant Deed and the 2014 SEIR. They use this Garden as their own private Country Club instead of honoring the Gardens and preserving them. Take a look at the Website and you will see that many other activities are offered which are completely unrelated to the Garden's mission- yoga, book clubs on history, LA architecture, the

137-1
cont.

experiences of a Pan Am flight Attendant, Art fakes, frauds and forgeries- all unrelated to the mission of the Gardens.

The Friends are currently operating the Gardens outside the scope of the 2014 SEIR and the Grant Deed of Virginia Robinson. The new items proposed, especially the 24 Special Use events will really be for this select group of people, not the General Public, as required by the Grant Deed.

Why is the County allowing this unauthorized use?

The Donor and the 2014 SEIR recognized the limitations of the facility. It is a Garden, not a commercial venue. The new events described in the Draft SEIR will do damage to the Gardens because there are no catering facilities, tables, chairs, dance floor, lighting- all these items will need to be trucked into the Gardens. The wear and tear on the Gardens will adversely affect the Gardens.

Currently, the Garden hosts 5,000 people a year or about 20 people a day. Under the Draft SEIR, there will be 73,000 people a year PLUS unlimited guests for 24 separate events. Again, the Gardens cannot sustain this much traffic.

We ask the County to look at the Donor Intent and the current SEIR. The County should be required to give accurate and truthful information in its Notice. The County should honor the Donor's intent, preserve the Gardens and not put them at risk If the County can't do this, they should turn the Gardens over to the City of Beverly Hills.

Sincerely,

Masud Hakim 1006 Elden Way

Kathy and Al Checchi 1007 Cove Way

137-1
cont.

Responses to Letter 137 – Kathy Checchi and Masud Hakim

Response to Comment 137-1:

The commenter states that the proposed operational changes are contrary to the intent of Mrs. Virginia Robinson’s bequest. The commenter argues that the Gardens host a wide range of “unauthorized” event topics. This comment is noted. An EIR may incorporate portions or all of any publicly available document by reference (CEQA Guidelines Section 15150). The Draft SEIR, where applicable, incorporated by reference the certified *2014 SEIR Proposed Operational Changes to the Virginia Robinson Gardens* (County of Los Angeles 2012; 2014a; 2014b). The existing conditions and impact analysis that apply to this SEIR were therefore referenced rather than repeated. The commentor is referred to Section 1.4, *Documents Incorporated by Reference*, on page 1-4 of the Draft SEIR.

This comment does not raise a specific environmental issue. However, it should be noted that it is within the purview of the County of Los Angeles to make a request to change the operational characteristics of the Virginia Robinson Gardens, which is the issue at hand. To do so, the County is requesting a discretionary action—an amendment to the existing operating Agreement between the County and Friends of Virginia Robinson Gardens. By way of discretionary action, the Los Angeles County Board of Supervisors will authorize the Director of the Department of Parks and Recreation to enter into an amended Support Agreement with the Friends of Robinson Gardens to reflect the operational changes approved by the Board. Formally, this amendment would consist of revising Section 4.05 of the Agreement to reflect the proposed changes to the operation of Virginia Robinson Gardens approved by the Board of Supervisors. All comments will be provided to decision-makers prior to consideration of the Proposed Project.

Letter 138 - Sam Hakim - September 6, 2022

Dear Ms. Chien-

I am writing to OPPOSE the County's proposed changes for the Virginia Robinson Gardens.

Many of the neighbors have met in person or by Zoom with County representatives and/or written letters to the County. The Draft SEIR didn't answer any of our concerns. We are concerned with the traffic, parking, noise and fire risk- none of these issues are adequately addressed in the Draft SEIR. I know you will hear from many neighbors.

Under the current operations, there are 4 daytime events a year, which are difficult for the neighborhood to absorb. 24 events will completely overwhelm the neighborhood.

One issue which is particularly troublesome to me is how the County and the Friends organization uses Elden Way for these Events.

Delivery Trucks

Several days prior and after events held at the Gardens, Elden Way becomes as staging area as there is NO truck access inside the Gardens. Understand, that the Gardens space for events would be 100% outdoors. Everything must be trucked into the Garden- rental tables, chairs, dishes, plates, silverware, and food preparation items (ovens, etc.). There are no catering facilities existing in the Garden. In addition, lighting and sound systems need to be brought in and set up as well as any dance floor. Even restrooms will need to be brought in. After any event, all these items are packed up again and taken away.

Unloading and reloading these items are all done on the public street of Elden Way because delivery trucks can't access the Garden.

What other Garden uses the public street to do this? Descanso Gardens has its own parking lot (800 spaces) and its own Café, which is required to be used for any event.

Blocking the Street

At all past events, **ALL** of Elden Way is completely blocked off to any residents parking. That is the only way to have two way traffic so cars can

138-1

come up the street, circle in front of the Gardens to let people off and continue down the street to exit. Valet Parking along Crescent Drive exceeds the 2-hour limit posted.

The County suggests using UBER and LYFT. That will double the number of trips to the Gardens and cars will idle and emit fumes while they are in line waiting to drop off and pick up attendees.

Emergency Vehicles

My parents live on Elden Way and are elderly and have health issues. Emergency vehicles will be totally blocked from reaching my parents' home in case of an emergency. Emergency vehicles also can't access the Gardens if there is an emergency within. **This creates a health and safety issue for our community.**

138-1
cont.

Alternatives which should be considered in the Final SEIR

An alternative the Final SEIR should examine is to limit the number of events to 4, as it has been done in the past. Turning the Gardens into a commercial venue for Weddings and other family celebrations for 24 events, up to 4 a month will create an impossible traffic jam in our neighborhood and create health and safety issues.

Another alternative the Final SEIR should examine is for the Gardens to take part of their 6 acre property and create more parking inside the Gardens.

Respectfully submitted,

Sam Hakim



Responses to Letter 138 – Sam Hakim

Response to Comment 138-1:

Thank you for your comment. The commenter states their opposition to the Proposed Project due to traffic, parking fire and noise concerns. The commenter is particularly concerned about traffic impacts to Elden Way. Please refer to Master Response 1, Master Response 2, and Master Response 3. This comment is noted.

The commenter also requests Project alternatives to be considered, including a limited number of Special Use Events and creating more parking inside the Gardens property. This comment is noted.

Letter 139 - City of Beverly Hills - September 6, 2022



September 6, 2022

Ms. Jui Ing Chien, Park Planner
Mr. Clement Lau, Departmental Facilities Planner
County of Los Angeles Department of Parks and Recreation
1000 S. Fremont Avenue
Unit #40 A-9 West, 3rd Floor
Alhambra, CA 91083
Via USPS and Email

RE: Draft Supplemental Environmental Impact Report (DSEIR) – Virginia Robinson Gardens (1008 Elden Way, Beverly Hills, CA 90210)

Dear Ms. Chien & Mr. Lau:

Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Report (DSEIR) for the proposed operational changes to the Virginia Robinson Gardens (the Gardens), located at 1008 Elden Way in the City of Beverly Hills (Project).

It is our understanding that the Project includes the following changes to the operations of the Gardens property:

- Hours open to the public: Monday to Sunday (7 days a week), from 9:30 AM to sunset;
- Number of patrons: with advance reservations, up to 200 visitors per day, spread throughout the day for either tours, meetings, seminars/classes, events, or commercial filming (video only, no motion picture), or a combination of any of these activities;
- Types of events: in addition to existing events, consider family ceremonies such as weddings;
- Special uses: up to 24 special use events a year/approximately 2 per month.

