

LOS ANGELES COUNTY
DEPARTMENT OF PARKS
AND RECREATION
**PROPOSED OPERATIONAL
CHANGES TO THE
VIRGINIA ROBINSON GARDENS
Final Supplemental EIR**

Volume I: Final SEIR and Recirculated Final SEIR

Prepared for
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INTRODUCTION TO THE FINAL SUPPLEMENTAL EIR

PROJECT LOCATION

The project site is located at 1008 Elden Way in the northern portion of the City of Beverly Hills, just north of the renowned Beverly Hills Hotel. The City of Beverly Hills is located in western Los Angeles County and is bound by the City of Los Angeles in all directions. The approximately 6.2-acre project site is generally bound by Elden Way to the south, Cove Way to the west, Carolyn Way to the north, and residential uses to the east. The site is located at the end of a cul-de-sac (Elden Way) in an established residential area of Beverly Hills. Figure 1 (Project Vicinity and Regional Location Map) illustrates the project site's regional location and vicinity.

PROJECT DESCRIPTION

To meet the current primary goals of the Virginia Robinson Gardens, the proposed project includes revisions to the operational characteristics and public accessibility of the project site, requiring modifications to the operational limitations established in the 1980 EIR.

The following operational revisions are proposed:

- Days open to the public: Monday to Saturday (6 days per week), closed Sundays; all holidays, with the exception of Thanksgiving, Christmas Day and New Year's Day
- Hours for public use: 6.5 hours per day (9:30 AM to 4:00 PM)
- Number of patrons in attendance: Maximum of 100 visitors per day with advanced reservations, in any combination of the currently allowed uses (tours, classes/seminars, commercial filming, etc.)
- Types of events: Public programs to conform to new days/hours and number of participants allowed; however, subject matter for seminars/classes to be determined at the discretion of the Park Superintendent based on how well the classes interpret the historical collections of Mrs. Robinson. This includes continuation of the use of the site for tours of the grounds for biology, botany, and horticulture groups.
- Special Uses: Limited to four per year, with expanded themes. Themes would be determined at the discretion of the Park Superintendent. Programs must continue to focus on the historical interpretation of the facility. For special uses, there would be no restrictions on the number of guests or hours/day of operations; however, tickets would be sold to regulate the number of visitors to assure safety and a quality experience. Additionally, the event voluntarily complies with city ordinances, which require no amplified music after 10:00 PM, and valet service must obtain city parking permits for use of public streets to avoid overlapping events with surrounding neighbors.
- Parking: All parking requires advanced reservation, as follows:
 - > Parking required on the property (22 spaces, upper parking lot, entrance off Elden Way)
 - > No street parking permitted on Elden Way, including along Elden Way. Further, a sign will be posted on the property indicating that no parking on Elden Way is allowed for visitors
 - > With advanced reservation, visitors would be allowed to walk to the gardens from nearby public streets pursuant to street signs; visitors could also walk to the gardens from public transportation (primarily buses, but also to include taxi)

- > Allow visitors to be dropped off at the entrance of the gardens (e.g., via the City of Beverly Hills free ride for disabled residents)
- > Overflow visitor parking (valet) and staff/volunteer parking allowed on the lower tennis court, accessed from Cove Way (20 cars)

SUMMARY OF CEQA DOCUMENTATION PREPARED FOR THE PROJECT

The Draft Supplemental EIR (Draft SEIR) for the proposed project was circulated for review and comment by the public for a 30-day review period that began on September 13, 2012, and concluded on October 12, 2012. In response to the Draft SEIR, 35 written letters were received during the review period: one from a state agency, one from a local agency, and 33 from private individuals. The local agency response was received from the City of Beverly Hills, identifying their Local street thresholds for traffic impacts.

In response, the County of Los Angeles (County) initiated a review of the City of Beverly Hills thresholds and analysis of project impacts. Within Los Angeles County, including the Cities of Los Angeles and Beverly Hills, the widely-accepted and required traffic analysis method is a measure of the performance of an intersection based on traffic congestion, expressed in terms of intersection level of service (LOS) and volume-to-capacity (V/C) ratios. This was accurately prepared for the proposed project and reflected in the DSEIR.

Varying from this, the City of Beverly Hills local street threshold is based on the existing average daily trips (ADT) and the proposed increase in ADT. In the case of Elden Way, a roadway with ADT less than 2,000 volume per day, a significant impact would result if the project increases ADT by 16 percent, or increases peak hour [trips] by 16 percent, or both. As the proposed project will not change operations substantially during weekdays, the increase in traffic volumes along Elden Way during weekday operation would not be substantial and would not result in an increase that would exceed the City's local street threshold. However, based on the anticipated Opening Year ADT along Elden Way, the addition of approximately 160 project trips on Saturdays would result in an increase greater than the City's threshold of 16 percent, resulting in a significant impact, by percentage. However, this impact would not create an operational impact along Elden Way or the surrounding intersections. This is summarized in the Responses to Comments on the Draft SEIR section of this document, at Response BEV-1.

In order to reduce this potential impact, project-related trip volumes on Saturdays would have to be reduced below 40 ADT, which would be impractical, operationally infeasible, and would preclude the proposed project from meeting the identified Project Objectives. As such, an analysis of off-site parking opportunities was completed to address the feasibility of reducing the number vehicular trips at the project site on Saturday below 40 to conform to the City's Local street threshold. This analysis included an in-depth study of the potential use of five local parking alternatives including Greystone Mansion and Park, the Beverly Hills Women's Club, City of Beverly Hills parking structures (two), and the use of the Cove Way parking area (included at Appendix G of this document, appended as part of preparation of the Final SEIR). In summary, this analysis determined that the use of off-site parking opportunities was not feasible and the project was determined to result in a significant and unavoidable traffic impact that was not previously identified in the Draft SEIR.

Per the requirements of CEQA Guidelines Section 15088.5, “a Lead Agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification.” Section 15088.5 establishes the parameters for “significant new information” requiring recirculation, which can include:

- A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented
- 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
- A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project’s proponents decline to adopt it
- The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (*Mountain Lion Coalition v. Fish & Game Com.* (1989) 214 Cal.App.3d 1043)

In response to the first bullet, a new significant environmental impact, the County identified the need to recirculate the Draft SEIR. At that time, the Final Supplemental EIR (Final SEIR) had been prepared which provided more information for public review than a revised Draft SEIR would have, and incorporated by reference the Draft SEIR. As such, the County recirculated the Final Supplemental EIR (Recirculated Final SEIR) from June 12, 2014, to July 11, 2014. This document included Text Changes to the Draft SEIR initiated by the County and in response to comments received, as well as responses to all comments received. This Final Supplemental EIR (Final SEIR) has been prepared based on, and incorporating, the Recirculated Final SEIR, mirroring the process of recirculation of a Draft EIR.

CEQA REQUIREMENTS REGARDING THE FINAL EIR

Before approving a project that may cause a significant environmental impact, the California Environmental Quality Act (CEQA) requires the Lead Agency to prepare and certify a Final Environmental Impact Report (EIR). In the case of the proposed project at Virginia Robinson Gardens, the Final EIR would be in the form of a Final Supplemental EIR or Final SEIR, as noted in the discussion above. The contents of a Final EIR/SEIR are specified in CEQA Guidelines Section 15132, which states that:

The Final EIR shall consist of:

- (a) The Draft EIR or a revision of the Draft EIR.
- (b) Comments and recommendations received on the Draft EIR either verbatim or in summary.
- (c) A list of persons, organizations, and public agencies commenting on the Draft EIR.
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- (e) Any other information added by the Lead Agency.

The County of Los Angeles as Lead Agency must also provide each public agency that commented on the Draft SEIR and Recirculated Final SEIR with a copy of County’s response to those comments at least 10 days before certifying the Final SEIR. In addition, the County may also provide an opportunity for members of the public to review the Final SEIR prior to certification, though this is not a requirement of CEQA.

PUBLIC REVIEW PROCESS

The Draft SEIR for the Proposed Operational Changes to Virginia Robinson Gardens Project (proposed project) was circulated for review and comment by the public, agencies, and organizations for a 30-day public review period that began on September 13, 2012, and concluded on October 12, 2012. In response to the Draft SEIR, 35 written letters were received during the review period: one from a state agency, one from a local agency, and 33 from private individuals.

The Recirculated Final SEIR was circulated for review and comment by the public, agencies and organizations for a 30-day period from June 12, 2014, to July 11, 2014. In response to the Recirculated Final SEIR, 114 written letters were received during the review period: two from local agencies, and 112 from private individuals.

CONTENTS AND ORGANIZATION OF THE FINAL SEIR

This Final SEIR is composed of two volumes. They are as follows:

Volume I **Final SEIR (Text Changes and Responses to Comments to Recirculated Final SEIR)**—This volume contains an explanation of the format and content of the Final SEIR; a complete list of all persons, organizations, and public agencies that commented on the Recirculated Final SEIR; copies of the comment letters received by the Los Angeles County Department of Parks and Recreation on the Recirculated Final SEIR; and the Lead Agency’s responses to these comments. While the proposed project would result in a significant and unavoidable traffic impact, no feasible mitigation was identified. However, Appendix G presents the potential use of off-site parking options, albeit these options were determined to be infeasible.

Recirculated Final SEIR (Text Changes and Responses to Comments to Draft SEIR)—This volume contains an explanation of the format and content of the Draft SEIR; all text changes to the Draft SEIR; a complete list of all persons, organizations, and public agencies that commented on the Draft SEIR; copies of the comment letters received by the Los Angeles County on the Draft SEIR; and the Lead Agency’s responses to these comments.

Volume II **Draft SEIR**—This volume describes the existing environmental conditions in the project area and in the vicinity of the proposed project, and analyzes potential impacts on those conditions due to the proposed project; evaluates cumulative impacts that would be caused by the proposed project in combination with other past, present, and future projects or growth that could occur in the region; and analyzes growth-inducing impacts. No potentially significant and unavoidable impacts were identified with respect to the proposed project; accordingly, no mitigation measures were proposed. Text revisions to the Draft SEIR resulting from corrections of minor errors and/or clarification of items are identified in Volume I. The Draft SEIR is incorporated by reference into the Final SEIR.

USE OF THE FINAL SEIR

Pursuant to CEQA Guidelines Sections 15088(a) and 15088(b), the lead agency must evaluate comments on environmental and CEQA-related issues received from persons who reviewed the Draft SEIR and must prepare written responses to each of these comments. In this case, the lead agency need also prepare written responses to each of the comments received on the Recirculated Final SEIR. The Final SEIR allows the public and the County of Los Angeles an opportunity to review the response to comments, revisions to the Draft SEIR, and other components of the SEIR, prior to the County Board of Supervisor's decision on the project. The Final SEIR serves as the environmental document to support approval of the proposed project, either in whole or in part.

After completing the Final SEIR, and before approving the project, the Lead Agency must make the following three certifications as required by CEQA Guidelines Section 15090:

- That the Final SEIR has been completed in compliance with CEQA
- That the Final SEIR was presented to the decision-making body of the Lead Agency, and that the decision-making body reviewed and considered the information in the Final SEIR prior to approving the project
- That the Final SEIR reflects the Lead Agency's independent judgment and analysis

Pursuant to CEQA Guidelines Section 15091(a), if an EIR that has been certified for a project identifies one or more significant environmental effects, the lead agency must adopt "Findings of Fact." For each significant impact, the lead agency must make one of the following findings:

1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR.
2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

Each finding must be accompanied by a brief explanation of the rationale for the finding. In addition, pursuant to CEQA Guidelines Section 15091(d), the agency must adopt, in conjunction with the findings, a program for reporting on or monitoring the changes that it has either required in the project or made a condition of approval to avoid or substantially lessen environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures. This program is referred to as the Mitigation Monitoring and Reporting Program (MMRP). However, as disclosed above and throughout the Draft SEIR, no potentially significant and unavoidable impacts were identified as a result of the proposed project. Accordingly, no mitigation measures were proposed or incorporated into the proposed project or the Draft SEIR. Further, a Statement of Overriding Considerations is not necessary to meet the requirements of CEQA Guidelines Section 15093(b).

CHANGES TO THE RECIRCULATED FINAL SUPPLEMENTAL EIR

Text changes are intended to clarify or correct information in the Recirculated Final SEIR in response to comments received on the document, or as initiated by the Lead Agency staff. Revisions are shown in Section 9.2 (Text Changes) as excerpts from the Recirculated Final SEIR text, with a ~~line through~~ deleted text and a double underline beneath inserted text. In order to indicate the location in the Recirculated Final SEIR where text has been changed, the reader is referred to the page number of the Recirculated Final SEIR as published on June 12, 2014, the start of the public comment period.

TEXT CHANGES

Although the Recirculated Final SEIR was available for public comment for thirty days, none of the comments received required any text changes to the Recirculated Final SEIR.

RESPONSES TO COMMENTS ON THE RECIRCULATED FINAL SUPPLEMENTAL EIR

ORGANIZATION OF THE RESPONSES TO COMMENTS

This chapter of the Final SEIR contains all comments received on the Recirculated Final SEIR during the public review period, as well as responses to each of these comments. Reasoned, factual responses have been provided to all comments received, with a particular emphasis on significant environmental and CEQA-related issues. Detailed responses have been provided where a comment raises a specific issue; however, a general response has been provided where the comment is relatively general. Although some letters may raise legal or planning issues, these issues do not always constitute significant environmental issues or issues as defined by CEQA. Therefore, the comment has been noted, but no response has been provided. Where appropriate, the responses to comments provide explanation or amplification of information contained in the Recirculated Final SEIR.

In total, 114 comment letters regarding the Draft SEIR were received from two local agencies and 112 private individuals. Table 1 (Comment Letters Received during the Recirculated Final SEIR Public Review Period) provides a comprehensive list of comment letters in the order that they are presented in this section.

Table 1 Comment Letters Received during the Recirculated Final SEIR Public Review Period					
<i>No.</i>	<i>Commenter/Organization</i>	<i>Letter Code</i>	<i>Letter Date</i>	<i>Page Where Comment Begins</i>	<i>Page Where Response Begins</i>
Agency					
1	City of Beverly Hills Parks and Recreation Commission	BEV1	7/4/2014	11	11
2	City of Beverly Hills Cultural Heritage Commissioner	BEV2	7/11/2014	12	12
Individuals					
3	Ashley Allen	ALL	6/30/2014	13	14
4	Laura Alpert	ALP1	6/14/2014	14	14
5	Charles Alpert	ALP2	6/18/2014	15	17
6	Harvey Alpert	ALP3	6/23/2014	22	22
7	Jeanne Anderson	AND	6/17/2014	23	23
9	Suzanne Baird	BAI	6/29/2014	23	23
10	Cindy Baker	BAK	7/11/2014	24	24
11	Bernice Balson	BAL	6/27/2014	24	24
12	Terry Bass	BAS	7/11/2014	25	25
13	Barbara Bennett	BEN1	7/4/2014	26	26
14	Carolyn Bennett	BEN2	7/4/2014	27	27
15	David and Susan Bewley	BEW	6/29/2014	27	27
16	Keith Bieber	BIE	6/27/2014	28	28

Table 1 Comment Letters Received during the Recirculated Final SEIR Public Review Period