139-1

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The City of Beverly Hills has received extensive written and oral public comment expressing serious concerns regarding the impacts that will likely result from the intensification of activities and uses at the Gardens and shares those concerns. The City has also received several letters expressing support for the expansion of access to the Gardens by the public, as well as support for the programs provided at the Gardens for children and adults alike. Copies of the written public comments on the DSEIR received by the City from community members are attached to this letter for your reference. Please note that many letters submitted may also represent multiple members of the same households. While the City similarly supports the overall mission of the Gardens' operations, it is opposed to the significant operational changes that are under consideration, given the potential for adverse impacts to occur to the residential areas adjacent to the site. The City would support changes that expand public access to the site, if impacts can be meaningfully mitigated so that fewer adverse impacts related to noise, traffic, and parking issues would result. As such, the City would support the implementation of additional voluntary mitigation measures and operational conditions/restrictions that could help ameliorate the potential for such impacts, and has provided some suggested conditions below.

139-1
cont.

The DSEIR has studied several impacts related to the operational changes at the Gardens, including air quality/greenhouse gas emissions, noise, energy, historical resources, and transportation/traffic. It is notable that the DSEIR has determined that noise will have a less than significant impact with mitigations, and traffic will have a significant and unavoidable impact. After review of the environmental analysis in the DSEIR, the City has found that it fails to provide a sufficient degree of information and analysis to allow a reasoned decision on the impact of the proposed operational changes. The City continues to have serious concerns regarding the impacts of the proposed project and strongly opposes any changes proposed at the project site that would result in adverse impacts to the adjacent residential areas. The following comments are provided on the DSEIR topics and various impacts that are expected to result from the proposal, as well as requests related to potential voluntary actions that may mitigate these impacts:

AIR QUALITY & GREENHOUSE GAS EMISSIONS

Thank you for analyzing the following topics in the DSEIR related to air quality and greenhouse gas emissions:

- The impact of increased vehicular trips to the site as a result of expanded operating hours and an increase in the frequency of events, including the addition of valet parking trips. The analysis must also consider impacts to residential areas through which the main access routes proceed to the Gardens.
- The impact of the use of temporary mechanical equipment for events that are combustion-based (e.g. generators, gas heaters, refrigeration and catering equipment).

139-2

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- The potential exposure of sensitive receptors and large numbers of people to pollutants.
- The impact of idling vehicles (passenger and delivery trucks) due to limited street access and widths.

However, the City continues to have concerns regarding the potential air quality impacts associated with the proposed operational changes, as these changes would significantly increase the number of trips made to and from the Gardens, as a result of increased visitors, and the number of deliveries. In addition, the proposed operational changes will result in an increase in the number of idling vehicles. All of these activities will create adverse air quality impacts in the local residential neighborhood adjacent to the Gardens.

139-2
cont.

NOISE

With regard to noise impact analysis, the City had previously requested that the technical study collect meaningful and complete baseline noise levels (background and ambient noise) for all times of day, including all days of the week on the project site and in the surrounding residential neighborhoods. However, the ambient noise measurements performed were only for 3.75 days.

The City continues to have significant concerns regarding the noise impacts that will result from the proposed project and how such noise impacts will affect the adjacent single family neighborhood. The City has concerns regarding various noise sources, including amplified music and speech, crowds, traffic, event noise, and noise from miscellaneous equipment, including generators, that may be temporarily located on site.

Although the DSEIR includes a mitigation measure that sets forth certain requirements for special events that use amplified sound, the City also requests that additional conditions are included to mitigate potential noise impacts. The City requests the following conditions be added:

139-3

- Prohibiting use of amplified sound, including music. If the use of amplified sound is not prohibited, then limits on the hours of its use should be imposed, as well as limits on where such amplified sound may be located on the site (e.g. locating amplified sound inside buildings only).
- Limiting hours for outside events to prevent any noise impacts on surrounding residential neighborhoods during evening and nighttime hours.
- Limiting the maximum number of attendees permitted at events.
- Minimizing traffic noise by requiring all parking that cannot be accommodated on site to be provided in commercial areas (and not in residential areas in the vicinity of the Gardens) with shuttle bus services between the Gardens and the parking.
- Prohibiting any noise-generating devices such as fireworks and other pyrotechnic or similar devices.

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LIGHT

Thank you for analyzing the following impacts related to light in the DSEIR:

- The impact of both daytime and nighttime events, and increases in vehicular traffic to the site, adding to light pollution (including passenger vehicles and deliveries).
- The use of lighting during existing and for the proposed extended operating hours.

The DSEIR discusses potential lighting impacts, and concludes that lighting would result in a less than significant impact. However, the City still has concerns about the potential impacts of light pollution on the wildlife present in the Gardens as well as on adjacent residential properties. The City requests that the following mitigations are also added:

- Limit the use of lighting near the entrance of the property, where there are fewer buildings and landscaping that may buffer such lighting.
- Limit the hours during which additional lighting may be set up for events.
- Prohibiting the use of any fireworks, pyrotechnic devices, and any similar light generating devices on the site.

139-4

TRANSPORTATION/TRAFFIC & PARKING

The DSEIR has stated that there is a significant and unavoidable traffic impact that will result from the proposed operational changes at the Gardens, and as such the County will need to adopt a Statement of Overriding Considerations. The City believes that such identified impact should indicate that there is a legitimate need for the County to review and revise the scope of the proposed project, and consider additional project alternatives that could reduce impacts to less than significant levels (with or without mitigation). In addition, it is incumbent upon the County to implement further mitigations to help relieve the impacts that will be created from this project. As the County must know, a Statement of Overriding Considerations cannot be adopted unless all feasible mitigation measures that can reduce or eliminate the significant impacts. The City and members of the public have identified a number of feasible project modifications and operational limits and controls that must be adopted as mitigation before the County could adopt a Statement of Overriding Considerations.

139-5

The traffic analysis for the following intersection located in the City of Beverly Hills near the project site was requested, but was not included. The Final SEIR should include an analysis of this intersection:

- Lexington Road and Cove Way;

The DSEIR also looked at the increase in vehicular trips to and from the site that result from an expansion of operating hours and the number of events, and included the following information:

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- An estimate of cumulative traffic generated from all projects (approved/pending) within a one mile radius of the project site.
- The City of Beverly Hills thresholds of significance and local transportation assessment guidelines.

However, the City has serious outstanding concerns regarding traffic and parking impacts, and hereby requests that a more detailed analysis be undertaken regarding the increased physical impacts on the environment, and neighborhood, resulting from the combination of spillover effects resulting from the limited parking provide on-site and the substantial increase in the number of events that are contemplated by the modifications. The DSEIR analysis suggests that there would not be an increase in the number of vehicles that could park on neighborhood streets during any given event, but the analysis ignores the substantial increase in the number of times a year that the spill over impacts on the streets will occur. As such, the DSEIR has failed to disclose the magnitude of the physical impacts on the environment, in contravention to CEQA strong policy of fully informing the public and decision makers of a project's environmental impacts.

Further, after completing the necessary analysis of physical impacts resulting from spillover parking, the City requests that the County adopt additional conditions and mitigation measures to address the significant traffic impacts including, but not limited to:

- Minimizing traffic and parking impacts by prohibiting employees, contractors, vendors, and all patrons and guests at the Gardens from parking in nearby residential areas, and requiring all parking that cannot be accommodated on site to be provided in commercial areas (and not in residential areas in the vicinity of the Gardens) with shuttle bus services between the Gardens and the parking. The shuttle buses should be zero emission to minimize any greenhouse gas emissions.
- Providing additional funds to support an increased demand for parking enforcement services.
- Provide a drawing of the existing/proposed street operations (pickup/dropoff staging) on Elden Way and Crescent Drive. Provide a valet plan that can be reviewed and approved by the City for all special events proposed in the future, which can be enforced by the City's Traffic Control Officers.
- Provide a staging plan for transport of equipment, etc for special events. The DSEIR mentions a staging area on Crescent Drive to transfer rental items to a smaller vehicle; then this smaller vehicle will enter Elden Way from Crescent Drive to drop off these rental items.

139-5
cont.