No.	Commenter/Organization	Letter Code	Letter Date	Page Where Comment Begins	Page Where Response Begins
17	Lisa Bittan	BIT	6/13/2014	28	28
18	Mary Bosak	BOS	6/22/2014	29	29
19	Emily Boyle	BOY	6/16/2014	30	30
20	Susan Brauneiss	BRA	6/30/2014	31	31
21	Ellisa Bregman	BRE1	6/16/2014	32	32
22	Grace Breuer	BRE2	6/27/2014	32	32
23	Marcy Brubaker	BRU	6/13/2014	33	33
24	Evelyn Carlson	CAR	6/16/2014	33	34
25	Ann Christie	CHR	7/7/2014	34	34
26	Angela Cohan	COH1	6/28/2014	35	35
27	Ben Cohan	COH2	6/29/2014	35	36
28	Susan Cohen	COH3	7/3/2014	36	36
29	Pamela Collingwood	COL	7/8/2014	37	37
30	Cynthia Comsky	COM1	6/27/2014	37	38
31	Neil and Ruth Cuadra	CUA	7/10/2014	38	38
32	Art Curtis	CUR	7/5/2014	39	39
33	Paige Doumani	DOU	7/10/2014	40	40
34	Diana Doyle	DOY1	6/13/2014	40	40
35	Diana Doyle	DOY2	6/13/2014	41	41
36	Regina Drucker	DRU	6/13/2014	41	41
37	Mary Estrin	EST	7/3/2014	42	42
38	Krista Everage	EVE1	6/13/2014	42	43
39	Krista Everage	EVE2	6/28/2014	43	43
40	Lynda Fadel	FAD	7/1/2014	44	44
41	Cynthia Fields	FIE1	6/28/2014	44	45
42	Kara Fox	FOX1	6/24/2014	45	45
43	Kara Fox	FOX2	6/27/2014	46	46
44	Teri Fox-Stayner	FOX3	6/13/2014	46	47
45	Suzanne Freedman	FRE	6/14/2014	47	47
46	Ellen Friedmann	FRI1	7/3/2014	47	48
47	Ann Garber-Rimoin	GAR	6/27/2014	48	48
48	Betty Goldstein	GOL	6/27/2014	49	49
49	Maggi Gordon	GOR	6/27/2014	50	50
50	Joann Gottlieb	GOT	6/30/2014	50	50

Table 1 Comment Letters Received during the Recirculated Final SEIR Public Review Period

No.	Commenter/Organization	Letter Code	Letter Date	Page Where Comment Begins	Page Where Response Begins
51	Sandra Harris	HAR	7/4/2014	51	51
52	Paula Henson	HEN	6/27/2014	51	51
53	Laura Herrmann	HER1	7/10/2014	52	52
54	Doris Herzog	HER2	7/11/2014	52	52
55	Chery Horacek	HOR1	7/3/2014	53	53
56	Adrienne Horwitch	HOR2	7/8/2014	53	53
57	Jeff Hyland	HYL	6/24/2014	54	54
58	Donna Jett	JET	6/13/2014	54	54
59	Jorge Jimenez	JIM	6/27/2014	55	55
60	Gregory and Barbara Johnston	JOH1	6/30/2014	55	55
61	Joshua Johnston	JOH2	7/10/2014	56	56
62	Dorothy Kamins	KAM1	6/14/2014	56	56
63	Jackie Kassorla	KAS	6/28/2014	57	57
64	Suzanne Kayne	KAY	6/27/2014	57	58
65	Lauren King	KIN	7/3/2014	58	58
66	Julia Klein	KLE1	6/16/2014	59	59
67	Andrew Klein	KLE2	7/2/2014	60	60
68	Carole Kramer	KRA	7/10/2014	61	61
69	Suz Landay	LAN1	7/14/2014	62	62
70	Lynda Levy	LEV1	7/9/2014	63	63
71	Lynne Lertzman	LER	7/7/2014	64	64
72	Alfredo Llamedo	LLA	6/30/2014	64	65
73	Diana Lombardi	LOM	7/10/2014	65	65
74	Kathleen Luckard	LUC1	6/13/2014	66	66
75	Kathleen Luckard	LUC2	6/27/2014	67	67
76	James Luckard	LUC3	7/3/2014	67	68
77	Linda McKendry	MCK	7/3/2014	68	68
78	David Merino	MER	6/27/2014	69	69
79	Nancy Miller	MIL1	6/19/2014	70	70
80	Laura Morton	MOR1	7/3/2014	71	71
81	Lulah Paulos	PAU	6/29/2014	72	72
82	Ann Peterson	PET	6/18/2014	72	72
83	Donald Philipp	PHI1	7/5/2014	73	74
84	Nancy Power	POW	7/3/2014	74	74

Table 1 Comment Letters Received during the Recirculated Final SEIR Public Review Period

No.	Commenter/Organization	Letter Code	Letter Date	Page Where Comment Begins	Page Where Response Begins
85	Jon Puno	PUN	6/27/2014	75	75
86	Patricia Reinstein	REI	6/14/2014	76	76
87	Ben Reznik	REZ	7/11/2014	77	80
88	Francine Rippy	RIP	7/1/2014	84	85
89	Susan Rosenthal	ROS1	6/20/2014	85	85
90	PA Ross	ROS2	6/17/2014	85	86
91	Kerstin Royce	ROY	6/16/2014	86	86
92	Marcella Ruble	RUB	6/16/2014	87	87
93	Lili Sandler	SAN	7/3/2014	87	88
94	Joan Selwyn	SEL	7/3/2014	88	88
95	Pam Shimizu	SHI	7/4/2014	88	88
96	Diane Sipos	SIP	6/27/2014	89	89
97	Tracy Smith	SMI	6/27/2014	89	89
98	Gwen Stauffer	STA	7/3/2014	90	91
99	Sydney Tanner	TAN1	7/9/2014	91	91
100	Mike Tang	TAN2	7/10/2014	92	92
101	Charles Tellalian	TEL1	6/15/2014	92	92
102	Alex Tesoriero	TES1	n.d.	93	93
103	Jaqueline Tesoriero	TES2	n.d.	94	94
104	Joseph Tesoriero	TES3	n.d.	95	95
105	Rolf Tillmann	TIL3	7/1/2014	96	96
106	Kathleen Toppino	TOP	6/27/2014	97	97
107	Andrew Tullis	TUL	6/27/2014	98	99
108	Tina Varjian	VAR	6/12/2014	99	99
109	Madeleine Wagner	WAG	6/21/2014	100	100
110	Katherine Winn	WIN	7/3/2014	100	101
111	J Dale Witt	WIT	7/7/2014	101	101
112	Jamie Wolf	WOL1	6/27/2014	102	102
113	Donna Wolff	WOL2	6/17/2014	103	103
114	Karen Wolfen	WOL3	7/7/2014	104	104

COMMENTS AND RESPONSES ON THE RECIRCULATED FINAL SEIR

This section contains the original comment letters, which have been bracketed to isolate the individual comments, each followed by responses to the individual, bracketed comments within that letter. As noted above, and stated in CEQA Guidelines Sections 15088(a) and 15088(b), comments that raise significant environmental issues are provided with responses. Comments that are outside of the scope of CEQA review do not merit a response, but are included within this Final SEIR and will be considered by the County of Los Angeles Board of Supervisors prior to certifying this Final SEIR and the proposed project. In some cases, a response may refer the reader to a previous response, if that previous response substantively addressed the same issues.

Agency

City of Beverly Hills Parks and Recreation Commission (BEV1), 7/4/2014

BEV1-1	<p>From: Robert Anderson [mailto:ardendr@pacbell.net] Sent: Friday, July 04, 2014 1:02 PM To: Joan Rupert Subject: Virginia Robinson Gardens</p> <p>Dear Jean, I am writing this to you on behalf of The City of Beverly Hills Parks and Recreation. We as a whole are supportive of the modifications to the amount of hours and the number of persons being able to see these gorgeous gardens and estate. They "The Friends of VRG " do such a magnificent job of preserving the integrity of The Virginia Robinson Gardens and Estate. Please allow the extended number of dates and hours as it will benefit Los Angeles as a whole. Thank You, Robert S. Anderson Commissioner Parks and Recreation</p>	BEV1
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Responses to City of Beverly Hills Parks and Recreation Commission (BEV1), 7/4/2014

BEV1-1 This comment is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

City of Beverly Hills Cultural Heritage Commissioner (BEV2), 7/11/2014



BEV2

Maralee Beck
Cultural Heritage Commissioner

July 11, 2014

To the LA County Board of Supervisors:

■ As Chairman of the Beverly Hills Cultural Heritage Commission – as well as a member of the Board of Governors for LA County Arboreta & Botanical Gardens -- I heartily endorse the proposed changes to the EIRS for the Virginia Robinson Gardens.

It is imperative to enlarge access and audience for this fantastic public resource. Our City Commission has named it Beverly Hills Historic Landmark #2, but it cannot participate in any of Beverly Hills' Centennial celebrations because it is closed to the public all week-end.

Restrictions prohibit taking public transportation to the Gardens – even though Sunset Boulevard and its extensive bus system is a mere two blocks away. Visitors are not allowed to walk up the public streets leading to the Gardens!!

No private buses that cannot squeeze underneath the driveway arch may bring visitors – the current EIRs disallow any dropping off of guests at the front entrance. Handicapped guests have further challenges if they are brought to gardens in special disabled vans: again, no one may be dropped off, so such guests are denied the ease of access of rolling down the driveway to see both the front gardens, the Italian Garden, the main estate, and the fabled Palm Garden.

School children – who can only visit in class groups because it is closed on all holidays and week-ends – cannot attend in regular school buses because those cannot fit under the archway, and again, there is no drop-off.

The working public may not easily attend, again because there are no holiday nor week-end visitations.

Adapting the revisions to the antiquated EIRS would remedy all these issues, and give the general public the ability to schedule tours and visits to this magical garden. That was the vision and intention of Virginia Robinson in gifting her estate and gardens to the County of Los Angeles. It is our obligation as custodians of this exquisite place, beautifully restored and maintained by the public/private partnership of the County and the Friends of Robinson Gardens, to see these changes adopted.

Very truly yours,

Maralee Beck

BEV2-1

Responses to City of Beverly Hills Cultural Heritage Commissioner (BEV2), 7/11/2014

BEV2-1 This comment provides anecdotal information regarding the commenter and is in support of the proposed project. The comment goes on to accurately summarize many of the project components and characteristics, including the reasons why these components are being addressed. As this comment is not a direct comment on the

content or adequacy of the Recirculated Final 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.

Individuals

Ashley Allen (ALL), 6/30/2014

	<p>From: Ashley Allen [mailto:ashleyal@usc.edu] Sent: Monday, June 30, 2014 1:42 PM To: Joan Rupert Subject: Virginia Robinson Gardens</p>	ALL
	<p>June 30, 2014</p> <p>Dear Joan Rupert,</p>	
ALL-1	<p>My name is Ashley Allen, and I am a resident of Los Angeles who recently visited Virginia Robinson Gardens for the first time. I was astonished by this local treasure, and strongly feel that it should increase its hours and visibility so the public can learn more about the historic property as well as gardening/nutrition through interacting with the gardens onsite. <u>I strongly support the proposed operational changes to The Virginia Robinson Gardens. In particular, the additional project trips on Saturdays.</u></p>	
	<p>Sincerely,</p> <p>Ashley Allen 1441 Veteran Ave, Apt 222 Los Angeles, CA 90024</p> <p>Ashley Allen Graduate Student Annenberg School for Communication University of Southern California C: 408.799.8558 E: ashleyal@usc.edu</p>	

Responses to Ashley Allen (ALL), 6/30/2014

ALL-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Laura Alpert (ALP1), 6/14/2014

From: Laura Alpert [<mailto:ljalpert@aol.com>]
Sent: Saturday, June 14, 2014 11:23 PM
To: Joan Rupert
Subject: Virginia Robinson Gardens

ALP1

Dear Joan,
My niece Emily first introduced me to
The Virginia Robinson Gardens in/ around 1996. She took me to one of the '...Into the Garden'
Garden Tours that May. It was just a wonderful day I couldn't believe something like this
existed right here in our backyard, so to speak. I was so charmed by the estate that I
decided to get in involved with the Friends of Robinson Gardens. Everytime I walk or Drive
through those gates I get that same magical feeling of being transported to a different era. A
genteel place of history, culture and nature. Peaceful and educational. I wanted to share
this feeling with everyone. I joined the Board of Directors and volunteered my time and
expertise. Through the years I've held many positions on the Board.

APL1-1 Whenever I talk about this hidden jewel to people and they see the place for themselves
through a public Tour, educational lectures, or our two events we have for fundraising,
people are amazed that this wonderful venue isn't used more and opened on a Saturday for all
to enjoy. Especially exposing the children who soak up the knowledge of the earth, garden and
food grown there. If we were allowed to hold more events, possibly open even a few evenings
for special events we could raise the most needed monies necessary to keep this Historic Site
and Mrs. Robinson's' vision in pristine condition and expose more people to the magic that
exists right here in our county. As far as I know there is nothing like it, and it really
needs to be shared for all to enjoy as I do.

Respectfully,
Laura Alpert
Sent from my iPhone

Responses to Laura Alpert (ALP1), 6/14/2014

ALP1-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Charles Alpert (ALP2), 6/18/2014

	<p style="text-align: right; font-weight: bold; font-size: 1.2em;">ALP2</p> <p>June 18, 2014</p> <p>Sent via email to jrupert@parks.lacounty.gov</p> <p>Joan Rupert County of Los Angeles Department of Parks and Recreation 510 South Vermont Avenue, Room 201 Los Angeles, CA 90020</p> <p>Re: <u>Proposed Operational Changes to the Virginia Robinson Gardens</u> Comments on the Recirculated Supplemental Environmental Impact Report</p> <p>Dear Ms. Rupert:</p> <p>Having lived in the Beverly Hills neighborhood adjacent to the Virginia Robinson Gardens for more than fifteen years, I have been fortunate to appreciate its beauty and historic significance. Despite my appreciation for the Gardens, I believe the proposed mitigation (via schedule and operational limitations) remain inadequate to address the under analyzed environmental impacts.</p> <p>ALP2-1 As an overview, I am especially opposed to the “commercialization” of the Gardens under the guise of affording greater public access. The neighborhood’s tax dollars supports the Gardens as much as any other county taxpayer. Our neighborhood deserves equal respect versus the push for expanded “public access.” Indeed, the original 1980 EIR balanced those interests. This Supplemental DEIR and the Recirculated Supplemental Environmental Report effectively ignores that delicate balance for the following reasons:</p> <ol style="list-style-type: none"> 1. The Current Environmental Analysis disregards the most probably use of the Gardens. <p>ALP2-2 One does not need to be clairvoyant to understand that the Gardens seeks the extended days, additional themed events, filming rights and increased visitors a day to host revenue generating events, such a weddings and other social gatherings. These types of events exacerbate the environmental impacts as the accumulated impact of the traffic and noise condense in a short time frame. The Recirculated Supplemental EIR does not account for use of the Gardens as a catering and special event commercial establishment. It should. More importantly, such use of the Gardens reflects an incompatible use of the Robinson estate compared to the neighborhood.</p> <p>The Gardens seek to undertake activities that no neighboring homeowner could undertake due to Beverly Hills restrictions. The city imposes limits on filming, requirements for street and valet parking plus noise limits. Despite the fact that many adjoining estates could accommodate more visitors and more cars than the Gardens, the city appropriately restricts such events. The reason is obvious: the neighborhood surrounding the Gardens remains a valued residential area. Commercial activities in Beverly remain in zoned Commercial areas.</p> <p>Incidentally, considering the Gardens as a commercial establishment will adversely modify the results of the environmental modeling for the project. I urge the County to revise the Recirculated Supplemental EIR accordingly.</p>
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2. No logical reason exists to even undertake or consider a Supplemental Environmental Review; the initial 1980 Environmental Impact Review process remains valid and compelling.

The bias of the DEIR reflects an obvious one. The document at every crucial point ignores the 1980 mitigation which by implication implies the prior analysis to be incorrect. This omission represents an improper editorial prejudice throughout the document. Indeed, the Recirculated Supplemental EIR, aside from a mention in the history section, never incorporates the analysis and mitigation of the original EIR. CEQA does not allow for erasing of impact analysis and mitigation.

ALP2-3

A related fundamental legal flaw exists. The original EIR contained appropriate mitigation for the environmental impacts in 1980. The threshold for nuisance conditions has sharply risen in thirty plus years. Few can argue today that environmentally and socially the neighborhood is better off today than 30 years ago. A fair analysis will not suggest a different result. Yet, the DEIR does not seek to compare the impacts in 1980 to today's impact. The Supplemental EIR ignores the thirty year change in conditions and increase in background environmental impacts as of 1980. If anything, the restrictions on the Gardens based on relative environmental impacts should justify more restrictive conditions than those imposed in 1980.

The Recirculated Supplement DIR acts as if everything just starts fresh because the County wants a broader use for the Gardens. CEQA does not countenance this rule. You cannot treat environmental values in a vacuum. Stated otherwise, a supplemental environmental impact report cannot ignore the findings of the original EIR. CEQA protects against this form of analytical hocus pocus. CEQA stands for a full and fair evaluation. Legally, the Supplemental EIR will fall to a legal challenge on these policy grounds alone.