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FIRE HAZARD

Please note that the Virginia Robinson Gardens and the surrounding areas are located in a Very High Fire Hazard Severity Zone (VHFHSZ). The analysis does not fully analyze the potential impacts associated with the intensification of use, including the increased potential that operations at the Gardens could cause fires, as well as on emergency response plans due to the intensification and higher concentration of people that could be on the site and need to be evacuated in the event of fire. The proposed project would increase the chances of a wildfire starting due to the intensification of uses and increase in events, increase the number of people that would be exposed to the wildfire risks and could require evacuation services because of the increase in the number of events.

Further, the analysis does not adequately study evacuation through modeling, which is necessary due to the increased exposure of Gardens visitors in light of the drastic increase in the number of large events and the possibility of even more events, such as weddings. There are no considerations of providing a facility onsite to enable those on the site to safely shelter in place in the event of a wildfire. In addition, the DSEIR must consider and analyze evacuation options, and develop a comprehensive, site specific evacuation plan now as part of the project, or require the development of such a plan as a mitigation measure before the contemplated project modifications could be implemented. The City is also concerned that with the ongoing drought, fire conditions will be exacerbated in the future with the implementation of stricter watering regulations. The DSEIR does not address this reality, nor does it address the unique challenges present on the site, including the narrow driveways, sloping and uneven landscape, and the lack of a secondary fire hydrant for additional water resources during a fire event.

The DSEIR did not analyze and adopt mitigation measures to address potential wildfire impacts. The City requests that the following measures be adopted as part of the operational conditions for the site:

- Prohibitions on any outdoor use of open flames.
- Prohibitions on any type of fireworks, pyrotechnics, and any other similar type of device that could cause a fire.
- The creation of an evacuation plan for a wildfire event that demonstrates there is adequate capacity for City streets to accommodate the number of visitors to safely evacuate, without impeding existing evacuation routes and access routes for the Beverly Hills Fire Department. Benedict Canyon Drive is identified as a street on the evacuation plan for the City, in order to direct residents either to the north or the south, depending on the fire risk.
- Other preventative measures to mitigate fire risk, such as a plan for vegetation clearance and trimming.

139-6

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ALTERNATIVES

As part of a range of reasonable alternatives, the City previously requested that the DSEIR include a specific alternative consisting of deeding the Virginia Robinson Gardens property back to the City of Beverly Hills for management and operational oversight. The DSEIR does not include this alternative, which the City believes would be an environmentally superior alternative, and is feasible. Thus, the additional alternative should be analyzed, and the DSEIR recirculated to allow for public review and comment on that alternative (and the other additions to the DSEIR as noted herein).

139-7

PUBLIC SERVICES

Although the DSEIR discussed the public services available to the Gardens, the City has outstanding concerns regarding the impact of the proposed operations on the demand for public services. The City requests that the County considers the following in regards to public services:

139-8

- As a result of the increase in the number of visitors to the Gardens on a daily basis, there is a potential increase in demand for fire protection, and police protection services.
- In addition, with an increase in visitors, the need for parking enforcement services will also increase.

CULTURAL RESOURCES

Please note that the Virginia Robinson Gardens property is a local historic landmark (Beverly Hills Historic Landmark No. 2), and is also listed on the National Register of Historic Places. As such, please note that any modifications to the designated historic resource may require City approval of a certificate of appropriateness pursuant to the City's Historic Preservation Ordinance (Article 32 of Chapter 3 of Title 10 of the Beverly Hills Municipal Code).

139-9

Please work with the City's historic preservation staff on how to best address these important cultural resources in Beverly Hills. Please contact Mark Odell, Urban Designer, at (310) 285-1116 or modell@beverlyhills.org regarding historic and cultural resource issues related to the project. The DSEIR does not note that the City's Urban Designer has been consulted as part of the drafting of this document.

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OTHER CONCERNS

In addition to the above discussion of impacts related to the proposed operational changes, the City would like to raise concerns related to the potential issue of an ill-defined project description and scope. Given that the proposed change would provide the superintendent of the Gardens the discretion to approve various types of special events. Since this could encompass a large variety of events and operations, the project description and associated analysis may be inadequate.

Furthermore, the City is concerned that the proposed uses of the Gardens are inconsistent with the original bequest of the Gardens from Mrs. Robinson to the County because of the expanded use of the site for a commercial event venue. The City again would like to request that the County deed the Gardens property to the City, so the City may control the use and operation of the site in a manner that is not inconsistent with the original bequest and is compatible with adjacent residential uses. The City would like to note that any special events must comply with the City's regulations, including the requirement to obtain a valet permit and special event permit, and requests that this is also stated as a condition for the project. Given that there is a significant potential for adverse impacts to result from a six-fold increase in the number of events allowed per year, the City also requests that the County consider reducing the number of events proposed (such as to a maximum of 12 events per year including all special events such as weddings, with no more than 2 events per month), and limiting a certain number of events during the year to occur in the evening hours, with the remainder of events occurring during the normal operating hours of the Gardens.

139-10

PUBLIC NOTICE

The City hereby requests that the County provide the City with all notices pursuant to CEQA and Planning and Zoning Law, and any County ordinances and regulations including, but not limited to Public Resources Code Sections 21092 and 21092.5, and State CEQA Guidelines Sections 15087 and 15088(b). Further, pursuant to Public Resources Code Section 21167(f), the City hereby requests that the County provide a copy of any notice of determination related to the Project as may be filed.

139-11

Thank you again for this opportunity to provide input on the environmental review of this project. Please list Timothea Tway, City Planner, as primary contact for the City of Beverly Hills, and place her name on the list of interested parties to receive copies of all notices issued regarding the Project. She can be reached at ttway@beverlyhills.org or (310) 285-1122. If you have any questions regarding this letter, please feel free to contact me at (310) 285-1118 or by email at rgohlich@beverlyhills.org.

**Proposed Operational Changes at the
Virginia Robinson Gardens
Final Supplemental Environmental Impact Report**

Virginia Robinson Gardens
September 6, 2022
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Sincerely,



IVAN COLLICH, AICP
Director of Community Development

cc: George Chavez, City Manager
Nancy Hunt-Coffey, Assistant City Manager
Laurence Wiener, City Attorney
Julian A. Gold, M.D., Vice Mayor of the City of Beverly Hills
Lester Friedman, Councilmember of the City of Beverly Hills
Sharona Nazarian, Ph.D., Councilmember of the City of Beverly Hills
John A. Mirisch, Councilmember of the City of Beverly Hills
Chief Mark D. Stainbrook, Beverly Hills Police Department
Chief Gregory Barton, Beverly Hills Fire Department
Supervisor Sheila Kuehl, County of Los Angeles Board of Supervisors

Department of Community Development, 455 N. Rexford Drive, Beverly Hills, California 90210 P (310) 285-1141 F (310) 858-9166

BeverlyHills.org

Responses to Letter 139 – City of Beverly Hills

Response to Comment 139-1:

This comment provides introductory statements and a summary of the proposed operational changes. The comment states that the City of Beverly Hills has received written and oral public comment expressing opposition and support of the Proposed Project. Copies of the written public comments on the Draft SEIR received by the City from community members are provided in Appendix C of this Final SEIR.

The City expresses support for the overall mission of the Gardens but opposes any changes that would result in adverse impacts to the adjacent residential areas. This comment is noted.

Response to Comment 139-2:

The City expresses concerns regarding the potential air quality impacts associated with the proposed operational changes, including increased vehicle traffic from visitors and deliveries. The operational impacts are discussed Section 3.4, *Air Quality*, beginning on page 3-7 of the Draft SEIR. The impact of idling vehicles is specifically outlined page 3-8. Impacts were determined to be less than significant. This comment is noted.

Response to Comment 139-3:

The City is concerned for potential noise impacts that will result from the Proposed Project and how such noise impacts will affect the adjacent single-family residences.

The Draft SEIR analyzed noise impacts from sources including amplified music and speech, crowds, traffic, event noise, and noise from miscellaneous equipment. As discussed on page 3-53, it is noted that the City's noise regulations (Title 5, Chapter 1, *Noise Regulations*, of the City's Municipal Code) state that it is prohibited for any person within any residential zone of the City to use or operate any sound amplifying equipment between the hours of 10:00 p.m. and 8:00 a.m. to be distinctly audible at or beyond the property line of the property on which the equipment is located. Therefore, the Project's noise-related effects associated with the increase in the frequency of Special Use Events would continue to be limited to the less noise-sensitive daytime hours. Please refer to Master Response 4.

Finally, the City provided a list of suggested conditions to address noise impacts. The County will coordinate with the City on the implementation of the suggested conditions prior to implementation of the operational changes approved by the Board of Supervisors. This comment is noted.

Response to Comment 139-4:

This comment outlines concerns about the potential impacts of light pollution on the wildlife present in the Gardens as well as on adjacent residential properties. The City provides a list of suggested conditions to address light impacts. The Draft SEIR concluded that impacts associated with light pollution would be less than significant, therefore mitigation measures are not warranted. Please refer to page 3-3 of the Draft SEIR. This comment is noted.

Response to Comment 139-5:

The City requests that the County review and revise the scope of the Proposed Project, and consider additional Project alternatives that could reduce traffic impacts to less than significant levels. The Proposed Project was found to result in significant and unavoidable traffic impacts and no feasible mitigation measures were identified. The impact resulted from the daily increase in visitors and the exceedance of the local street threshold on Elden Way. The Reduced Daily Visitor Alternative, in addition to the No Project Alternative, were considered in the Draft SEIR analysis to address the traffic impact on Elden Way. This comment is noted.

The City requests that the intersection of Lexington Road and Cove Way be included in the Final SEIR traffic analysis. This intersection was not analyzed in the Draft SEIR because these two roads do not intersect. However, the nearest intersection at Lexington Road and Hartford Way, was included in the traffic impact analysis.

The City is concerned with spillover effects resulting from the limited parking provide on-site and the increase in the number of Special Use Events. Please refer to Master Responses 1, 2, and 3.

Finally, the City requests that the County adopt additional conditions to address the significant traffic impacts. The County will coordinate with the City on the implementation of the suggested conditions prior to implementation of the operational changes approved by the Board of Supervisors. This comment is noted.

Response to Comment 139-6:

The City states that the Draft SEIR does not fully analyze the potential fire hazard and emergency response impacts associated with the intensification of use. Please refer to Master Response 6 and Master Response 7.

The City requests that the County adopt additional conditions to address fire hazard and emergency access. The Draft SEIR concluded that impacts associated with fire hazard and emergency response would be less than significant, therefore mitigation measures are not warranted. Please refer to pages 3-23 and 3-79 of the Draft SEIR. This comment is noted.

Response to Comment 139-7:

This comment requests that the Draft SEIR analyze an alternative consisting of deeding the Virginia Robinson Gardens property to the City of Beverly Hills for management and operational oversight. Please refer to Master Response 11. This suggested alternative is speculative and outside of the purview of the County. Without any details on how the City may manage and operate the Gardens differently, there is insufficient information to analyze this scenario and its potential impacts. This comment is noted.

Response to Comment 139-8:

The City requests that the County consider additional topics regarding public services. Please refer to Master Responses 2, 3, 6, and 7. This comment is noted.

Response to Comment 139-9:

The City reiterates that the Virginia Robinson Gardens is a local historic landmark and is also listed on the National Register of Historic Places. The site's historical significance is discussed in Section 3.6 *Cultural Resources* on page 3-12 of the Draft SEIR and in Appendix C. The City also states that any modifications to the designated historic resource may require City approval of a certificate of appropriateness pursuant to the City's Historic Preservation Ordinance. As described in Section 3.2 *Aesthetics* of the Draft SEIR, the Proposed Project would not involve any physical changes, such as the construction of new buildings, alteration of existing buildings, change to landscaping, or alteration of the visual aspects of the Project Site in any way.

The City requests that the County consult with the City of Beverly Hills Urban Designer regarding historic and cultural resource issues related to the Project. This comment is noted.

Response to Comment 139-10:

The City raises concerns of potential issue of an ill-defined project description and scope. Furthermore, the City is concerned that the proposed uses of the Gardens are inconsistent with the original bequest of the Gardens from Mrs. Robinson. The City requests that the County deed the Gardens property to the City, consider reducing the number of events proposed, and limit a certain number of events during the year to occur in the evening hours. Please refer to Master Response 8. This comment is noted.

Response to Comment 139-11:

The City requests that the County provide the City with all notices pursuant to CEQA and Planning and Zoning Law, including any Notice of Determination that may be filed. The City lists Timothea Tway, City Planner, as primary contact for the City of Beverly Hills. The County has provided all notices to the City pursuant to CEQA and will provide the Notice of Determination when it is filed. This comment is noted.

Letter 140 - Kristin Chandna - September 6, 2022

Sent by email jchien@parks.lacounty.gov

Ms. Jui Ing Chien

Park Planner, Department of Parks and Recreation

Dear Ms. Chien-

The neighborhood surrounding the Virginia Robinson Gardens is very quiet and peaceful, especially in the evening and on weekends. I know this neighborhood well, because my parents live in this area, I grew up in this house and I still spend a lot of time there with my children.

This is a residential neighborhood. The neighbors are considerate and rarely have parties.

When parties are held, the amplified music carries throughout the neighborhood and can be heard distinctly on many properties.

My parents and other neighbors are concerned about the County's proposal to rent out the Gardens for Wedding and other private parties. The fact that there will be 24 a year (up to 4 a month) will have a huge negative impact on the neighborhood. Party noise will become a regular occurrence.

The noise analysis done in the Draft SEIR is incomplete and does not accurately capture the impact of the noise on the neighborhood.

I ask that you follow the suggestions made by Antony Spencer (1075 Carolyn Way) who has had extensive experience with noise studies. He has outlined what should be done to accurately assess the impact of noise on the neighbors from the proposed changes.

Thank you very much,

Kristin Chandna

Danalda Drive

Los Angeles, California

140-1

Responses to Letter 140 – Kristin Chandna

Response to Comment 140-1:

Thank you for your comment. This commenter provides anecdotal information and expresses concern for noise generated by Special Use Events. The commenter states that it is their opinion that the County has failed in preparing the appropriate noise impact analysis. As described in Section 3.14 *Noise* and Appendix E of the Draft SEIR, the noise impact assessment was conducted by qualified noise specialists. Please see Master Response 4 and Master Response 5.

Letter 141 - Pedro Andrade - September 6, 2022

Dear Ms. Chien,

The Friends of the Robinson Gardens have submitted letters on behalf of the VRG and support of the proposed changes. I am opposed to the changes and feel that the comparison that the VRG draws to other Arboretums and Botanical Gardens is not valid.

1. Request to stay open until Sunset: Descanso Gardens is open until 7, South Coast Botanical Garden until 5, LA County Arboretum until 4:30 or 6:30 with shorter hours on the weekend. 141-1
2. Size and Facilities: The Descanso Gardens sits on 160 acres with 800 parking spaces and is bordered by a major highway and has a full café and catering on site with a metro train running through it. The VRG sits on 6 acres in a residential section, bordered only by private homes, has no food service available (everything must be brought in), has less than 35 parking spaces, and has no access to public transportation (bus is a 3-4 block walk, and nearest Metro will be Wilshire and Rodeo when completed). 141-2
3. The VRG compared themselves to The Wallis and to LACMA which are in a commercial/business zone and have major dedicated parking lots so that no one needs to park on neighboring streets. This is not the case with the VRG as they have gardeners and maintenance staff as well as office and event staff who would be presumable utilizing some of their "claimed" 35 spaces. 141-3
4. The VRG claims to need more hours so they can access more students. If the goal is education, then why are school tours only scheduled from 10-12:30 and limited to 42 students? Assuming a tour would be 90 minutes to 2 hours, why can't they do a second or third tour during the day? Schools try to leave a property in time to return students to school. Opening the park on Sundays would not increase the number of children's educational events. 141-4
5. The VRG is not a park. Parks are for recreation with hiking trails, walking paths, play equipment for children and dogs are allowed. The VRG is a series of winding paths through the property on uneven terrain and can only be accessed as part of organized tour (by reservation). 141-5
6. Special 24 events (up to 4 per month). This places an unreasonable burden on immediate neighbors and those on nearby streets as trucks must be brought in for catering, rentals, flowers, music, etc. The VRG is in the middle of a residential neighborhood with inadequate parking for larger events that require outside staff, valet, etc. Events with as many as one thousand guests would create a huge burden on traffic. Given the large fees for rentals, valet, permits, catering, etc., these special events would appeal only to corporate or wealthy individuals and thus doing nothing to increase inclusivity. 141-6

I look forward to seeing these issues addressed in the Final SEIR.