3. The Operation limitations are inadequate to mitigate the environmental impacts.

The table bellows addresses the inadequacies of the proposed "mitigation."


Limitation	Alternatives Not Discussed
Days Open To Public	<ul style="list-style-type: none"> The Gardens should remain closed on Saturdays. By comparison, the City precludes business activities in residential areas, such as construction activities, on Saturdays. Educational activities can occur Monday through Friday without impairment. No reasonable justification exists to support keeping the Gardens open on holidays. Nearby residents want to enjoy these holiday times without commercial activities.
Hours For Public Use	<ul style="list-style-type: none"> Why not 11:00 to 4 PM? Why not the current schedule?
Number of Patrons	<ul style="list-style-type: none"> Why not a limit to the number of patrons at the garden at a particular time rather than a limit per day. 100 patrons a day facilitate a large wedding or special event.
Types of Events	<ul style="list-style-type: none"> Why not continue the existing limitation to events related to the

ALP2-4

ALP2-5

ALP2-6

ALP2-7

ALP2-7 cont.		<p>inherent nature of the Gardens?</p> <ul style="list-style-type: none"> • How can you weigh the impact of events when it is at the subject of the discretion of the Superintendent? The Superintendent represents an obvious bias contrary to a balanced interest. • Why not preclude weddings and catered affairs (except for permitted fund raisers)
ALP2-8	Commercial Filming	<ul style="list-style-type: none"> • Why not limit such events consistent with Beverly Hills ordinances? The city limits the number of filming events and requires neighbor consent for such events.
ALP2-9	Special Uses	<ul style="list-style-type: none"> • Why not conduct additional fund raising at outside venues capable of supporting large crowds? Many charities raise money at hotels and other public venues located in commercial areas. Some non-profits raise money without venues through raffles and other means. • No discussion is included on how additional or extended Garden promotional events would appreciably increase revenues. In fact, increased events may lead to reduced revenues as only so much money realistically can be raised. The number of events only adds costs, not necessarily increased revenues.
ALP2-10		
ALP2-11	Parking	<ul style="list-style-type: none"> • Why not limit parking entirely to off site locations with transport to Gardens? Greystone Park operates this way for large events. • Why make arrangements with the hotel for parking? • Why not continue ban on walk-up patrons? It is unrealistic to believe many patrons will take a bus to the Gardens. Taxis trigger air emissions as much as a car.
ALP2-12		
ALP2-13	<p>The voices of the supporters of the Garden are many. I too support the Gardens, but not the change to the existing restrictions. Numbers alone should not count when it comes to CEQA – else many of our environmental treasures and open spaces would be amusement parks and shopping centers. Too many fatal flaws exist for this Recirculated Supplemental EIR. The original mitigation of the 1980 EIR merits the County’s full support with perhaps a minor adjustment or two – nothing as drastic as proposed. This option may be an unpopular decision, but the only wise decision in the long-term interests of the Gardens, the county and Beverly Hills residents.</p> <p>Respectfully,</p>  <p>Charles Alpert calpert@hotmail.com</p> <p>Beverly Hills Resident and Neighbor to the Gardens</p> <p>cc. Honorable Mayor and City Council Members, City of Beverly Hills, California</p>	

Responses to Charles Alpert (ALP2), 6/18/2014

ALP2-1 This comment provides introductory material from the commenter, including the fact that they have been a fifteen year neighbor to the project site. The commenter also expresses opposition to "... commercialization of the Garden under the guise of

affording greater public access.” Further, the commenter suggests that the “original EIR” balanced the interests of the neighborhood with perceived impacts of the operation of Virginia Robinson Gardens; concluding that the Draft SEIR effectively ignores a balance. 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. Further, contrary to the commenter’s suggestion, commercialization of the Virginia Robinson Garden is not proposed under the project; rather, the project proposes the continuation of existing uses at the project site while making minor operational changes. All comments will be forwarded to decision-makers prior to consideration of project approval.

ALP2-2

The commenter suggests that the proposed changes to the operating characteristics of the Virginia Robinson Gardens are being undertaken specifically to host revenue-generating events such as weddings and social gatherings, noting that these types of events exacerbate impacts to traffic and noise by shortening the period of time over which they happen. Further, the commenter notes that the Recirculated Final SEIR does not account for use of the Virginia Robinson Gardens as a commercial establishment, noting that this is an inconsistent use in the neighborhood. Finally, the commenter notes that the City of Beverly Hills has restrictions on filming.

Regarding the use of the project site for social gatherings, as discussed on Draft SEIR p. 4, as well as listing five specific restrictions to the type of event that can be hosted, the following restriction is added, “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.” As such, private uses such as weddings are not anticipated. Further, the noise and traffic impacts associated with larger-scale events were analyzed in the Draft SEIR as the characteristics of such impacts would be the same regardless of whether the event is a garden tour with 400 guests or a wedding with 400 guests. No further analysis is necessary.

With regard to the lack of consideration of the project site as a commercial venture, the commenter is correct that the Draft SEIR and the Recirculated Final SEIR did not consider the site as such because it is not. As discussed in the Land Use Section of the Draft SEIR, “the project site has a General Plan designation of Single Family Residential, Low Density. Consistent with this designation, the project site is zoned R-1.X (One-Family Residential Zone). This zoning and General Plan designation is the same for the surrounding, established residential area of Beverly Hills that is developed with large lot, well landscaped and manicured, secured residential manors.” Further, “Approval of the proposed project would amend the operational stipulations of the 1980 EIR; however, the changes are consistent with the existing uses of the project site, as they are effectively a continuation or increase of the existing uses, thereby not introducing new uses on site.” As such, the proposed project is not treated as a

commercial venture and was not analyzed as such in the Draft SEIR or the Recirculated Final SEIR. No further response is required.

With regard to filming, it appears that the commenter is considering commercial *video* shoots, rather than the commercial, *still* filming shoots that are requested under the proposed project, as a continuation of the approved uses in the 1980 land use agreement and associated 1980 EIR. All parking and noise impacts would occur on site, and would not reach off-site sources, as identified by the Draft SEIR. No further response is required.

ALP2-3 The commenter states that there is no logical reason to undertake or consider a Supplemental Environmental Review, stating that the 1980 EIR remains “valid and compelling”. Further, the commenter suggests that the analysis provided Draft SEIR is biased and goes on to suggest that a legal flaw exists because the Draft SEIR does not compare the impacts of the 1980 EIR to the impacts of the proposed project and concludes that the Recirculated SEIR cannot ignore the original (1980) EIR. These comments were provided by the same commenter on the Draft SEIR. As such, please refer to Responses ALP-3, ALP-4, and ALP-5 in the “Responses to Comments on the Draft Supplemental EIR” section of this document.

ALP2-4 The commenter states that Virginia Robinson Gardens should remain closed on Saturdays, suggesting that the City of Beverly Hills precludes business uses in residential areas on Saturdays, that education activities can occur Monday through Friday without impairment, and that there is no justification for the Gardens to be open on holidays. As discussed in Response ALP-1, the proposed project would not result in the Virginia Robinson Gardens acting as a commercial endeavor, as characterized by the commenter. The remaining portions of the comment are not direct comments on the content or adequacy of the Recirculated Final 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.

ALP2-5 The commenter questions why the operating hours cannot be 11:00 AM to 4:00 PM or alternatively retained at the current schedule. As set out on Draft SEIR p. 8, 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 p. 9, 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. This is not a direct comment on the content or adequacy of the Recirculated Final 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.

ALP2-6 The commenter questions why the number of patrons cannot be limited to 100 at a specific time, rather than 100 as a daily limit, suggesting that 100 patrons could

constitute a wedding. As discussed on Draft SEIR p. 10, the change to the number of patrons would not change the number of visitors daily but would provide greater flexibility in meeting the goal of the Virginia Robinson Gardens to provide programming that meets public interests while simultaneously meeting the goal of greater site accessibility. The intention is not to substantially change the uses allowed during these daytime hours (such as the suggested wedding), rather to provide for greater flexibility in the types of classes and tours that could be held at the Gardens. Visitation to the Gardens would still require advanced reservations and parking on-site so 100 people at a single time would not occur. This is not a direct comment on the content or adequacy of the Recirculated Final 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.

ALP2-7

The commenter questions why the types of events allowed could not continue under the status quo, suggesting that the discretion of the Superintendent to determine appropriate events at the Gardens represents a bias contrary to the balanced interest. Finally, the commenter questions why weddings and catered affairs cannot be precluded. As shown in Table 1 (Comparison of Existing and Proposed Operations) on Draft SEIR p. 4, the types of themes proposed during special events under the proposed project are all consistent with the goals of the Virginia Robinson Gardens to increase public access and expand the themes of biology, botany and horticulture. It is also worth noting 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, as discussed in Response ALP-3 of the Responses to Comment on the Draft SEIR section of this document, the County is requesting a discretionary action—an amendment to the existing operating agreement between the County and Friends of Virginia Robinson Gardens. All comments will be provided to decision-makers prior to consideration of the proposed project. This is not a direct comment on the content or adequacy of the Recirculated Final 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.

ALP2-8

The commenter questions why commercial filming events cannot be held consistent with the City of Beverly Hill ordinances, noting that the City restricts such activities. Contrary to the suggestion of the commenter, commercial filming at Virginia Robinson Gardens would be consistent with the City of Beverly Hills ordinances. Further, as noted in Response ALP2-2, above, with regard to filming, it appears that the commenter is considering commercial *video* shoots, rather than the commercial, *still* filming shoots that are requested under the proposed project, which is a continuation of the approved uses in the 1980 land use agreement and associated 1980 EIR. This is not a direct comment on the content or adequacy of the Recirculated Final 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.

- ALP2-9 The commenter questions why Virginia Robinson Gardens (and presumably the Friends of Robinson Gardens) could not host their fundraisers off-site at a hotel, 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 Recirculated Final 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.
- ALP2-10 The commenter states that a financial analysis of the monies that could be raised during the special uses/events was not included in the document, suggesting that the additional events could result in an increase in costs and a decrease in revenue/profits. A profit/loss analysis is not a requirement of CEQA and is at the discretion of the event holder, in this case, the Virginia Robinson Gardens. This is a direct comment on the legally required content or adequacy of the Recirculated Final 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.
- ALP2-11 The commenter questions why all parking cannot be provided off-site with transport to the project site, indicating that Greystone [Mansion and] Park operates that way for “large events” or at (presumably, the Beverly Hills) Hotel. Regarding daily parking, as discussed beginning on Recirculated Final SEIR p. 20, an analysis of the potential use of five local off-site parking alternatives was prepared. This analysis included Greystone Mansion and Park, the Beverly Hills Women’s Club, City of Beverly Hills parking structures (two) and use of the Cove Way parking area (albeit on-site) and concluded that uses of these off-site parking opportunities was not feasible for a variety of reasons, further explained in Appendix G of the Recirculated Final SEIR. Regarding parking for special events, as discussed throughout the Draft SEIR and specifically on p. 119, these would occur during non-peak hours and would be serviced by valet parking, as is the usual in the neighborhood and throughout Beverly Hills. The commenter does not state specifically why they would like parking off-site and as such it is difficult to address any related issues at this time. No further response is required.
- ALP2-12 The commenter questions why a restriction on walk-up patrons cannot be continued noting that it is unrealistic that patrons will take a bus and that taxis generate air emissions equivalent to “cars”. Arguably, it is reasonable to suggest that an elderly person would utilize the City of Beverly Hills free ride (for disabled residents) to arrive at the Virginia Robinson Gardens. Additionally, by way of survey of previous patrons, it is not uncommon for visitors and members of the Friends of Robinson Gardens who live in the neighborhood to want to walk to the Gardens (although they have previously been restricted). Street parking along Elden Way would continue to be restricted for patrons of the Gardens, with the addition of posted signs, which would ensure that an air quality impact along Elden Way or at the entrance to the Gardens would be less

than significant. Finally, while the commenter may opine on the choice of transport modes for others, allowing for flexibility to accommodate a wide-range of patrons is not unreasonable. No further response is required.

ALP2-13

This comment is generally conclusory in nature. The commenter states that they support the Gardens but not with the proposed changes, that the Recirculated Final EIR has fatal flaws, and that the County should support the findings and mitigation of the 1980 EIR. Regarding the first portion, this is strictly an opinion of the commenter and does not raise a specific environmental issue. Regarding the second and third portions of the comment regarding the 1980 EIR and the Recirculated Final SEIR, see Response ALP2-3. This is a specific comment on the content or adequacy of the Recirculated Final 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.

Harvey Alpert (ALP3), 6/23/2014

	<p>ALP3</p> <p>From: Harvey Alpert [mailto:halpert@haco.us.com] Sent: Monday, June 23, 2014 9:00 AM To: Joan Rupert Subject: Virginia Robinson Gardens</p> <p>Dear Ms Rupert: Almost 20 years ago I was introduced to the Virginia Robinson Gardens (VRG). Over that period I have come to appreciate the work that the VRG staff and volunteers do to maintain the 100+ year legacy of both the home and the gardens. Whenever I visit, I have a look into a slice of life in Los Angeles as it went from being a small town to a world class city.</p> <p>I know that the children and others that visit VRG are amazed at this jewel in the middle of our urban community. There are a very limited number of events at VRG, and there is always a shortage of funds available to complete the many tasks that are necessary to keep the property safe and vibrant.</p> <p>I hope that the County will find a way to allow VRG to host more tours and events so that the community will be able to have the same fine experience that I have been privileged to have these past many years.</p> <p>Sincerely, Harvey Alpert</p> <p>Please note my new email address halpert@haco.us.com</p>
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Responses to Harvey Alpert (ALP3), 6/23/2014

ALP3-1

This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Jeanne Anderson (AND), 6/17/2014

	<p>From: Jeanne Anderson [mailto:greenabutlon@gmail.com] Sent: Tuesday, June 17, 2014 3:32 PM To: Joan Rupert Subject: Robinson Gardens</p>	AND
AND-1	<p>Please make it possible for more of our community to enjoy this jewel of a garden and historic home I am a docent and past President of the Friends of Robinson Gardens and am constantly being asked why we are not open on Saturdays so children and people who work can visit I want to share what Virginia gave us As I once heard at a county meeting for Parks and Rec that we are "the County's little Hearst Castle</p> <p>-- Jeanne Anderson</p>	

Responses to Jeanne Anderson (AND), 6/17/2014

AND-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Suzanne Baird (BAI), 6/29/2014

	<p>From: Suzanne Baird [mailto:suzanne_baird@sbcglobal.net] Sent: Sunday, June 29, 2014 12:24 PM To: Joan Rupert Subject: Virginia Robinson Gardens</p>	BAI
BAI-1	<p>Dear Ms. Rupert,</p> <p>I've had the pleasure to visit the Virginal Robinson Gardens on a few occasions thru various garden groups and have found it to be both beautiful and educational. I would hope this garden could be made more accessible to the general public and strongly support the proposed operational changes, particularly providing additional project trips on Saturdays when most of the general public can take the time to make such a visit.</p> <p>Thank you. Suzanne Baird 32479 Fastwater Ct. Westlake Village, CA</p>	

Responses to Suzanne Baird (BAI), 6/29/2014

BAI-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the

content or adequacy of the Recirculated Final 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.

Cindy Baker (BAK), 7/11/2014

	<p>From: Cindy Baker [mailto:cb@box1922.com] Sent: Friday, July 11, 2014 11:58 AM To: Joan Rupert Subject: Virginia Robinson Garden</p>	BAK
BAK-1	<p>Dear Joan Rupert,</p> <p>As a frequent visitor to Virginia Robinson Gardens, I strongly support the proposed operation changes to Virginia Robinson Gardens. In particular, the additional project trips on Saturdays.</p> <p>Sincerely,</p> <p>Cindy Baker 4501 El Mirlo Rancho Santa Fe CA 92067</p>	

Responses to Cindy Baker (BAK), 7/11/2014

BAK-1 This comment provides introductory information regarding the commenter and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Bernice Balson (BAL), 6/27/2014

	<p>From: Bernice [mailto:bkbalsn@hotmail.com] Sent: Friday, June 27, 2014 5:18 PM To: Joan Rupert Subject: Historic home (reach out to the community)</p>	BAL
BAL-1	<p>Having been a member of Virginia Robinson Garden from the time someone was kind enough to share this hidden treasure with me.</p> <p>I too, would like to share and support the attendance of individuals and groups to enjoy this gem of an historic landmark and the history it has to offer to others.</p> <p>Please support the passing in your agenda to move onward and open Virginia Robinson garden on weekends.</p> <p>Kindly, Bernice Balson</p> <p>Sent from my iPad</p>	

Responses to Bernice Balson (BAL), 6/27/2014

BAL-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the

content or adequacy of the Recirculated Final 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.