Sincerely,



Pedro Andrade

Responses to Letter 141 – Pedro Andrade

Response to Comment 141-1:

Please refer to Response to Comment 99-1. This comment is noted.

Response to Comment 141-2:

Please refer to Response to Comment 99-2. This comment is noted.

Response to Comment 141-3:

Please refer to Response to Comment 99-3. This comment is noted.

Response to Comment 141-4:

Please refer to Response to Comment 99-4. This comment is noted.

Response to Comment 141-5:

Please refer to Response to Comment 99-5. This comment is noted.

Response to Comment 141-6:

Please refer to Response to Comment 99-6. This comment is noted.

Letter 142 - Roya Akhavan, Jasmin Akaks, Afsaneh Akhavan, Daniel Rafalian, Kevin Rafalian and Celine Rafalian - September 6, 2022

Ms. Jui Ing Chien
Park Planner County of Los Angeles
Department of Parks and Recreation

Dear Ms. Chien,

As a neighbor to the Virginia Robinson Garden and a resident of Beverly Hills, we are writing to oppose the proposed Operating Changes to the VRG. We ask that you (Department of Parks Recreation as well as the Board of Supervisors seriously consider our concerns.

1. Per the Virginia Robinson Bequest, the Gardens can legally be used as a public botanical garden and museum, but not as a park, a performance center, a catering/event center, commercial venue etc. Yoga classes, making gingerbread houses, screening movies, using it as a picnic venue, also appear to be outside the scope of the Bequest. 142-1
2. The Project seems to be changing focus which precludes the neighbors from making accurate comments. Last November, the VRG were advocating 24 special events with family ceremonies and weddings 2 per month. The scope on 7/22/22 added children's programming, 4 special events per month, subsidizing musical and performing arts events and a movie screening, as well as cooking classes, painting, wine, etc. And all activities are to be approved by the discretion of the Superintendent. 142-2
3. The VRG is a botanical garden / arboretum. It is not a park with play equipment, dog walking or hiking trails and sits on just 6 acres in a residential area. It cannot be compared to larger gardens that sit on 150 acres with parking for 800 people not with cultural centers such as LACMA or the Wallis which sit in the middle of a business zone and have their own very large parking structures. 142-3
4. Traffic is a major issue and must be looked at given the possibility of an event for 1000 people which could be held on a weekday or weekend. Parking is another major issue in that the VRG claims to have 35 spaces (up from the 20 they had last November). Where are they. Both traffic and parking must be considered when you have a very steep driveway that does not accommodate large trucks for rental supplies, catering, etc. which necessitates loading and unloading on Elden Way inconveniencing neighbors for days. Likewise, neighboring streets such as Lexington, Hartford, Benedict, and Cove Way are impacted by the already congested traffic at certain times of the day. Your project states the traffic on Elden Way would be significant and unavoidable. The impact is just as great on surrounding streets. Using Uber or Lyft just doubles the amount of traffic on the street and there is no easy access to public transportation. 142-4

Sincerely,

Roya AKhavan 1025 Carolyn way BH 90210

Jasmin AKaks 520 Foothill Rd. BH 90210

Afsaneh Akhavan 2658 Canon Dr 90212

Daniel, Kevin Celine Rafalian 1025 Carolyn way

**Responses to Letter 142 – Roya Akhavan, Jasmin Akaks,
Afsaneh Akhavan, Daniel Rafalian, Kevin Rafalian and Celine Rafalian**

Response to Comment 142-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues. This comment provides introductory information from the commenter, including that they are a neighbor to the Project Site and have concerns regarding the Proposed Project. The commenter also claims that certain events at the Gardens are inconsistent with the original bequest of the Gardens from Mrs. Robinson. Please refer to Master Response 8 and Master Response 10. This comment is noted.

Response to Comment 142-2:

Please refer to Response to Comment 82-1. This comment is noted.

Response to Comment 142-3:

The commenter claims that the Draft SEIR compares the Virginia Robinson Gardens to other larger public parks and gardens. This comment is noted.

Response to Comment 142-4:

Parking is discussed in Section 2.2.3, *Special Use Events*, on page 2-4 of the Draft SEIR and Section 2.4.5, *Parking*, beginning on page 3-29 of the Draft SEIR. Parking and traffic impacts associated with the Proposed Project are discussed in Section 4.18, *Transportation*, beginning on page 3-61 of the Draft SEIR. The County has also prepared a site-specific traffic impact assessment for the Proposed Project which is included as Appendix F of the Draft SEIR. Please refer to Master Response 1, Master Response 2, and Master Response 3.

Letter 143 - Roya Akhavan, Jasmin Akaks, Afsaneh Akhavan, Daniel Rafalian, Kevin Rafalian and Celine Rafalian - September 6, 2022

By email jchien@Parks.lacounty.gov

Dear Ms. Chien,

We are writing to express our OPPOSITION to the proposed Operating Changes to the Virginia Robinson Gardens.

The Draft SEIR is inaccurate in its analysis of traffic in our neighborhood. The Traffic Study was conducted on one day in February when many people were still working from home and not commuting. It's not an accurate representation of what the traffic is like now. Now more people are back to work and the traffic is worse than it was before the Pandemic.

Our neighborhood is hemmed in by two streets which are major thoroughfares to the Valley- Benedict Canon on the West and Beverly Drive which pours into Coldwater Canyon on the east. Lexington Avenue is the cross street connecting these two major thoroughfares.

Already cars line up along Hartford Way especially in the afternoon idling and waiting in line to turn right onto Coldwater Canyon. Cars often block our driveway and the streets- Cove Way and Pamela Drive- which pour into Hartford Way. Sometimes these cars back all the way up on to Lexington in a line.

Traffic is completely stalled on Beverly Drive as it funnels into Coldwater Canyon. Already cars are backed up, idle and jam our streets.

We are requesting that the Traffic Study be redone to reflect the situation now.

Second, the Traffic Study does not address how the Gardens will handle the 24 Special Events. The 4 current events crowd our streets with parked cars and make it impossible to get in and out of our driveways, which is especially worrisome if there is an emergency.

The traffic study completely ignored the effect of the 24 proposed Special Events. All cars from those Events will arrive and leave basically together. If Uber and Lyft are used, it will mean twice as many trips- dropping off and picking up.

The County should have to limit the Special Events to 4 and create a Traffic Management Plan for all the Events.

How can the Gardens get Valet Permits for 24 events. None of the other houses in the neighborhood would be allowed to get that many permits. The Gardens will know about their events well in advance and probably apply early for these Permits, basically preventing other neighbors from being able to get Valet Permits for their personal entertaining.

The SEIR should state how the Gardens will deal with Valet Parking permits.

Thank you,

Roya AKhavan 1025 Carolyn way BH 90210
Jasmin AKAKS 520 Foothill Rd BH 90210
Afsaneh Akhavan 265 S. Canon Dr. 90210

Daniel - Kevin - Celine Rafalian 1025 Carolyn way BH 90210

**Responses to Letter 143 – Roya Akhavan, Jasmin Akaks,
Afsaneh Akhavan, Daniel Rafalian, Kevin Rafalian and Celine Rafalian**

Response to Comment 143-1:

Please refer to Response to Comment 102-1. This comment is noted.

Response to Comment 143-2:

Please refer to Response to Comment 102-2. This comment is noted.

Response to Comment 143-3:

Please refer to Response to Comment 102-3. This comment is noted.

Letter 144 - Roya Akhavan, Jasmin Akaks, Afsaneh Akhavan, Daniel Rafalian, Kevin Rafalian and Celine Rafalian - September 6, 2022

Dear Ms. Chien,

I am writing to request the SEIR for the Robinson Gardens be redone. I am opposed to the proposed Operating Changes as the Draft Seir is incomplete and/ or inaccurate especially regarding traffic and the lack of a traffic management plan for all 24 special events.

1. Traffic can be completely stalled on Beverly Drive as it extends into Coldwater Canyon on the East and on Benedict Canyon on the West. Cars line up on Lexington as well as Hartford to turn right onto Benedict blocking driveways and entrances to Cove Way and Pamela. 144-1
2. The traffic study does not reflect the impact of 24 special events with as many as 1000 guests and staff. Nor does it address the set-up and tear-down after an event where trucks would be brought for rentals, catering, and florists, as well as how parking or traffic will be handled for valet and event staff. A storage container has been placed on the small Cove Way parking lot which is to be used by staff/gardeners/etc. decreasing the number of parking spaces and necessitating that these workers often park on Cove Way. 144-2
3. Twenty-four special events will impact the neighborhood in that it will be impossible for residents to get Valet Parking permits for the same weekends. The VRG should be required to obtain valet parking permits. 144-3
4. While the SEIR claims there are 35 parking spaces, I doubt there are that many usable in practice. 144-4

Thank you for your time and consideration.

Roya Akhavan 1025 Carolyn way

Jasmin AKAKS 520 Foothill Rd. BH 90210

Afsaneh Akhavan 263 S. Canon Dr 90212

Daniel - Celine - Kevin 1025 Carolyn way BH 90210

**Responses to Letter 144 – Roya Akhavan, Jasmin Akaks,
Afsaneh Akhavan, Daniel Rafalian, Kevin Rafalian and Celine Rafalian**

Response to Comment 144-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues. This comment provides anecdotal information regarding traffic congestion in the surrounding neighborhood. The commenter also expresses opposition to the Proposed Project. This comment is noted.

Response to Comment 144-2:

This comment states that the traffic impact analysis does not reflect the impacts of Special Use Events. The commenter also states that a storage container has been placed on the Cove Way parking lot. As described on page 3-70 of the Draft SEIR, Special Use Events would comply with City ordinances, and valet service must obtain City parking permits for use of public streets to avoid overlapping events with surrounding neighbors. The current requirement of an event-specific traffic and parking plan would remain. Please refer to Master Response 2 and Master Response 4. This comment is noted.

Response to Comment 144-3:

The commenter states that the Gardens should be required to obtain parking permits from the City of Beverly Hills for valet parking. As outlined in Master Response 1 and in Section 2.0 *Project Description* of the Draft SEIR, Special Use Events would comply with City ordinances, and valet service must obtain City parking permits for use of public streets to avoid overlapping events with surrounding neighbors.

Response to Comment 144-4:

Please refer to Response to Comment 2. This comment is noted.

Letter 145 - Roya Akhavan, Jasmin Akaks, Afsaneh Akhavan, Daniel Rafalian, Kevin Rafalian and Celine Rafalian - September 6, 2022

Ms. Jui Ing Chien

Park Planner, LA County

By email jchien@parks.lacounty.gov

Dear Ms. Chien,

We are writing to express our OPPOSITION to the proposed Operating Changes to the Virginia Robinson Gardens.

The Draft SEIR is inaccurate in its analysis of traffic in our neighborhood. The Traffic Study was conducted on one day in February when many people were still working from home and not commuting. It's not an accurate representation of what the traffic is like now. Now more people are back to work and the traffic is worse than it was before the Pandemic.

In addition to the regular commuters, **construction is at an all time high in our neighborhood.** Several new houses have been added to the ones identified in the Draft SEIR and several already under construction were never identified.

Here are just a few of the construction projects in the neighborhood.

1033 Woodland Drive

1002 Woodland Drive

1006 Pamela Drive

Cove Way- 2 under construction

Corner of Lexington and Whittier

Corner of Lexington and Roxbury

1510 Lexington Drive- the largest by far, which will be a 15,000 square foot house with a pool house and a basement, so lots of hauling dirt.

The Final SEIR should include a complete list of all houses under construction and assess the negative impact on the traffic in our neighborhood that this construction causes. It is completely ignored in the Draft SEIR and is an important factor to consider.

Thank you,

Roya Akhavan 1025 carolyn way 90210
Jasmin AKAKS 520 Foothill Rd BH 90210
Afsaneh Akhavan 265 S. Canon DR.
Celine-Kevin - Daniel Rafalian 1025 way BH. 90210

145-1

**Responses to Letter 145 – Roya Akhavan, Jasmin Akaks,
Afsaneh Akhavan, Daniel Rafalian, Kevin Rafalian and Celine Rafalian**

Response to Comment 145-1:

This comment provides anecdotal information regarding traffic congestion in the surrounding neighborhood. The comment also states that the Draft SEIR traffic analysis is inaccurate because conditions have changed since the traffic count was conducted. The traffic impact assessment is intended to provide data in support of the Draft SEIR. Therefore, the traffic counts were conducted on February 3, 2022, prior to completion of the Draft SEIR in July 2022. Existing intersection vehicle turning movement volumes were collected during the peak periods of 7:00 a.m. to 9:00 a.m. and 4:00 p.m. to 6:00 p.m. Normal traffic activity was present at the time of the count, and schools were in session. Please refer to Master Response 1.

The commenter shares information regarding home construction projects in the neighborhood. As stated on page 5-1 of the Draft SEIR, a list of cumulative projects within one mile of the Project Site was obtained from the City of Beverly Hills. The list was obtained in April 2022, prior to completion of the Draft SEIR in July 2022. The cumulative impact analysis took into consideration the listed projects combined with land use conditions. The Project Site is located in a fully developed area of the City of Beverly Hills in a stable, single-family residential area. While demolition and replacement of estates (or construction on an existing estate) in this area of Beverly Hills may be common, these practices do not substantially change the established residential nature of the area. Development in the area is considered to be stable and would be limited to infill or replacement projects that would not significantly alter land uses in the area.

The Draft SEIR indicates that implementation of the proposed operational changes would result in new significant traffic impact. Feasible physical improvements for the local roadway volume impact on Elden Way were not identified, nor were feasible Project mitigation measures identified that would reduce the number of Project trips to a level where the local impact is not significant. The Proposed Project's impact to Elden Way would be significant and unavoidable.

All comments will be provided to the decision-makers prior to their consideration of Project approval.

Letter 146 - Roya Akhavan, Jasmin Akaks, Afsaneh Akhavan, Daniel Rafalian, Kevin Rafalian and Celine Rafalian - September 6, 2022

Jui Ing Chien
Park Planner County of Los Angeles
Department of Parks and Recreation

Dear Ms. Chien,

The Draft SEIR and various Members of the Friends have compared the Virginia Robinson Gardens with Descanso Gardens. This is inaccurate and misleading.

<u>Descanso Gardens</u>	versus	<u>Robinson Gardens</u>
-160 acres		-6 acres
-800 parking spaces		-35 parking spaces
-bordered by a major highway		-bordered only by residential properties
-Full café to supply catering		-no food services available- all will be brought in
-train running through		-no transportation

146-1

The Friends also compared Robinson Gardens with LACMA and The Wallis. Both institutions are in commercial areas and have major dedicated parking lots. Those facilities are totally different than the Gardens.