Terry Bass (BAS), 2014/07/11

	<p>From: Terry Bass [mailto:tabass@socal.rr.com] Sent: Friday, July 11, 2014 12:49 PM To: Joan Rupert Subject: More Saturday Visits to Robinson Gardens</p>	BAS
BAS-1	<p>■ Although I have lived in the LA area since 1972 I only recently made my first visit to Robinson, and what a gem it is. I support allowing more people to come on Saturdays. Only retirees and out of town visitors ■ can make visits on weekdays.</p>	
	<p>Terry Bass 3007 Carolwood Torrance 90505</p>	

Responses to Terry Bass (BAS), 2014/07/11

BAS-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Barbara Bennett (BEN1), 7/4/2014

BEN1

From: BabsBennett@aol.com [<mailto:BabsBennett@aol.com>]
Sent: Friday, July 04, 2014 7:19 PM
To: Joan Rupert
Subject: Dear Ms.Joan Rupert

■ I was so happy to be able to attend the Robinson Home with my son in April...I had wanted to for years but because of working I was unable to attend till this April.

I think it is a wonderful idea to open the Home for more people by having more transportation being permitted to attend to bring more people in on Saturdays or as needed.

BEN1-1 The day I was there there were very few, maybe it was a group of six at one time and I had to wait weeks for an opening to attend and it was well worth the wait. I'm sure more would want to attend and would with this new system.

My son and I had a wonderful time there in that beautiful environment and the people in charge where so warm, friendly and kind...AND PAM WAS AN UNBELIEVEABLY SPECIAL LADY. What a pleasure it was to meet her.

■ Sincerely,

Barbara Ashton Bennett
212 Euclid Avenue, Apt. 217
Long Beach, Ca. 90803
562-243-3806

Responses to Barbara Bennett (BEN1), 7/4/2014

BEN1-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Carolyn Bennett (BEN2), 7/4/2014

	<p>From: Carolyn Bennett [mailto:carolyndbennett@gmail.com] Sent: Friday, July 04, 2014 6:07 AM To: Joan Rupert Subject: VRG</p>	BEN2
BEN2-1	<p>I firmly believe the Virginia Robinson Gardens should be open additional days to allow more visitors to learn from and enjoy its incredible history and beauty.</p> <p>Carolyn Bennett Board Member California Garden and Landscape History Society</p>	
	<p>-- Carolyn D. Bennett 323.632.9200 carolyndbennett@gmail.com</p>	

Responses to Carolyn Bennett (BEN2), 7/4/2014

BEN2-1 This comment is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

David and Susan Bewley (BEW), 6/29/2014

	<p>From: David Bewley [mailto:davidbewley@comcast.net] Sent: Sunday, June 29, 2014 11:04 AM To: Joan Rupert Subject: Proposal to allow additional Saturday Trips to Robinson Gardens</p>	BEW
BEW-1	<p>Dear Joan Rupert,</p> <p>As a part time resident San Gabriel and a visitor to The Virginia Robinson Gardens, I strongly support the proposed operational changes to The Virginia Robinson Gardens. In particular, the additional project trips on Saturdays. This will allow my family as well as others, an opportunity to tour the house and gardens or even attend special educational events focused on decorative arts, gardening as well as the colorful history of Southern California particularly the influence of the Robinson family. I do not believe that there will be a significant operational impact along Elden Way or the surrounding intersections and this will allow citizens who otherwise are unable, an opportunity to appreciate this historic landmark, all it has to offer and understand its value to Southern California and particularly Los Angeles County.</p> <p>Sincerely, David Bewley Susan Bewley 8502 E. Ravendale Road, San Gabriel, CA 91775</p>	

Responses to David and Susan Bewley (BEW), 6/29/2014

BEW-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Keith Biever (BIE), 6/27/2014

From: Biever Keith [<mailto:biever36@comcast.net>]
Sent: Friday, June 27, 2014 7:47 PM
To: Joan Rupert
Subject: Virginia Robinson Gardens

BIE

Joan,

BIE-1 | My grandmother was a Dryden and I am a cousin of Virginia (Dryden) Robinson. We live in Seattle and after learning of the Gardens in 2012 we have already visited twice. More people need to see these wonderful gardens and learn the history of how our amazing cousin and her husband created the Gardens. Please count my wife and I as strong supporters of allowing more project trips on Saturdays.

Most sincerely,

Keith Biever
521 5th Ave W, #404
Seattle, WA 98119
206-283-9047

Responses to Keith Biever (BIE), 6/27/2014

BIE-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Lisa Bittan (BIT), 6/13/2014

From: lisa bittan [<mailto:lisabittan@gmail.com>]
Sent: Friday, June 13, 2014 10:11 PM
To: Joan Rupert
Subject:

BIT

BIT-1 | Hope you let more people enjoy more time at Robinson Gardens!
Best, Lisa Bittan

Responses to Lisa Bittan (BIT), 6/13/2014

BIT-1 This comment is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Mary Bosak (BOS), 6/22/2014

	<p>From: betsbosak@aol.com [mailto:betsbosak@aol.com] Sent: Sunday, June 22, 2014 9:44 AM To: Joan Rupert Subject: Virginia Robinson Garden</p>	BOS
BOS-1	<p>I am writing to highly recommend that the Virginia Robinson gardens be permitted to expand their public hours to include Saturdays, most holidays, as well as two additional special events each year.</p> <p>This historic estate and its magical six acre gardens have been a hidden jewel for many years. The expansion of open days, hours and number of events will allow the entire property to be more fully utilized, in accordance with Virginia Robinson's wishes.</p> <p>Adoption of this motion by the Los Angeles County Board of Supervisors will allow greater opportunity for public access by the citizens of Los Angeles County to enjoy the House Museum, exceptional gardens and colorful history of the first family of Beverly Hills.</p> <p>I hope you will support this request.</p> <p>Mary Bosak 1000 Villa Grove Pacific Palisades, CA 90272</p>	

Responses to Mary Bosak (BOS), 6/22/2014

BOS-1 This comment is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Emily Boyle (BOY), 6/16/2014

	<p>From: ERBOYLE@aol.com [mailto:ERBOYLE@aol.com] Sent: Monday, June 16, 2014 5:56 PM To: Joan Rupert Subject: Virginia Robinson Gardens</p> <p>Dear Ms. Rupert:</p> <p>I have been attending events at the Virginia Robinson Gardens since about the third year of the garden tour. (Around 20 years?) I have also attended numerous lectures in the pool house and several of the evening Galas.</p> <p>Over the years, these events have grown exponentially in attendance, but have never lost the focus, flavor and quality of those small original gatherings.</p> <p>The groups who plan and oversee events at the property are all aware of the potential impact on the neighborhood and have always ensured that, whatever the event, traffic flow and being a good neighbor are of paramount importance.</p> <p>I would love to see additional use being made of this magnificent property so that the community at large can benefit from more access.</p> <p>In a time where education is suffering throughout the state, and "Mc Mansions" and multi family housing developments are filling up our open spaces as our population grows larger and larger every year, it seems more and more important to have a place where people can learn to value and respect landscape, nature, growing produce, learn about horticulture, learn about the importance of historic and architectural preservation and or even just escape the chaos and density in the city.</p> <p>Places like the Robinson Gardens are jewels that should be treasured and protected for generations to come. If additional events will help with the funding of their preservation efforts and at the same time create more access for the community to enjoy the benefits, it seems like a "win" for all and should be supported!</p> <p>Feel free to contact me should you have any questions.</p> <p>Sincerely, Emily Boyle</p> <p>Emily R Boyle Law Offices of Jonathan W. Biddle One Wilshire Boulevard, Suite 2200 Los Angeles, California 90017 (213) 629-8720 (213) 629-8722 fax</p>	BOY
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BOY-1

Responses to Emily Boyle (BOY), 6/16/2014

BOY-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Susan Brauneiss (BRA), 6/30/2014

	<p>From: stbofini@aol.com [mailto:stbofini@aol.com] Sent: Monday, June 30, 2014 4:28 PM To: Joan Rupert; Stbofini@aol.com Subject: Robinson Gardens Operational Changes</p> <p>June 30, 2014</p> <p>Dear Ms. Rupert,</p> <p>I am a member of the Friends of Robinson Gardens and I strongly support the proposed operational changes, including the additional project trips on Saturdays. More residents of Los Angeles County should benefit from Mrs. Robinson's generous gift to the public. The additional round-trips on Saturdays will allow access to the gardens to families who work during the week. They will be able to tour the house and gardens or to attend one of VRG's special educational events, focused on gardening, the decorative arts and the colorful history of Southern California.</p> <p>The historical and environmental educational opportunities at VRG, a property owned by the County of Los Angeles, should be available to members of working families and the proposed operational changes will achieve this goal without imposing on nearby residents in Beverly Hills.</p> <p>Sincerely, Susan Brauneiss 555 North Bristol Avenue Los Angeles, CA 90049</p>	<p>BRA</p>
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Responses to Susan Brauneiss (BRA), 6/30/2014

BRA-1 This comment is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Ellisa Bregman (BRE1), 6/16/2014

BRE1

From: elanbre@aol.com [mailto:elanbre@aol.com]
Sent: Monday, June 16, 2014 11:11 AM
To: Joan Rupert
Subject: Virginia Robinson Gardens EIR Report

Dear Ms. Rupert,

I have been going to the Virginia Robinson Gardens for many years. I always bring many friends from both in and out of town to visit this beautiful historical site. I also attend the very informative and educational lectures and their annual fund raising events to support this most unique property in the heart of Beverly Hills.

BRE1-1 With additional days open to the public it will give many more adults and children the opportunity to experience this magical home and garden and to be educated about maintaining and preserving our environment.

Please consider allowing more days for the public to come and enjoy The Virginia Robinson Gardens.

Sincerely,
Ellisa Bregman

Responses to Ellisa Bregman (BRE1), 6/16/2014

BRE1-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.


Grace Breuer (BRE2), 6/27/2014

BRE2

June 27, 2014

Dear Joan Rupert,

BRE2-1 As a resident of Santa Monica and a frequent visitor to The Virginia Robinson Gardens, I strongly support the proposed operational changes to The Virginia Robinson Gardens. In particular, the additional project trips on Saturdays.

Sincerely,

Grace Breuer
2643 Centinela Ave. #8
Santa Monica, CA 90405

Responses to Grace Breuer (BRE2), 6/27/2014

BRE2-1 This comment provides introductory information regarding the commenter and is in support of the proposed project. As this comment is not a direct comment on the

content or adequacy of the Recirculated Final 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.

Marcy Brubaker (BRU), 6/13/2014

	<p>From: Marcy Kelly [mailto:marcykelly1@gmail.com] Sent: Friday, June 13, 2014 4:10 PM To: Joan Rupert Subject: Support of Robinson Gardens Access</p>	BRU
BRU-1	<p>I am writing in support of the motion to allow expanded days and times for the public to visit Robinson Gardens in Beverly Hills. It's a lovely preservation of old Los Angeles and should be more accessible.</p> <p>Marcy Kelly Brubaker 607 N Sierra Drive Beverly Hills, CA 90210</p>	

Responses to Marcy Brubaker (BRU), 6/13/2014

BRU-1 This comment is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Evelyn Carlson (CAR), 6/16/2014

	<p>From: Evelyn Carlson [mailto:ecarlson9571@gmail.com] Sent: Monday, June 16, 2014 10:51 AM To: Joan Rupert Subject: Expansion of Hours at Robinson Gardens</p>	CAR
CAR-1	<p>Robinson Gardens is a significantly underutilized asset owned by the County of Los Angeles. Due to the restrictive EIRs governing the estate, Robinson Gardens can only be visited by a few select groups of people, mostly retired, who have time during the week. This excludes most people and children. While a small group of Beverly Hills homeowners may want to keep the current restrictive EIRs, I suspect that if the county's tax-paying population became aware that their access to beautiful gardens and an historic estate were being restricted by a few rich people, they would be outraged.</p> <p>I realize the County has to balance the viewpoints and interest of all of its citizens. This has to be a very tricky proposition. Nonetheless, Virginia Robinson left her estate to the County of Los Angeles for the public's enjoyment. Robinson Gardens offers the public an oasis of beauty and peace in an urban environment. The estate and its owners, Virginia and Harry Robinson, played a significant role in the history and development of Beverly Hills and southern California. The public should know about that role. The proposed new EIRs would give many more people access to the estate and allow for the expansion of the children and adult educational programs.</p> <p>I believe the new EIRs would greatly benefit the community. I urge that the new EIRs be approved.</p> <p>Sincerely, Evelyn Carlson</p>	

Responses to Evelyn Carlson (CAR), 6/16/2014

CAR-1 This comment is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Ann Christie (CHR), 7/7/2014

	<p>From: Ann petersen [mailto:leslyann@pacbell.net] Sent: Monday, July 07, 2014 1:22 PM To: Joan Rupert Subject: Virginia Robinson Gardens</p>	CHR
	<p>Dear Joan Rupert,</p>	
CHR-1	<p>I am a resident of Los Angeles and have enjoyed on many occasions a visit to Virginia Robinson Gardens but I am retired and am able to visit during the weekdays. I strongly support the proposed operational changes to the Virginia Robinson Gardens that allow visitors on Saturdays. It is such a shame that more people aren't able to visit this crown jewel in the County's botanical gardens. I hope that the changes will be made to allow more people to enjoy something so beautiful.</p>	
	<p>Sincerely,</p> <p>Ann Christie 9185 Thrasher Avenue Los Angeles, CA 90069</p>	

Responses to Ann Christie (CHR), 7/7/2014

CHR-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Angela Cohan (COH1), 6/28/2014

	<p>From: Angela Cohan [mailto:cohan8@sbcglobal.net] Sent: Saturday, June 28, 2014 5:16 PM To: Joan Rupert Subject: Virginia Robinson Garden</p>	COH1
	<p>June 28, 2014</p> <p>Dear Joan Rupert,</p>	
COH1-1	<p>As a resident of Beverly Hills and a frequent visitor to The Virginia Robinson Gardens, I strongly support the proposed operational changes to The Virginia Robinson Gardens in particular, the additional project trips on Saturdays.</p>	
	<p>Sincerely,</p> <p>Angela Cohan 1704 Lexington Rd Beverly Hills, CA 90210</p>	

Responses to Angela Cohan (COH1), 6/28/2014

COH1-1 This comment provides introductory information regarding the commenter and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Ben Cohan (COH2), 6/29/2014

	<p>From: B Cohan [mailto:cohan860@sbcglobal.net] Sent: Sunday, June 29, 2014 10:15 AM To: Joan Rupert Cc: Tim Lindsay Subject: Re: Support letter for Saturday programs at Virginia Robinson Gardens</p>	COH2
	<p>June 29, 2014</p> <p>Dear Joan Rupert,</p>	
COH2-1	<p>As a resident of Beverly Hills and a frequent visitor to The Virginia Robinson Gardens, I strongly support the proposed operational changes to The Virginia Robinson Gardens. In particular, the additional project trips on Saturdays.</p>	
	<p>Sincerely, Ben Cohan 1704 Lexington Rd Beverly Hills, CA 90210</p>	

Responses to Ben Cohan (COH2), 6/29/2014

COH2-1 This comment provides introductory information regarding the commenter and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Susan Cohen (COH3), 7/3/2014

	<p>July 3, 2014</p> <p>Ms. Joan Rupert, Section Head Los Angeles County Department of Parks and Recreation 510 South Vermont Ave. Los Angeles, CA 90020-1975</p> <p>Dear Ms. Rupert,</p> <p>As a long-time and frequent visitor to The Virginia Robinson Gardens, I strongly support the proposed operational changes to The Virginia Robinson Gardens. In particular, the additional project trips on Saturdays.</p> <p>Sincerely,</p> <p>Susan Lindsey Cohen 2940 Mandeville Canyon Road Los Angeles, CA 90049</p>	<p>COH3</p>
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Responses to Susan Cohen (COH3), 7/3/2014