In the Final SEIR, we ask that an analysis be done of the Gardens in Los Angeles County which are in a residential area and compare parking lots, hours, and whether they allow private events.

Thank you,

Roya Akhavan 1025 Carolyn way
Jasmin AKAKS 520 Foothill Rd. 5M 9216
Afsaneh Akhavan 265 S Canon Dr. 90212
Daniel- Kevin- celine Rafalian 1025 Carolyn way

**Responses to Letter 146 – Roya Akhavan, Jasmin Akaks,
Afsaneh Akhavan, Daniel Rafalian, Kevin Rafalian and Celine Rafalian**

Response to Comment 146-1:

Thank you for your comment. The commenter claims that the Draft SEIR compares the Virginia Robinson Gardens to a much larger public garden, Descanso Gardens. This comment is noted.

Letter 147 - Charles Alpert - September 6, 2022

From: [Chuck Alpert](#)
To: [Jui Ing Chien](#)
Subject: Public Comment -- DSEIR Robinson Gardens Proposed Operational Changes
Date: Tuesday, September 6, 2022 6:58:16 PM

CAUTION: External Email. Proceed Responsibly.

Sent by EMAIL (jchien@parks.lacounty.gov)

ALL ISSUES RAISED IN THIS CORRESPONDENCE ARE INTENDED TO BE PART OF THE CEQA RECORD AND PRESERVED AS POTENTIAL CONTESTED MATTERS IN THE EVENT OF LITIGATION.

September 6, 2022

Ms. Jui Ing Chien
Park Planner
County of Los Angeles
Department of Parks and Recreation
1000 S. Fremont Ave.
Unit #40 A-9 West, 3rd Floor
Alhambra, CA 91083

re: DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT (DSEIR)
Proposed Operational Changes at the Virginia Robinson Gardens
State Clearinghouse Number: 2012091034

Ms. Chien:

The prejudice associated with the failure of the County to provide a full 45 days to comment on the above-referenced project manifests with a notice I received from the Superintendent of the Gardens in my mailbox late this afternoon.

The notice announced a "special event" this Saturday night with amplified music on the tennis court which is very near to my home. I am certain that all the guests understand that the tennis courts is the same place the Gardens parks cars at other times of the weeks.

Had the County provided a full, uninterrupted 45 day comment period, then residents would have had the opportunity to comment on the actual, not computer modeling of impacts of "special events."

Also the assertion that the special event will benefit restoration and educational programing is nothing more than a weak shill at the real purposes -- another social event for the Friends where a great percentage of the funds goes to party administration.

The lack of a full and honest impact review process is most disheartening and likely contrary

147-1

to CEQA and court decisions. The County Department of Parks and Recreation could not disregard public participation than this shallow gesture.

147-1
cont.

Respectfully submitted,

Charles Alpert
calpert@hotmail.com

Responses to Letter 147 – Charles Alpert

Response to Comment 147-1:

Please refer to Response to Comment 76-3 and 77-4.

This comment discusses a notice that the commenter received in the mail regarding an event at the Project Site. This comment does not raise any issues regarding the content or adequacy of the environmental analysis in the Draft SEIR for the Proposed Project and does not raise a specific environmental issue. This comment is noted. No further response is required.

Letter 148 - Tobi Lippman - September 6, 2022

Dear Ms. Chien-

We are writing to bring out some points that were either inaccurate or not discussed in the Draft SEIR.

PARKING, TRAFFIC AND EMERGENCY ACCESS ON OUR STREETS:

Since there are only 35 parking spaces, valet is required for any large event. Nothing in the Draft SEIR discusses what the plan is for parking all the cars which don't fit in the Gardens.

When events have occurred at the Gardens in the past, valet parkers clog our residential streets with parked cars. This makes it impossible for Emergency vehicles to get through to our homes. There are many elderly people who live in the neighborhood. If an Emergency occurs, the residents need to be sure that Emergency vehicles would be able to reach our homes.

Uber and Lyft is not a solution, because that means that the traffic will be increased two fold- one trip for drop off and one trip for pick up. It would also mean that cars will be idling in the cul-de-sac for pickup and delivery.

This is already a problem with the 4 events a year which the Garden currently sponsor. With 24 events it will be unbearable.

We request that you discuss a specific plan for handling all these cars. Specifically, there should be an off-site parking lot and then transfer the attendees by shuttle bus to the Gardens. We also request that the Events be limited to 4.

FIRE AND EMERGENCIES IN THE GARDENS

The Garden is not equipped to handle fires and emergency situations within the garden itself. There is no access available for emergency vehicles such as ambulances, fire trucks and paramedics. Also, the pathways with the Garden are narrow and uneven.

If the attendees are increased to 200 people a day plus 24 private events a year, this will be a huge problem.

The draft SEIR ignored the risk of fire, but our neighborhood has been declared a High Risk Fire area.

We request that the Final SEIR have an emergency plan which spells out in detail how fire, medical and other emergencies will be handled, including that events will be cancelled on high-risk fire days.

148-1

Responses to Letter 148 – Tobi Lippman

Response to Comment 148-1:

Thank you for your letter regarding the Proposed Operational Changes at the Virginia Robinson Gardens Draft SEIR. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues. The commenter states that a number of issues were inadequately addressed in the Draft SEIR including parking, traffic, emergency access, and fire hazard.

Parking is discussed in Section 2.2.3, *Special Use Events*, on page 2-4 of the Draft SEIR and Section 2.4.5, *Parking*, beginning on page 3-29 of the Draft SEIR. Parking and traffic impacts associated with the Proposed Project are discussed in Section 4.18, *Transportation*, beginning on page 3-61 of the Draft SEIR. The County has also prepared a site-specific traffic impact assessment for the Proposed Project which is included as Appendix F of the Draft SEIR. Please refer to Master Response 1, Master Response 2, and Master Response 3.

Project impacts related to wildfire are specifically discussed in Section 3.10, *Hazards and Hazardous Materials*, beginning on page 3-21 of the Draft SEIR and Section 3.21, *Wildfire*, beginning on page 3-77 of the Draft SEIR. Please refer to Master Response 6 and Master Response 7.

Letter 149 - Nam Kim - September 5, 2022

From: [nam](#)
To: [Jui Ing Chien](#)
Subject: Re: Comments on Virginia Robinson Garden Expansion Plan
Date: Wednesday, September 7, 2022 7:54:15 AM

CAUTION: External Email. Proceed Responsibly.

Park Planner
County of Los Angeles
Department of Parks and Recreation
1000 S. Fremont Ave.
Unit #40 A-9 West, 3rd Floor
Alhambra, California 91083

Re: Comments on Virginia Robinson Garden Expansion Plan

Dear Ms. Chien and to Whom It May Concern:

1. Save the Virginia Robinson Garden from risks of fire and damages by the Private parties and events; and provide a comprehensive plan to prevent such risks;
2. Preserve the Virginia Robinson Garden Estate from mass visitors and show how the docent-led programs will be added and performed to ensure the estate is not ruined and damaged;
3. Disclose the Students' educational programs and its historic data and all other programs and activities in order to ensure the Garden has been used properly;
4. Disclose the outreach efforts made to improve the students' educational programs to benefit more students from L.A. County and especially Title 1 Schools;
5. Show the transparency on the maintenance costs and Friends of Robinson Garden's accounting for donations received and its expenditures;
6. Show how the private parties will be booked and managed fairly without making the Estate an exclusive backyard for some connected people and provide a rationale for what makes this expansion a public benefit;
7. Listen to the neighborhoods to their concerns, and provide mitigation measures which will protect the neighborhood; and
8. Honor the original donor agreement, and provide an explanation of why L.A. County believes they can break the agreement.

149-1

149-2

149-3

Sincerely,

Nam Kim 340 S. Roxbury Drive, Beverly Hills, CA. 90212

Responses to Letter 149 – Nam Kim

Response to Comment 149-1:

Please refer to Response to Comment 83-1. This comment is noted.