COH3-1 This comment provides introductory information regarding the commenter and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Pamela Collingwood (COL), 7/8/2014

	<p>From: Pamela Collingwood [mailto:pamelacollingwood@gmail.com] Sent: Tuesday, July 08, 2014 10:14 AM To: Joan Rupert Subject: Virginia Robinson Gardens</p>	COL
	<p>Dear Ms. Rupert,</p>	
COL-1	<p>As a resident of Culver City and a frequent visitor to Virginia Robinson Gardens, I strongly support the proposed operational changes to Virginia Robinson Gardens—in particular, the additional project trips on Saturdays.</p>	
	<p>Sincerely,</p>	
	<p>Pamela Collingwood 4134 Le Bourget Ave Culver City, CA 90232</p>	

Responses to Pamela Collingwood (COL), 7/8/2014

COL-1 This comment provides introductory information regarding the commenter and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Cynthia Comsky (COM1), 6/27/2014

	<p>From: CYNTHIA COMSKY [mailto:cyncom@mac.com] Sent: Friday, June 27, 2014 3:38 PM To: Joan Rupert Subject: The Virginia Robinson Gardens</p>	COM1
	<p>June 27, 2014</p>	
	<p>Dear Joan Rupert,</p>	
COM1-1	<p>As a resident of Beverly Hills and a frequent visitor and neighbor to The Virginia Robinson Gardens, I strongly support the proposed operational changes to The Virginia Robinson Gardens. In particular, the additional project trips on Saturdays.</p>	
	<p>Sincerely, Cynthia Comsky 1027 Cove Way Beverly Hills, CA 90210</p>	

Responses to Cynthia Comsky (COM1), 6/27/2014

COM1-1 This comment provides introductory information regarding the commenter and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Neil and Ruth Cuadra (CUA), 7/10/2014

CUA

From: cuadra@ca.rr.com [<mailto:cuadra@ca.rr.com>]
Sent: Thursday, July 10, 2014 9:18 AM
To: Joan Rupert
Subject: Proposed Operational Changes to the Virginia Robinson Gardens

July 10, 2014

Los Angeles County Department of Parks and Recreation
510 South Vermont Avenue, Room 201
Los Angeles, CA 90020
Attention: Joan Rupert, Section Head, Environmental and Regulatory Permitting

Ms. Rubert,

CUA-1 ■ As Los Angeles City residents, homeowners, and frequent museum-goers, we have a strong interest in seeing the right balance set between museum availability and local community concerns. After reading the details of the Recirculated Supplemental Environmental Impact Report on the Proposed Operational Changes to the Virginia Robinson Gardens (http://file.lacounty.gov/dpr/cms1_214694.pdf) we have concluded that the proposed operational changes are an overall benefit to the residents of both Los Angeles and Beverly Hills.

We strongly support the proposed changes, including the additional availability on Saturdays, changes to the limits on visitors and events, and especially the ability of visitors to arrive on public sidewalks after taking public transportation.

Please count us among those who favor the Proposed Operational Changes to the Virginia Robinson Gardens.

■

Thank you.

Neil and Ruth Cuadra
3171 Purdue Avenue
Los Angeles, CA 90066
cuadra@ca.rr.com

Responses to Neil and Ruth Cuadra (CUA), 7/10/2014

CUA-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Art Curtis (CUR), 7/5/2014

CUR-1	<p>From: art curtis [mailto:garden.art@earthlink.net] Sent: Saturday, July 05, 2014 12:43 PM To: Joan Rupert Subject: Saturday access</p>	CUR
	<p>July 5, 2014</p>	
	<p>Dear Joan Rupert,</p>	
	<p>As a resident of Downtown Los Angeles and a visitor to The Virginia Robinson Gardens, I strongly support the proposed operational changes for the additional hours on Saturdays. My first visit to the Gardens made me realize what a hidden gem this estate is and even though it may be known by locals on the Westside, it is a gift to the city and should be enjoyed on an expanded visiting schedule for others to discover on the weekend.</p>	
	<p>I am chairman of a National Historic District in downtown Los Angeles and a landscape designer. I enjoy the beauty of historic gardens that I have visited worldwide and only recently discovered at my doorstep this treasure. I encourage your office to expand the hours of operation to Saturdays so that others can enjoy this world class garden.</p>	
	<p>Sincerely,</p>	
	<p>Art Curtis Architectural, Landscape & Garden Art Historic North University Park 2647 Magnolia Ave. Los Angeles, CA 90007-2302</p>	
	<p>Studio 213-747-1355 Mobile 213-284-1983 www.artcurtisgardenart.com</p>	
	<p>Member of The National Garden Conservancy, The Cultural Landscape Foundation, The Institute of Classical Architecture & Art, Land8 Lounge, LinkedIn Houzz.com- Best of Houzz Award 2014 Chairman of The North University Park National Historic District Design Review Board</p>	

Responses to Art Curtis (CUR), 7/5/2014

- CUR-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Paige Doumani (DOU), 7/10/2014

	<p>From: Paige Doumani [mailto:siena659@hotmail.com] Sent: Thursday, July 10, 2014 12:39 PM To: Joan Rupert Subject: Virginia Robinson Gardens</p>	DOU
	<p>Dear Ms. Rupert,</p>	
DOU-1	<p>I am so excited to hear that there is a possibility of the expansion of public hours and open days to include Saturdays and most holidays. I have come to LOVE this magical, interesting and extraordinarily beautiful garden. This would be such a blessing for me personally since I always try to share this iconic jewel in Los Angeles, with visitors from either out of state or abroad, all of whom have also fallen in love with it. This was absolutely the wishes and dream of this most generous and civic minded woman, Virginia Robinson, who poured her heart and soul into a property that continues to be cherished by those lucky enough to be the current custodians.</p> <p>I speak not only for myself, but also for the 106 Bel Air Garden Club members for whom this has been a source of learning and joy, all of whom consider this one of the most wonderful treasures our city has to offer.</p>	
	<p>Many thanks for your kind consideration. Respectfully Paige Doumani (310)472-8155</p>	

Responses to Paige Doumani (DOU), 7/10/2014

DOU-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Diana Doyle (DOY1), 6/13/2014

	<p>From: dpdoyle123@aol.com [mailto:dpdoyle123@aol.com] Sent: Friday, June 13, 2014 4:35 PM To: Joan Rupert Subject: Virginia Robinson Gardens</p>	DOY1
DOY1-1	<p>The house and the property are such a treasure available to the public at large. I'd like to state that the expansion of house and additional events would be of great benefit to the public and allow more people to benefit from this amazing resource.</p> <p>Diana Doyle (310) 271-4920</p>	

Responses to Diana Doyle (DOY1), 6/13/2014

DOY1-1 This comment is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Diana Doyle (DOY2), 6/13/2014

DOY2-1	<p style="text-align: right;">DOY2</p> <p>From: dpdoyle123@aol.com [mailto:dpdoyle123@aol.com] Sent: Friday, June 13, 2014 4:35 PM To: Joan Rupert Subject: Virginia Robinson Gardens</p> <p>The house and the property are such a treasure available to the public at large. I'd like to state that the expansion of house and additional events would be of great benefit to the public and allow more people to benefit from this amazing resource.</p> <p>Diana Doyle (310) 271-4920</p>
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Responses to Diana Doyle (DOY2), 6/13/2014

DOY2-1 This comment is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Regina Drucker (DRU), 6/13/2014

DRU-1	<p style="text-align: right;">DRU</p> <p>From: Regina [mailto:reginadrucker@sbcglobal.net] Sent: Friday, June 13, 2014 4:52 PM To: Joan Rupert Subject: Virginia Robinson gardens</p> <p>Please open/extend the days/hours for this Jewel in the Crown of Los Angeles to shimmer amongst those who seek a bit of serenity in this bustling city. We have the Ennis house, Greystone, Barnsdall and yet, Mrs. Robinson's garden and home is more important for like Hearst Castle, it is fully furnished. Presenting a time capsule when Golden Hollywood of yesteryear lived and wandered thru the rooms and gardens so replete with specimen plantings.</p> <p>Unlike Lotusland, this is our MARBLEHOUSE as in Newport, Rhode Island.</p> <p>I've restored and lived in many homes here in Los Angeles as a native born. From Wallace Neff to Frank Lloyd wright...I know a DREAM when I see one!</p> <p>Please help us!</p> <p>Regina Drucker</p> <p>Mistakes by iPad</p>
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Responses to Regina Drucker (DRU), 6/13/2014

DRU-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Mary Estrin (EST), 7/3/2014

	<p>From: Mary Lloyd Estrin [mailto:marylestrin@gmail.com] Sent: Thursday, July 03, 2014 4:42 PM To: Joan Rupert Subject: To Whom It May concern:</p>	EST
EST-1	<p>Please keep the Robinson gardens open longer hours, and more days, so the public can take advantage of this treasure in Los Angeles.</p> <p>Thank you</p> <p>Mary Estrin</p>	

Responses to Mary Estrin (EST), 7/3/2014

EST-1 This comment is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Krista Everage (EVE1), 6/13/2014

	<p>From: Krista Everage [mailto:kristaeverage@gmail.com] Sent: Friday, June 13, 2014 10:36 PM To: Joan Rupert Subject: Virginia Robinson Gardens</p>	EVE1
EVE1-1	<p>Hello!</p> <p>I have been involved with fundraising and preserving the beautiful Virginia Robinson Gardens since 1989. It has been a labor of love!</p> <p>This most precious of resources is so important to preserve, as it is a relic of our collective history. So many women work tirelessly to raise the funds needed. If hours were expanded, more people could experience the history and the important gardens, enriching lives.</p> <p>Also it would allow more fund raising opportunities, which the gardens surely needs. It has fallen on the backs of a few to maintain these gardens, which may become a problem as the age of the members takes it's toll .</p> <p>I urge the expansion of both public hours and event allowances .</p> <p>Many thanks!</p> <p>Krista</p> <p>Krista Everage, ASID Everage Design, Inc. EverageDesign.com Krista@EverageDesign.com (o) 310.264.0066 ext 205 Sent from my mobile device.</p>	

Responses to Krista Everage (EVE1), 6/13/2014

EVE1-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Krista Everage (EVE2), 6/28/2014

EVE2-1	<p style="text-align: right;">EVE2</p> <p>From: Krista Everage [mailto:kristaeverage@gmail.com] Sent: Saturday, June 28, 2014 6:28 PM To: Joan Rupert Cc: Friends of Robinson Gardens Subject: Robinson gardens</p> <p>Dear Ms Rupert,</p> <p>I am writing to lend my support of expanding hours to include Saturday at the virginia Robinson gardens. I have worked as a Friend of Robinson Gardens since 1990 to help preserve and restore this valuable piece of Los Angeles history. It should be available to enjoy by all, including Saturday as a visiting day. Many people work Monday thro Friday, so it's important to have the Gardens open in Saturdays.</p> <p>Many thanks for your attention to this suggestion!</p> <p>Krista Everage, ASID Everage Design, Inc. EverageDesign.com Krista@EverageDesign.com (o) 310.264.0066 ext 205</p> <p>1025 24 th street Santa Monica ca 90403</p>
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Responses to Krista Everage (EVE2), 6/28/2014

EVE2-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Lynda Fadel (FAD), 7/1/2014

	<p>From: Lynda Fadel [mailto:lafadel@roadrunner.com] Sent: Tuesday, July 01, 2014 10:17 AM To: Joan Rupert Subject:</p>	FAD
	<p>July 1, 2014</p> <p>Dear Joan Rupert,</p>	
FAD-1	<p>As a resident of Beverly Hills, a close neighbor, and a frequent visitor to The Virginia Robinson Gardens, I strongly support the proposed operational changes to The Virginia Robinson Gardens. In particular, the additional project trips on Saturdays.</p>	
	<p>Sincerely,</p> <p>Lynda Wolfson Fadel 1018 Summit Drive Beverly Hills, California 90210</p>	

Responses to Lynda Fadel (FAD), 7/1/2014

FAD-1 This comment provides introductory information regarding the commenter and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.


Cynthia Fields (FIE1), 6/28/2014

	<p>From: cindy fields [mailto:cf5150@hotmail.com] Sent: Saturday, June 28, 2014 2:14 PM To: Joan Rupert Subject: Virginia Robinson Gardens</p>	FIE1
	<p>Dear Ms. Rupert,</p>	
FIE1-1	<p>I am writing to ask for support in expanding the visitor use of the Gardens to include additional project trips on Saturdays. As a long time committed volunteer at the Robinson Gardens I feel it is important that many more of our residents and visitors have the opportunity to visit this very special place. Our group (Friends of Robinson Gardens) works very hard to raise additional monies to support the County in maintaining this very special piece of Los Angeles history for all to experience.</p>	
	<p>Saturday expansion will allow many to enjoy this little piece of paradise.</p> <p>Thank you ,</p> <p>Cynthia Fields</p>	

Responses to Cynthia Fields (FIE1), 6/28/2014

FIE1-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Kara Fox (FOX1), 6/24/2014

FOX1-1	<div style="text-align: right; font-weight: bold; font-size: 1.2em;">FOX1</div> <p>From: Kara Fox [mailto:lunifox@aol.com] Sent: Tuesday, June 24, 2014 7:16 AM To: Joan Rupert Subject: from one who appreciates robinson gardens</p> <p>ms. rupert, i write for two reasons:</p> <p>the first is to say thank you for your support of the robinson gardens.</p> <p>the second is to ask that you recognize the importance of this beautiful space that offers so much to the community. in a busy life, with people occupied in so many ways, it is significantly important to be able to stroll in the quiet, smell the flowers, and enjoy the beauty. this is what robinson gardens offers the community and it would be such an added gift if more members of our community and guests from outside of los angeles, could have the opportunity to enjoy this magnificent space by allowing additional use of this property. this would add so much to the city of los angeles.</p> <p>with consideration, of course, to those who live by, an increase in the opportunities to visit can only do good for so many.</p> <p>thank you in advance for your consideration.</p> <p>respectfully, kara fox </p> <hr style="width: 20%; margin-left: 0;"/> <p>Glamourproject.org Newworldreview.com karasbest.com karafox@me.com</p>
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Responses to Kara Fox (FOX1), 6/24/2014

FOX1-1 This comment is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Kara Fox (FOX2), 6/27/2014

FOX2

From: Kara Fox [<mailto:LUNIFOX@aol.com>]
Sent: Friday, June 27, 2014 7:47 AM
To: Joan Rupert
Subject: from one who appreciates robinson gardens

ms. rupert,
i write for two reasons:

the first is to say thank you for your support of the robinson gardens.

the second is to ask that you recognize the importance of this beautiful space that offers so much to the community. in a busy life, with people occupied in so many ways, it is significantly important to be able to stroll in the quiet, smell the flowers, and enjoy the beauty. this is what robinson gardens offers the community and it would be such an added gift if more members of our community and guests from outside of los angeles, could have the opportunity to enjoy this magnificent space. additional use of this property can add so much to los angel

with consideration, of course, to those who live by, an increase in the opportunities to visit can only do good for so many.

thank you in advance for your consideration.

respectfully, kara fox
kARAFOX

Glamourproject.org
Newworldreview.com
karasbest.com
karafox@me.com

FOX2-1

Responses to Kara Fox (FOX2), 6/27/2014

FOX2-1 This comment is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Teri Fox-Stayner (FOX3), 6/13/2014

FOX3

From: Teri Fox-Stayner [<mailto:foxystory@aol.com>]
Sent: Friday, June 13, 2014 4:42 PM
To: Joan Rupert
Subject: Virginia Robinson Gardens

Supervisors:

Please expand the days and hours for Mrs. Robinson's wonderful gift to the citizens of Los Angeles County and to our international visitors.

Teri Fox-Stayner
Children's Docent
(over 16 years)

FOX3-1

Responses to Teri Fox-Stayner (FOX3), 6/13/2014

FOX3-1 This comment is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Suzanne Freedman (FRE), 6/14/2014

<p>From: Suzanne Freedman [mailto:suzannefreedman@verizon.net] Sent: Saturday, June 14, 2014 9:17 AM To: Joan Rupert Subject: Virginia Robinson Gardens</p> <p>FRE-1 The expansion of visiting days and times is a wonderful idea.</p>	<p>FRE</p>
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Responses to Suzanne Freedman (FRE), 6/14/2014

FRE-1 This comment is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Ellen Friedmann (FRI1), 7/3/2014

<p>From: Ellen Friedmann [mailto:ellenfriedmann@gmail.com] Sent: Thursday, July 03, 2014 2:13 PM To: Joan Rupert Subject: Virginia Robinson Gardens</p> <p style="text-align: center;">July 3, 2014</p> <p>Dear Ms. Rupert:</p> <p>FRI1-1 As a resident of Los Angeles and a frequent visitor to Virginia Robinson Gardens, I strongly support the proposed operational changes to Virginia Robinson Gardens, in particular, the additional project trips on Saturdays that would allow visitors who work during the week to visit the beautiful gardens.</p> <p> Sincerely,</p> <p> Ellen T. Friedmann 17221 Avenida de la Herradura Pacific Palisades CA 90272</p> <p> -- Smile more; life is short!</p> <p>ETF</p>	<p>FRI1</p>
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Responses to Ellen Friedmann (FRI1), 7/3/2014

FRI1-1 This comment provides introductory information regarding the commenter and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Ann Garber-Rimoin (GAR), 6/27/2014


	<p>June 27, 2014</p> <p>Dear Joan Rupert,</p> <p>As a resident (your city) and a frequent visitor to The Virginia Robinson Gardens, I strongly support the proposed operational changes to The Virginia Robinson Gardens. In particular, the additional project trips on Saturdays.</p> <p>Sincerely, Ann Garber-Rimoin 627 North Alta Dr. Beverly Hills, CA 90210</p>	<p>GAR</p>
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GAR-1

Responses to Ann Garber-Rimoin (GAR), 6/27/2014

GAR-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Betty Goldstein (GOL), 6/27/2014

	<i>BGR</i>	GOL
	<i>June 27, 2014</i>	
	<i>Dear Joan Rupert,</i>	
GOL-1		<p><i>As a resident Los Angeles and a frequent visitor to The Virginia Robinson Gardens, I strongly support the proposed operational changes to The Virginia Robinson Gardens. In particular, the additional project trips on Saturdays. I believe having the garden more available will be beneficial to the community.</i></p>
	<i>Sincerely,</i>	
	<i>Betty Rodríguez Goldstein</i>	

Responses to Betty Goldstein (GOL), 6/27/2014

GOL-1 This comment provides introductory information regarding the commenter and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Maggi Gordon (GOR), 6/27/2014

GOR

From: Margaret Gordon [<mailto:MAGGI@MAGGIGORDON.COM>]
Sent: Friday, June 27, 2014 6:54 PM
To: Joan Rupert
Subject: Virginia Robinson Gardens

June 27, 2014

Dear Joan Rupert,

GOR-1 | ■ As a resident of Sierra Madre and an avid supporter of The Virginia Robinson Gardens, I strongly support the proposed operational changes to The Virginia Robinson Gardens. In particular, I would like to see the addition of project trips on Saturdays to allow those who cannot visit the site during the working week the chance to experience this wonderful County-owned facility.

■

Sincerely,

Maggi Gordon

maggi@maggigordon.com

Responses to Maggi Gordon (GOR), 6/27/2014

GOR-1 This comment provides introductory information regarding the commenter and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Joann Gottlieb (GOT), 6/30/2014

GOT

From: Joann Gottlieb [<mailto:joanngottlieb@gmail.com>]
Sent: Monday, June 30, 2014 9:15 AM
To: Joan Rupert
Subject: Robinson garden

GOT-1 | ■ I am in favor of opening the gardens more frequently especially on Saturdays.
Joann Gottlieb

■ Sent from my iPhone

Responses to Joann Gottlieb (GOT), 6/30/2014

GOT-1 This comment is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Sandra Harris (HAR), 7/4/2014

	<p>From: Sandy Harris [mailto:skh@webtechla.com] Sent: Friday, July 04, 2014 8:05 AM To: Joan Rupert Subject: Virginia Robinson Gardens</p>	HAR
HAR-1	<p>As someone who works full-time, it isn't possible to visit the Virginia Robinson Gardens during the week. Having the gardens open on Saturday makes it possible to enjoy them.</p>	
	<p>Sandra Harris</p>	

Responses to Sandra Harris (HAR), 7/4/2014

HAR-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Paula Henson (HEN), 6/27/2014

	<p>From: Paula Henson [mailto:terrabelalandscape@gmail.com] Sent: Friday, June 27, 2014 4:33 PM To: Joan Rupert Subject: Robinson Gardens Saturday project trips</p>	HEN
	<p>Dear Joan Rupert,</p>	
HEN-1	<p>As a resident Los Angeles and a frequent visitor to The Virginia Robinson Gardens, I strongly support the proposed operational changes to The Virginia Robinson Gardens. In particular, the additional project trips on Saturdays.</p>	
	<p>Sincerely,</p> <p>Paula Henson</p> <p>12660 Palms Bl.</p> <p>Los Angeles, CA 90066</p>	

Responses to Paula Henson (HEN), 6/27/2014

HEN-1 This comment provides introductory information regarding the commenter and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Laura Herrmann (HER1), 7/10/2014

HER1

From: Laura Herrmann [<mailto:seastitcher@hotmail.com>]
Sent: Thursday, July 10, 2014 7:38 PM
To: Joan Rupert
Subject:

Dear Joan Rupert,

HER1-1 | **As a resident Los Angeles and a frequent visitor to Virginia Robinson Gardens, I strongly support the proposed operational changes to Virginia Robinson Gardens. In particular, the additional project trips on Saturdays.**

Sincerely,
Laura Herrmann
1323 Silvius Ave.
San Pedro, CA 90731

Responses to Laura Herrmann (HER1), 7/10/2014

HER1-1 This comment provides introductory information regarding the commenter and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Doris Herzog (HER2), 7/11/2014

HER2

From: Doris Herzog [<mailto:tortugasherzog@yahoo.com>]
Sent: Friday, July 11, 2014 3:53 PM
To: Joan Rupert
Subject: Robinson gardens

To Joan Rupert,

HER1-1 | I very much support the change to allow the additional project trips on Saturday to the Virginia Robinson Gardens. This gem should be available to the public and Saturday access is an important part of that.

Doris Herzog
4213 Paseo de las Tortugas
Torrance CA 90505

Sent from my iPad

Responses to Doris Herzog (HER2), 7/11/2014

HER2-1 This comment is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Chery Horacek (HOR1), 7/3/2014

	<p>From: Mrs. Horacek Chery [mailto:denslowfarms@hotmail.com] Sent: Thursday, July 03, 2014 11:05 AM To: Joan Rupert Subject: Robinson Garden</p>	HOR1
HOR1-1	<p>I support opening the garden to tours for school children. Thanks, Chery Horacek</p>	

Responses to Chery Horacek (HOR1), 7/3/2014

HOR1-1 This comment is in support of the proposed project changes as it relates to school children and, presumably, school groups. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Adrienne Horwitch (HOR2), 7/8/2014

	<p>From: Adrienne Horwitch [mailto:ashorwitch@aol.com] Sent: Tuesday, July 08, 2014 9:08 PM To: Joan Rupert Subject: Virginia Robinson Gardens</p>	HOR2
HOR2-1	<p>As a 31 year resident of the city of Beverly Hills, and new Co-President of the Friends of Robinson Gardens, I am writing to you to express my support for the changes proposed for Virginia Robinson Gardens. In particular I hope that we may finally be open on Saturdays so that all the people of Los Angeles will have a greater opportunity to enjoy this Landmark property. I want my grandchildren to be able to visit when they are not in school, and I want people who work during the week to have that opportunity as well. I have been involved with Robinson Gardens for many years and I am frustrated by the lack of accessibility for the public.</p> <p>Thank you so much.</p> <p>Adrienne Horwitch</p> <p>285 S. Spalding Drive Beverly Hills, CA 90212 310-553-1556</p>	

Responses to Adrienne Horwitch (HOR2), 7/8/2014

HOR2-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Jeff Hyland (HYL), 6/24/2014

HYL

From: Jeffrey Hyland [<mailto:jeff@jeffhyland.com>]
Sent: Tuesday, June 24, 2014 1:32 PM
To: Joan Rupert
Subject: Virginia Robinson Gardens

HYL-1 | I am requesting Saturday visitation for the Robinson Gardens. I am a resident of Beverly Hills and a supporter of its historic and legendary estates. The Robinson Gardens is one of the hidden jewels in our city and is so important to children to visit to understand the architectural significance as well as explore with docents the gardens. Many young children will long remember their visit to the Gardens and hopefully, this will inspire them to better appreciate our hidden Beverly Hills park for years to come.

Jeff Hyland
President
HILTON & HYLAND
Founding Member
CHRISTIE'S
INTERNATIONAL REAL ESTATE

250 North Cañon Drive
Beverly Hills, CA 90210
Office: (310) 278-3311

Responses to Jeff Hyland (HYL), 6/24/2014

HYL-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Donna Jett (JET), 6/13/2014

JET

From: Donna Jett [<mailto:jettcarmel@gmail.com>]
Sent: Friday, June 13, 2014 5:53 PM
To: Joan Rupert
Subject: Robinson Gardens

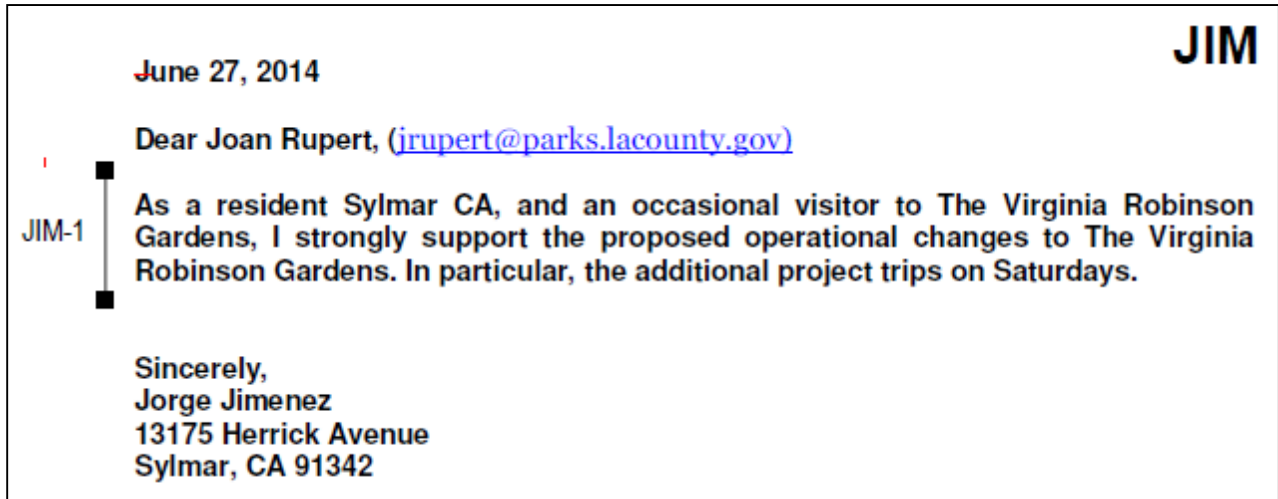
JET-1 | Please respond to their request for extended hours and days. This is a valuable under utilized gem and the public availability is paramount. Thanks and vote yes to assist Robinson Gardens in their important request. Thank you, Donna Jett

Sent from my iPad

Responses to Donna Jett (JET), 6/13/2014

JET-1 This comment is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

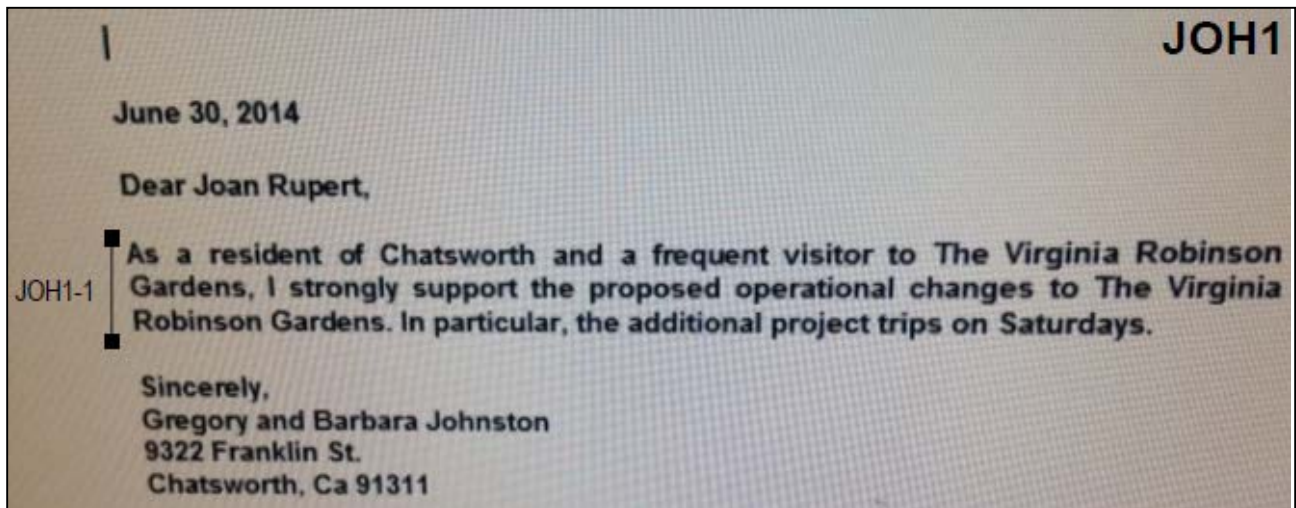
Jorge Jimenez (JIM), 6/27/2014



Responses to Jorge Jimenez (JIM), 6/27/2014

JIM-1 This comment provides introductory information regarding the commenter and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Gregory and Barbara Johnston (JOH1), 6/30/2014



Responses to Gregory and Barbara Johnston (JOH1), 6/30/2014

JOH1-1 This comment provides introductory information regarding the commenter and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Joshua Johnston (JOH2), 7/10/2014

July 10, 2014 **JOH2**

Dear Joan Rupert,

JOH2-1 ■ As a horticultural enthusiast and the on site care taker of The Virginia Robinson Gardens, I strongly support the proposed operational changes to The Virginia Robinson Gardens. In particular, the additional project trips on Saturdays.

Sincerely,

Joshua Johnston
1008 Elden Way
Beverly Hills, CA 90210

Responses to Joshua Johnston (JOH2), 7/10/2014

JOH2-1 This comment provides introductory information regarding the commenter and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Dorothy Kamins (KAM1), 6/14/2014

From: Dorothy Kamins [<mailto:dorothy@pkdkamins.com>]
Sent: Saturday, June 14, 2014 2:18 PM
To: Joan Rupert
Subject: Robinson Gardens **KAM1**

Dear Ms. Joan Rupert:

KAM1-1 ■ Please take into consideration of the expansion of time to allow 2 additional events to take place at the Robinson Gardens as well as the advantage of having the citizens of the city be able to enjoy the beautiful 6 acres of gardens and walk through a lovely home that was the center of early social life, with visitors from all over the world.

■ This would be a grand endeavor that would benefit the community and the citizens of Los Angeles County.