Response to Comment 149-2:

Please refer to Response to Comment 83-2. This comment is noted.

Response to Comment 149-3:

Please refer to Response to Comment 83-3. This comment is noted.

4.0 REVISIONS TO THE DRAFT SEIR

4.1 Introduction

Evaluation of the comments submitted on the Draft SEIR impact analysis determined that the comments received did not require additional evaluation or changes to the conclusions reached, or alternatives to the Proposed Project. Changes or clarifications to the Draft SEIR were made in response to some of the comments to the Draft SEIR. All such changes are shown in underline for new text.

These changes and clarifications are provided in this section of the Final SEIR as errata to the text in the Draft SEIR. None of the changes contain significant new information that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the Proposed Project or a feasible way to mitigate or avoid such an effect.

All of the information added to the Final SEIR merely clarifies, amplifies, or makes insignificant modifications in the Draft SEIR. Therefore, recirculation of the Draft SEIR is not required (see CEQA Guidelines Section 15088.5).

4.2 Draft SEIR Errata

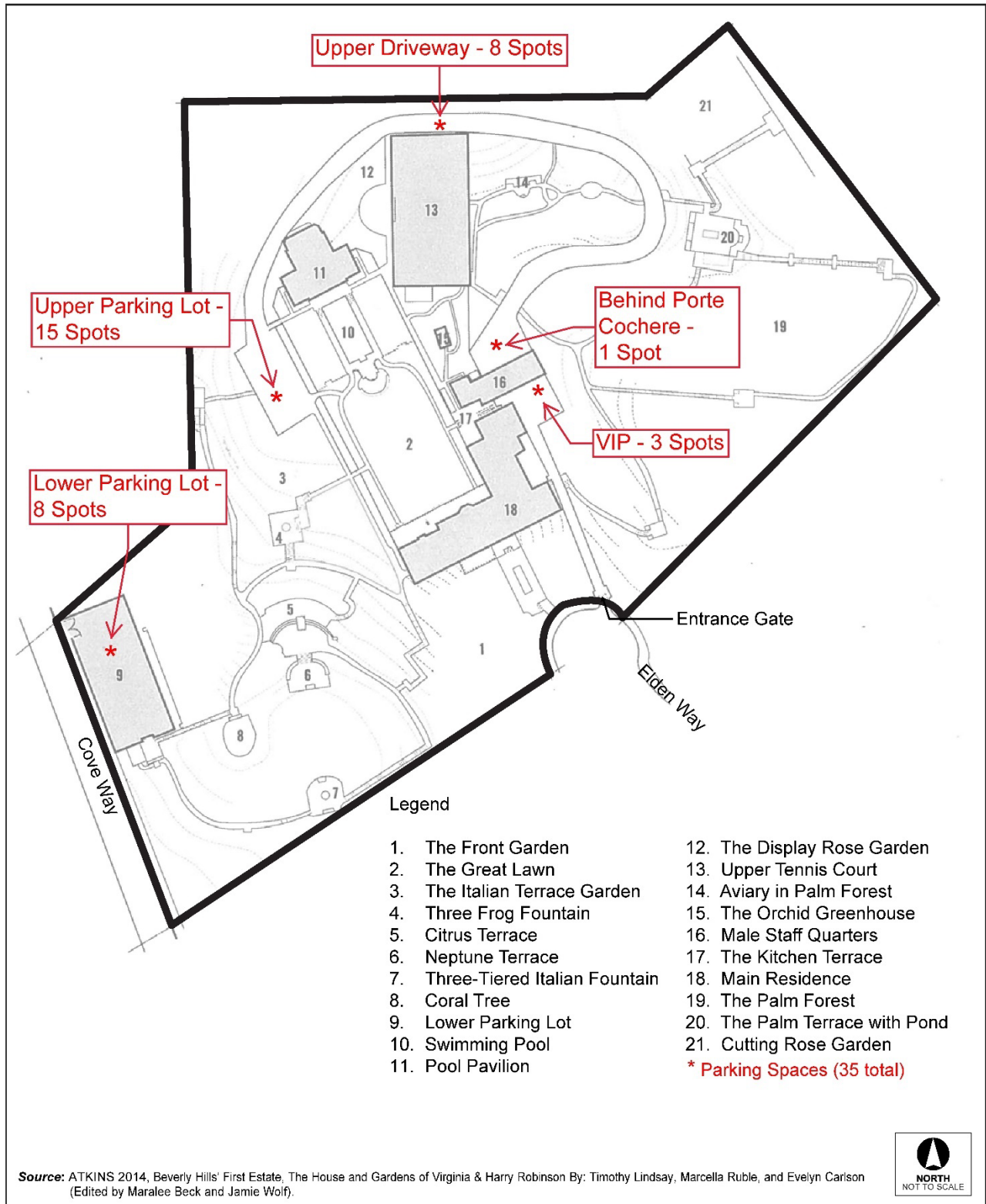
Text Revision to Section 2.4.5, Parking

The first paragraph on page 2-8 of the Draft SEIR shall be revised as follows:

Parking on the property will remain the same (35 spaces available) and there will continue to be no parking on Elden Way. Please see Figure 2-3.

Figure Addition to Section 2.4.5, Parking

Figure 2-3. *Virginia Robinson Gardens Parking Map* shall be added to page 2-9 of the Draft SEIR. This figure is presented on the following page.



5.0 MITIGATION MONITORING AND REPORTING PROGRAM

The Mitigation Monitoring and Reporting Program (MMRP) for the Proposed Operational Changes at the Virginia Robinson Gardens follows this page.

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Proposed Operational Changes at the
Virginia Robinson Gardens
Final Supplemental Environmental Impact Report

Mitigation Monitoring And Reporting Program
Proposed Operational Changes At The Virginia Robinson Gardens

Mitigation Measures	Responsible for Implementation	Timing of Implementation	Potential Agency Coordination	Date Completed
Noise				
<p>NOI-1: A noise-reduction operations program shall be implemented prior to all Special Use Events employing the use of amplified sound:</p> <ul style="list-style-type: none"> ▪ Property owners and occupants located within 500 feet of the Virginia Robinson Gardens boundary shall be sent a notice, at least five (5) days prior to commencement of all Special Use Events employing the use of amplified sound. All notices shall be reviewed and approved by the County of Los Angeles Department of Parks and Recreation prior to mailing and shall indicate the dates and duration of the upcoming special event, as well as provide a contact name and a telephone number where residents can inquire about the special event and register complaints. ▪ No Special Use Events shall take place outside of the allowable hours specified by the City of Beverly Hills Municipal Code Title 5, Chapter 1, 	County of Los Angeles Department of Parks and Recreation	During all Special Use Events employing the use of amplified sound. Property owners and occupants located within 500 feet of the Virginia Robinson Gardens boundary shall be sent a notice, at least five (5) days prior to commencement of all Special Use Events employing the use of amplified sound.	City of Beverly Hills	

Proposed Operational Changes at the
Virginia Robinson Gardens
Final Supplemental Environmental Impact Report

Mitigation Measures	Responsible for Implementation	Timing of Implementation	Potential Agency Coordination	Date Completed
<p>Noise Regulations (10:00 p.m. through 8:00 a.m.).</p> <ul style="list-style-type: none">▪ The sound amplification system accommodating Special Use Events with amplified music shall include a processor to control the maximum output of the speakers, so that even if a microphone were to be shouted into, the resulting sound power levels would be controlled to the maximum allowable level programmed into the processor. The maximum output noise level shall be set to 80 dBA Lmax as measured at one meter (3.28 feet) from the source.				



www.ecorpconsulting.com

REDLANDS, CA
(909) 307-0046

SAN DIEGO, CA
(858) 275-4040

ROCKLIN, CA
(916) 782-9100

CHICO, CA
(530) 805-2585

FLAGSTAFF, AZ
(858) 232-9602

SANTA ANA, CA
(714) 648-0630

SANTA FE, NM
(714) 222-5932