Regards,

Dorothy Kamins, Robinson Gardens Member

Responses to Dorothy Kamins (KAM1), 6/14/2014

KAM1-1 This comment is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Jackie Kassorla (KAS), 6/28/2014

	<p>From: Alfred Hahnfeldt [mailto:fhla1946@gmail.com] Sent: Saturday, June 28, 2014 3:09 PM To: Joan Rupert Subject: Re: Operational Changes to the Virginia Robinson Gardens</p>	KAS
KAS-1	<p>Dear Ms. Rupert,</p> <p>As a resident of Beverly Hills and a frequent visitor to The Virginia Robinson Gardens, I strongly support the proposed operational changes to The Virginia Robinson Gardens. In particular, the additional project trips on Saturdays.</p> <p>Sincerely,</p> <p>Jackie Kassorla</p> <p>471 S. Peck Dr.</p> <p>Beverly Hills, CA 90212</p>	

Responses to Jackie Kassorla (KAS), 6/28/2014

KAS-1 This comment provides introductory information regarding the commenter and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Suzanne Kayne (KAY), 6/27/2014

	<p>From: Suzanne Kayne [mailto:suzanne@suzannekayne.com] Sent: Friday, June 27, 2014 6:11 PM To: Joan Rupert Subject: Support for The Virginia Robinson Gardens</p>	KAY
KAY-1	<p>Dear Joan Rupert,</p> <p>As a resident of Santa Monica City and a frequent visitor to The Virginia Robinson Gardens, I strongly support the proposed operational changes to The Virginia Robinson Gardens. In particular, the additional project trips on Saturdays.</p> <p>Sincerely,</p> <p><i>Suzanne Kayne</i> 801 Woodacres Road Santa Monica, CA 90402</p>	

Responses to Suzanne Kayne (KAY), 6/27/2014

KAY-1 This comment provides introductory information regarding the commenter and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Lauren King (KIN), 7/3/2014

	From: Lauren King [mailto:Lauren@laurenking.com]	KIN
	Sent: Thursday, July 03, 2014 9:53 PM	
	To: Joan Rupert	
	Subject: Opening Robinson Gardens	
KIN-1	■ It would be great for the public and tourism in particular if the gardens were open more. ■ Thanks, Lauren King	
	Sent from my iPad	

Responses to Lauren King (KIN), 7/3/2014

KIN-1 This comment is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

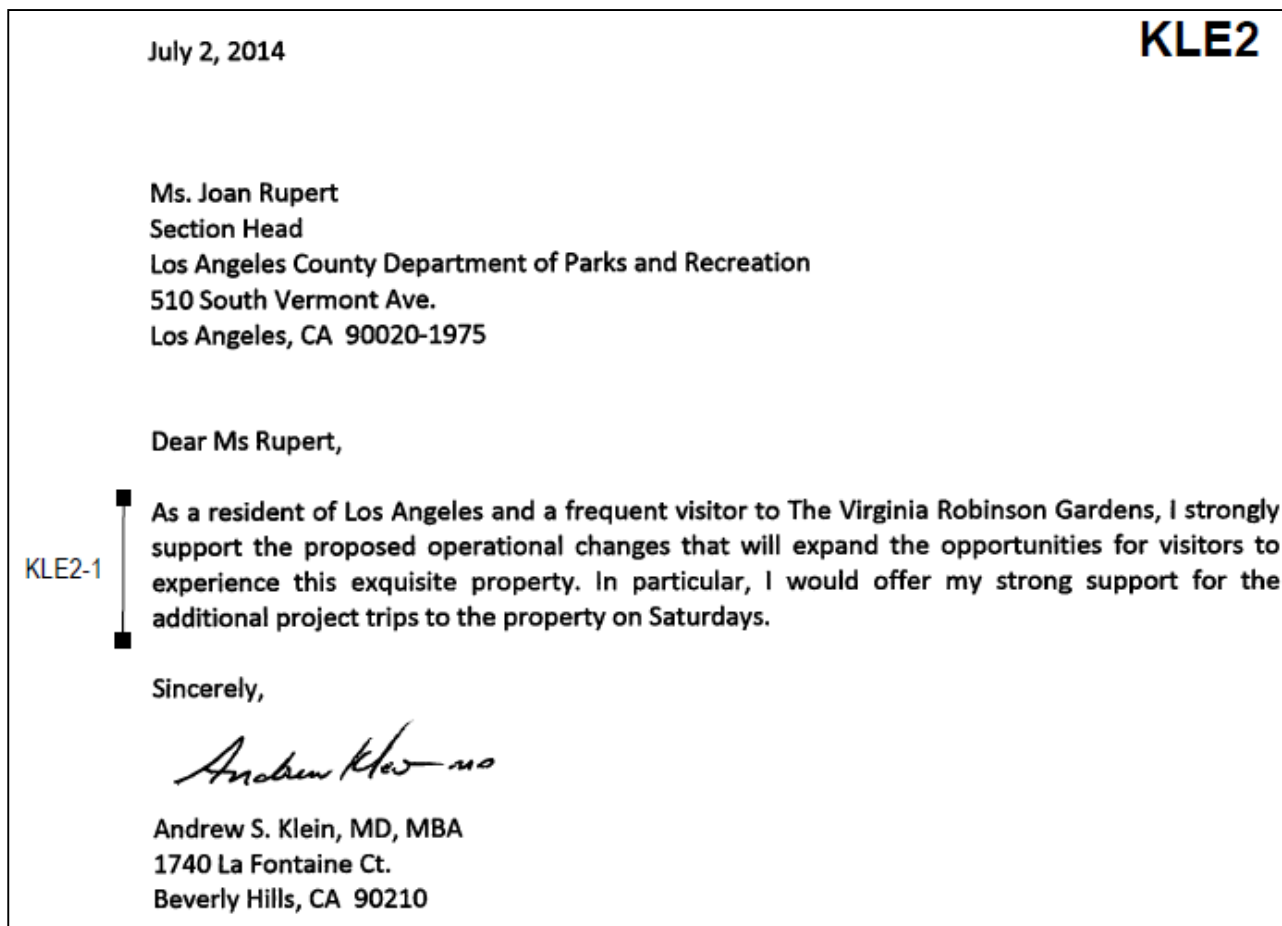
Julia Klein (KLE1), 6/16/2014

	<p>From: Julia Klein [mailto:klein1954@gmail.com] Sent: Monday, June 16, 2014 8:36 AM To: Joan Rupert Subject: Virginia Robinson Gardens of Beverly Hills -Public Comment</p>	KLE1
	<p>Dear Joan,</p> <p>I moved to Los Angeles 10 years ago. I was fortunate to be introduced to Robinson Gardens, a hidden gem in Beverly Hills. Over the years, I've grown to love the property. The history, the home, the gardens, the pool... I knew I was hooked when I finally referred to Robinson Gardens as "OUR" beautiful property. The energy is evident. What an honor it is to be a part of the atmosphere of the glorious historical days in Beverly Hills, when there was very little around the area but bean fields. Today, the property is filled with beautiful mature trees, plants, and the spectacular Palm Garden! As I said, it's magical!</p>	
KLE1-1	<p>For all of those reasons, this unique property needs to be shared and loved by a larger audience. Children and their families should have the opportunity to stroll around the Gardens on a Saturday and walk through the Palm Garden in the cool shelter of the majestic trees. They should hear the stories about Mrs. Robinson's monkeys, the blue birds she cared for, the turtles she loved, and the Hollywood celebrities who came to play tennis. This history should be shared with visitors who may otherwise never have the opportunity to take a step back in time for a few hours.</p> <p>Virginia Robinson left her estate to Los Angeles County for others to enjoy. Please allow this legacy to live on! Greater exposure with increased hours of operation will generate the funds required to preserve this historical estate. Without this change I am greatly concerned that the maintenance of this stunning property is not sustainable.</p>	
	<p>Respectfully submitted,</p> <p>Julia Klein</p>	

Responses to Julia Klein (KLE1), 6/16/2014

KLE1-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Andrew Klein (KLE2), 7/2/2014



Responses to Andrew Klein (KLE2), 7/2/2014

KLE2-1 This comment provides introductory information regarding the commenter and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Carole Kramer (KRA), 7/10/2014

<p>From: Carole Kramer [mailto:carolekramer@verizon.net] Sent: Thursday, July 10, 2014 9:52 PM To: Joan Rupert Subject: Virginia Robinson Gardens Saturday access</p> <p>July 11, 2014</p> <p>Dear Joan Rupert, (jrupert@parks.lacounty.gov)</p> <p>As a resident of Pacific Palisades and a frequent visitor to Virginia Robinson Gardens, I strongly support the proposed operational changes to Virginia Robinson Gardens. In particular, the additional project trips on Saturdays.</p> <p>Sincerely,</p> <p>Carole Kramer, 511 Radcliffe Ave., Pacific Palisades, CA 90272</p>	<p>KRA</p>
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Responses to Carole Kramer (KRA), 7/10/2014

KRA-1 This comment provides introductory information regarding the commenter and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Suz Landay (LAN1), 7/14/2014

	<p>From: Suz Landay [mailto:swldesign@aol.com] Sent: Monday, July 14, 2014 1:04 PM To: Joan Rupert Subject: The Virginia Robinson Gardens</p>	LAN1
LAN1-1	<p>The Virginia Robinson Gardens and Estate is a great treasure in the history of our city. It encompasses a time capsule of the early 20th century lifestyle of the rich. It is a step into the lifestyle of one couple who lived on the property from it's completion until their deaths.</p>	
	<p>It has been carefully preserved and is enjoyed by visitors. Sadly those are only the people who can come during the day 3 days a week. It is not for those who are only able to come on the weekend or evenings.</p>	
	<p>It is very difficult to raise the funds necessary to maintain the personal items of the Robinsons when we are so restricted in open hours. There is adequate parking and seven acres which greatly reduce the possibility of our visitors causing any disturbance to the neighbors.</p>	
	<p>I have been a docent at the gardens for many years. I see how much pleasure the gardens bring to our guests. This is a very pleasant history lesson and a most beautiful mature garden. There are very few properties like this- only lived in by the original owners with their personal items displayed. The rich details of their entertaining and</p>	

Responses to Suz Landay (LAN1), 7/14/2014

LAN1-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Lynda Levy (LEV1), 7/9/2014

	<p>From: Lynda Levy MFT [mailto:lyndadoestherapy@ca.rr.com] Sent: Wednesday, July 09, 2014 2:21 PM To: Joan Rupert Subject: Virginia Robinson Gardens</p>	LEV1
	<p>Dear Joan</p>	
LEV1-1	<p>As a resident of Los Angeles married to a former resident of Beverly Hills and a frequent visitor to Virginia Robinson Gardens, I strongly support the proposed operational changes to Virginia Robinson Gardens. In particular, the additional project trips on Saturdays.</p>	
	<p>Sincerely,</p> <p>Lynda Levy</p> <p>10281 Cresta Drive</p> <p>Los Angeles, CA 90064</p>	
	<p><i>Lynda A. Levy, MFT</i> Marriage Family Therapist Lic 43458 Credentialed with Magellan/Blue Shield,Cigna, HealthNET, MHN et al</p>	
	<p>www.lyndaalevy-MFT.com 310-207-9829 11110 Ohio Avenue #202 @ Sepulveda, LA 90025 Individuals, Couples, Families & Groups; Parenting Support, Cancer Recovery Support & Grief Counseling Member affiliations: Past President, Los Angeles chapter, California Assoc. Marriage Family Therapists (LA-CAMFT); Los Angeles County Psychological Association (LACPA); Cancer Support Community/Benjamin Center formerly The Wellness Community; Red Cross Mental Health Volunteer; Friends of the Semel Institute (NPI/UCLA)</p>	
	<p><small>NOTICE TO RECIPIENT: If you are not the intended recipient of this e-mail, you are prohibited from sharing, copying, or otherwise using or disclosing its contents. If you have received this e-mail in error, please notify the sender immediately by reply e-mail and permanently delete this e-mail and any attachments without reading, forwarding or saving them. Thank you.</small></p>	

Responses to Lynda Levy (LEV1), 7/9/2014

LEV1-1 This comment provides introductory information regarding the commenter and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Lynne Lertzman (LER), 7/7/2014

From: Lynne Lertzman [<mailto:satwhiz@aol.com>] **LER**
Sent: Monday, July 07, 2014 8:49 PM
To: Joan Rupert
Subject: Comments per your email request

■ We think it is a great idea to open up the weekend to give access to those who are not available during the week.

LER-1 ■ We have yet another suggestion: The ladies of our Synagogue (Temple Ramat Zion in Northridge) would more than love to visit and take a tour but we are restricted and cannot partake on Saturdays. Since you are encouraging suggestions, we were wondering if you would consider offering a tour perhaps one Sunday a month. We'd love to visit but feel frustrated because you offer nothing on Sundays. Looking forward to your response

■ Thanks for allowing us to be honest & voice our sincere thoughts.

Best,
Lynne
Ways& Means VP
[Satwhiz@ aol.com](mailto:Satwhiz@aol.com)

Sent from my iPad

Responses to Lynne Lertzman (LER), 7/7/2014

LER-1 This comment is in support of the proposed project. The comment goes on to further request the offering of tours one Sunday a month due to religious restrictions on Saturdays. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Alfredo Llamedo (LLA), 6/30/2014

From: Alfredo Llamedo-Sierra [<mailto:alfredo@atelierkf.com>] **LLA**
Sent: Monday, June 30, 2014 1:20 PM
To: Joan Rupert
Subject: The Virginia Robinson Gardens

June 27, 2014

Dear Joan Rupert, (jrupert@parks.lacounty.gov)

LLA-1 ■ As a resident of Santa Ana and a frequent visitor to The Virginia Robinson Gardens, I strongly support the proposed operational changes to The Virginia Robinson Gardens. In particular, the additional project trips on Saturdays.

■ Sincerely,

Alfredo Llamedo
11412 Arroyo Avenue
Santa Ana, CA 92705

Responses to Alfredo Llamedo (LLA), 6/30/2014

LLA-1 This comment provides introductory information regarding the commenter and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Diana Lombardi (LOM), 7/10/2014

	<p>From: R91087 [mailto:r91087@aol.com] Sent: Thursday, July 10, 2014 8:32 PM To: Joan Rupert Subject: Virginia Robinson Gardens</p> <p style="text-align: right;">LOM</p> <p>Dear Ms Rupert,</p> <p>I recently had the great pleasure of visiting the Virginia Robinson Gardens for the first time. What a delight! I think it would be wonderful if more people were allowed to see this state treasure, and strongly support Saturday visits.</p> <p>I would recommend one thing, however. It should be noted in the advertisement for this locale that the tour is strenuous. It might be a good idea to make certain there is staff available to assist visitors with handicaps so they may share in the tour. The only way to do this properly is to ask about special needs on a reservation request form. Other than that, for those of us who were able to keep up with our docent, the tour was marvelous! Keep up the good work!</p> <p>Sincerely,</p> <p>Diana Lombardi</p>
--	---

Responses to Diana Lombardi (LOM), 7/10/2014

LOM-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Kathleen Luckard (LUC1), 6/13/2014

<p>From: Kathleen Luckard [mailto:kathleen.luckard@gmail.com] Sent: Friday, June 13, 2014 2:05 PM To: Joan Rupert Subject: Support for the proposed operational changes to the Virginia Robinson Gardens</p>	<p>LUC1</p>
<p>June 13, 2014</p>	
<p>Dear Ms Rupert,</p>	
<p>I enthusiastically support the proposed operational changes to the Virginia Robinson Gardens.</p>	
<p>I moved to Los Angeles nearly 4 years ago and discovered Virginia Robinson Gardens (VRG) first as a visitor, then as a docent/volunteer. There are not many places in all of Southern California that offer such beauty and history to visitors.</p>	
<p>The architecturally significant estate is over 100 years old, older than Greystone or Hearst Castle. This period spans an important time in Los Angeles history – when Harry Robinson arrived in Los Angeles (1882), the population was about 11,500; when Virginia Robinson died (1977), the population was nearing 3 million.</p>	
<p>LUC1-1</p>	<p>The 6+ acres of surrounding gardens, lovingly created by Virginia over 66 years, exhibit global themes – Italian, citrus, palm, kitchen garden, rose displays. This is truly an American garden – drawing from the best ideas in the world. Indeed, preserving her gardens was Virginia’s main reason for deeding the property to Los Angeles County – she knew the County had an arboretum.</p>
<p><i>The purpose of the 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. (VRG Mission Statement.)</i></p>	
<p>Anything that can be done to more fully utilize the estate for the education and enjoyment of the general public is something every member of the Los Angeles County Board of Supervisors should support unreservedly.</p>	
<p>Sincerely, Kathleen Luckard 659 South Cloverdale Avenue Apartment 212 Los Angeles, California 90036 Phone: 323-272-3353</p>	

Responses to Kathleen Luckard (LUC1), 6/13/2014

LUC1-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Kathleen Luckard (LUC2), 6/27/2014

	<p>From: Kathleen Luckard [mailto:kathleen.luckard@gmail.com] Sent: Friday, June 27, 2014 5:10 PM To: Joan Rupert Subject: Support for Virginia Robinson Gardens</p>	LUC2
	<p>June 27, 2014</p> <p>Dear Ms. Rupert,</p>	
LUC2-1	<p>As a resident of Los Angeles and a frequent visitor to Virginia Robinson Gardens, I strongly support the proposed operational changes to Virginia Robinson Gardens; in particular, the additional project trips on Saturdays.</p>	
	<p>Sincerely,</p> <p>Kathleen Luckard</p> <p>659 South Cloverdale Avenue</p> <p>Apartment 212</p> <p>Los Angeles, CA 90036</p>	

Responses to Kathleen Luckard (LUC2), 6/27/2014

LUC2-1 This comment provides introductory information regarding the commenter and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

James Luckard (LUC3), 7/3/2014

	<p>July 3, 2014</p> <p>Dear Joan Rupert, (jrupert@parks.lacounty.gov)</p>	LUC3
LUC3-1	<p>As a resident of Los Angeles and a frequent visitor to The Virginia Robinson Gardens, I strongly support the proposed operational changes to The Virginia Robinson Gardens. In particular, the additional project trips on Saturdays.</p>	
	<p>Sincerely,</p> <p>James Luckard</p> <p>659 South Cloverdale Ave</p> <p>#201</p> <p>Los Angeles, CA</p> <p>90036</p>	

Responses to James Luckard (LUC3), 7/3/2014

LUC3-1 This comment provides introductory information regarding the commenter and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Linda McKendry (MCK), 7/3/2014

MCK

From: Linda Mckendry [<mailto:linda@lindamckendry.com>]
Sent: Thursday, July 03, 2014 9:28 AM
To: Joan Rupert
Subject: Robinson gardens

MCK-1 | Please help keep Robinson gardens open on Saturdays!
|
| Robinson gardens is an Los Angeles gem that deserves to be seen and used by more folks
|
| Weekend hours would greatly improve that chance!
|
| Best
|
| Linda McKwndry
|
| Sent from my iPhone

Responses to Linda McKendry (MCK), 7/3/2014

MCK-1 This comment is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

David Merino (MER), 6/27/2014

	<p>From: David Merino [mailto:davidamerino@yahoo.com] Sent: Friday, June 27, 2014 9:57 PM To: Joan Rupert Subject: The Virginia Robinson Gardens - Beverly Hills - Saturday Activities</p>	MER
	<p>Dear Joan,</p> <p>■ As an active member of the Los Angeles and Beverly Hills community for many years, I have had the first-hand opportunity to witness how access to arts, beauty and culture can have an inspiring and transforming effect on people's lives.</p> <p>After the Los Angeles riots, I worked with Rebuild LA to create a skills training program for street youth in areas disrupted by civil unrest. We also created a template of cultural exposure activities for the participants. This program created the ability for mentors to bring groups of kids from less-fortunate areas of the county to experience LACMA, MOCA, the Huntington Gardens, Griffith Observatory and other cultural area landmarks, and to see things that perhaps they had not previously had the chance to be exposed to. I can tell you that even a brief exposure to art, beauty and culture had an awakening effect on the minds of these impressionable kids. It was evident that such enrichment helped them to break through any existing textural disadvantages, allowing them to consider beauty, to think more expansively, and to imagine greater possibilities in their lives.</p> <p>I support any programs at the venerable Virginia Robinson Gardens that would allow further interaction and facilitate access by members of the public. While I agree that the Virginia Robinson Gardens is a small and precious jewel, it is true that no jewel is more beautiful and brilliant than when it is taken out its box to be appreciated by others. To share beauty is an inspiring thing. Please encourage and facilitate increased access by members of the public to the coordinating programs on Saturdays at the Gardens.</p> <p>■ Thank you for your kind consideration.</p> <p>Very best regards,</p> <p>David Merino P.O. Box 18457 Beverly Hills, California 90209</p>	
MER-1		

Responses to David Merino (MER), 6/27/2014

MER-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Nancy Miller (MIL1), 6/19/2014

	<p>From: Nancy Miller [mailto:craftyscott@aol.com] Sent: Thursday, June 19, 2014 5:38 PM To: Joan Rupert Subject: Virginia Robinson Gardens</p>	MIL1
	<p>Dear Ms. Rupert,</p>	
MIL1-1	<p>Virginia Robinson Gardens should not be a hidden treasure. Saturday hours are essential to allow a greater part of our community the opportunity to appreciate its beauty. With the increasing density of our city, the County has a duty to make this remarkable historic property accessible to individuals and families of all ages. I urge you to endorse this LONG OVERDUE change in the Robinson Gardens' hours of operation.</p>	
	<p>Thank you for helping to make this happen, Nancy Miller 1930 Purdue Avenue #7 - Los Angeles, CA 90025 310.472.5051</p>	

Responses to Nancy Miller (MIL1), 6/19/2014

MIL1-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Laura Morton (MOR1), 7/3/2014


MOR1

From: Laura Morton [<mailto:lm@lauramortondesign.com>]
Sent: Thursday, July 03, 2014 9:21 AM
To: Joan Rupert
Subject: Yes Robinson Gardens

MOR1-1 ■ The robinson gardens is such a lovely spot it seems a shame that more people can't visit on saturday.....I would love a chance myself to go at my leisure with friends from out of town. I am in favor of the gardens being open more often.

■
thankyou

Laura Morton



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Responses to Laura Morton (MOR1), 7/3/2014

MOR1-1 This comment is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Lulah Paulos (PAU), 6/29/2014

From: Poppy Paulos [<mailto:mnkyshoe@aol.com>]
Sent: Sunday, June 29, 2014 12:54 PM
To: Joan Rupert
Subject: Saturday tours of Robinson Gardens

PAU

Dear Ms. Rupert,

PAU-1 I encourage you to support Saturday tours at the Virginia Robinson Gardens. As a longtime resident of Beverly Hills, I often have house guests visiting over weekends and am always disappointed that I am unable to show them this lovely local treasure in my own backyard.

Sincerely,

Lulah (Poppy) Paulos
805 N. Foothill Road
Beverly Hills, CA. 90210

Sent from my iPad

Responses to Lulah Paulos (PAU), 6/29/2014

PAU-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Ann Peterson (PET), 6/18/2014

From: Ann petersen [<mailto:leslyann@pacbell.net>]
Sent: Wednesday, June 18, 2014 10:10 AM
To: Joan Rupert
Subject: Robinson Garden

PET

Ms. Joan Rupert,

PET-1 I would like to voice my wish that Robinson Gardens be open to more of the public. It is such a jewel that is really so hidden from the public as so very few people even know of its existence. In my travels when I talk about it, I am always asked if it is open on Saturdays and I have to say no. Many people work during the week and are unable to visit during normal visiting hours. I feel so strongly that more people should be able to visit such an extraordinary place. Please consider the changes that are proposed. Thank you for your consideration.

Ann Petersen
310-275-7489

Responses to Ann Peterson (PET), 6/18/2014

PET-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Donald Philipp (PHI1), 7/5/2014

PHI1
July 5, 2014

Ms Joan Rupert, Section Head
 L.A. County Dept of Parks & Recreation
 510 S. Vermont Ave
 Los Angeles, CA 90020-1975

RE: Additional Round trips on Saturday to the Virginia Robinson Gardens on Elden Way, Beverly Hills

PHI1-1

As a 12-year docent at the Virginia Robinson Gardens, I enthusiastically endorse the County's position on the additional round trips on Elden Way which allows additional visitors to this historical site and will not create more negative impacts on adjacent streets and intersections.

Considering the amount of low-key "cultural" programming that the County residents are exposed to, it is indeed heartening that the County is in the forefront of providing its educational program of this historical jewel to the County's 10 million residents.

I feel I have a personal kinship to the Robinson and Dryden families as my maternal grandmother arrived in Los Angeles just a couple of years after their families moved into Hancock Park. In addition, my paternal grandparents settled in Los Angeles 20 years later and established a less expansive garden on their 2-acre home site near Brent-ly LAX.

Sincerely,
 Donald A. Philipp
 6348 Boney Ave
 Reseda, CA 91335
 818-345-8910

RECEIVED
 JUL 9 2014 4:09:10
 PLANNING DIVISION

Responses to Donald Philipp (PHI1), 7/5/2014

PHI1-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Nancy Power (POW), 7/3/2014

POW

From: Nancy Goslee Power [<mailto:nancy@nancypower.com>]
Sent: Thursday, July 03, 2014 11:29 AM
To: Joan Rupert
Cc: Jeanne Anderson
Subject: Robinson Gardens

Dear Ms. Rupert,

I would like the Robinson Garden to be open more. It is one of our great public gardens, one of two in Beverly Hills, and I think we should share with our friends, both our local and global visitors. As a source for educational purposes and small celebrations it is unrivaled in Beverly Hills.

As a professional garden designer I visit in order to study the incredible collection of palms, and to enjoy a link to a more gentler life.

Please do not hesitate to write or call me.
Sincerely yours,
Nancy Power



Nancy Goslee Power, RAAR '04
Nancy Goslee Power & Associates
1015 Pier Avenue
Santa Monica, CA 90405
310-264-0266 Business
310-496-3163 Fax
nancy@nancypower.com
www.nancypower.com

POW-1

Responses to Nancy Power (POW), 7/3/2014

POW-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Jon Puno (PUN), 6/27/2014

PUN

From: Jon Paul Puno [<mailto:jonpaulpuno@aol.com>]
Sent: Friday, June 27, 2014 8:03 PM
To: Joan Rupert
Subject: Virginia Robinson Gardens

Dear Joan Rupert,

PUN-1 | **As a resident of Beverly Hills and a frequent visitor to the Virginia Robinson Gardens, I strongly support the proposed operational changes to the Virginia Robinson Gardens. In particular, the additional project trips on Saturdays.**

Sincerely,

Jon Paul Puno
128 S Oakhurst Dr.
Beverly Hills, CA 90212

--
Jon Paul Puno

Get the latest news and tour dates.
JonPaulPuno.com
[Facebook](#)

Sent from my iPhone.

Responses to Jon Puno (PUN), 6/27/2014

PUN-1 This comment provides introductory information regarding the commenter and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Patricia Reinstein (REI), 6/14/2014

From: preinstein [<mailto:preinstein@me.com>]
Sent: Saturday, June 14, 2014 4:24 PM
To: Joan Rupert
Subject: Virginia Robinson Gardens

REI

Dear Ms. Rupert,

REI-1 ■ This note is to let you know how important it is to expand the hours and number of events that can be held at the beautiful and magical Robinson Gardens. It is a hidden jewel in the midst of Beverly Hills that could better be shared with the community if the hours were expanded. It was Mrs. Robinsons wish to share the estate with all who shared her love of history and gardening. Please help to fulfill her desire to let the Gardens be more open to those who need the expanded hours in order to view its magic.

Patricia Reinstein

Sent from my iPad

Responses to Patricia Reinstein (REI), 6/14/2014

REI-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Ben Reznik (REZ), 7/11/2014



Jeffer Mangels
Butler & Mitchell LLP

REZ

Benjamin M. Reznik
Direct: (310) 201-3572
Fax: (310) 712-8572
bmr@jmbm.com

1900 Avenue of the Stars, 7th Floor
Los Angeles, California 90067-4308
(310) 203-8080 (310) 203-0567 Fax
www.jmbm.com

July 11, 2014

VIA E-MAIL AND MAIL

County of Los Angeles
Department of Parks and Recreation
433 South Vermont Avenue, Room 201
Los Angeles, CA 90020
Attention: Joan Rupert, Section Head, Environmental and Regulatory Permitting
Email: jrupert@parks.lacounty.gov

Re: Comment to Recirculated Supplemental Environmental Impact Report
Virginia Robinson Gardens

Dear Ms. Rupert:

This comment letter responds to the Recirculated Supplemental Environmental Impact Report ("SEIR") for Virginia Robinson Gardens. As requested, this letter limits its comments to the significant and unavoidable impact in Transportation/Traffic.

REZ-1

Our firm represents a group of homeowners (the "Affected Residents") who live on Elden Way in the immediate vicinity of Virginia Robinson Gardens in the City of Beverly Hills (the "City"). We submitted a prior comment letter to the SEIR, dated August 16, 2012, identifying numerous concerns with the proposed expansion of operations at Virginia Robinson Gardens including significant impacts to traffic, noise and parking in this scenic residential neighborhood.

The Recirculated SEIR fails to address these issues, and instead concedes that the changes in operations do cause a significant traffic impact. In addition, the Recirculated SEIR fails to sufficiently identify the existing traffic status at this location.

1. **The Annual Events Cause Significant Traffic For A Month That Is Not Analyzed in the Recirculated SEIR.**

REZ-2

Virginia Robinson Gardens is currently permitted to host two (2) annual Special Use events on the property. Despite a prohibition against parking by Virginia Robinson Gardens visitors on Elden Way, the vendors, caterers and contractors for these events park and idle on Elden Way during set-up and take-down of every event. The set-up and take-down period lasts two weeks prior to and after each event. The trucks often idle in the middle of the street blocking the use of the street by neighbors from several minutes to hours. The neighbors are

Los Angeles County
 July 11, 2014
 Page 2

REZ-2
 cont.

provided no notice of this imposition, and Virginia Robinson Gardens does not limit the times and hours for vendor use. The truck fumes invade the neighboring properties and create considerable noise. If the County approves an increase in events from two to four, it will increase the traffic impact time to the neighbors from two months to four months. This cannot be considered a temporary or insignificant impact, since it would occur for four months each year.

The Recirculated SEIR fails to address the significant traffic impacts to the Elden Way neighbors caused by set up and take-down of the event, and the actual event traffic. The Recirculated SEIR also fails to evaluate the option to enter Virginia Robinson Gardens from other entrances, especially for vendor, caterer, and contractor use during events.

In order to partially mitigate some of the significant impacts caused by events, Virginia Robinson Gardens must restrict the use of Elden Way during Special Use events only to the extent absolutely necessary. All vendor set-up and take-down should occur on another larger street that does not have the same impact as this quiet narrow street. If drop off can occur only on Elden Way, no large trucks should be permitted. The duration of event set-up should be significantly limited to a day or two prior to the actual event. In addition, Virginia Robinson Gardens should have a single point of contact available at any time during the event, including set-up and take-down to address neighbor complaints of traffic impacts.

2. Virginia Robinson Gardens Fails to Restrict Parking on Elden Way and the Recirculated SEIR Fails to Evaluate the Traffic Impact of this Parking.

REZ-3

The Recirculated SEIR confirms that street parking is prohibited by visitors to Virginia Robinson Gardens, but fails to evaluate that these provisions are not being enforced. Both visitors and vendors park and idle on Elden Way during events and during weekday visits. This impermissibly limits the number of parking spaces available to residents and their guests. Vendors, caterers and contractors often block driveways and streets due to the large size of their vehicle. Any increase in Saturday hours will only increase this problem, and the Recirculated SEIR already identifies a significant traffic impact on Saturday. The County must strictly enforce the no-parking provisions, including for guests, staff, volunteers, Special Use event personnel, caterers, suppliers, contractors, and any taxi or shuttle drop off or pick up. This restriction must apply to any preparation for and entry to any Special Use event.

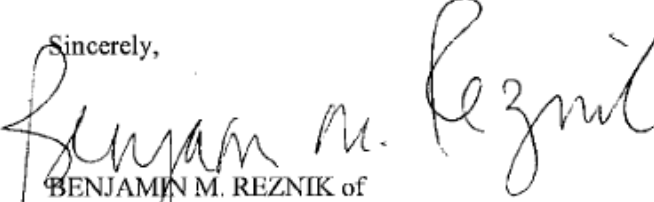
The County must announce the Elden Way parking restrictions through placement of clearly visible signage on the Virginia Robinson Gardens property, and include such restriction on the Virginia Robinson Gardens website and on every Special Use event or other invitation. The County should identify a contact staff person at Virginia Robinson Gardens for neighbors to report any violation of the parking restrictions. The County should support an application by Elden Way property owners to the City of Beverly Hills for a permit parking zone on Elden Way that restricts parking solely to property owners. This will allow the City of Beverly Hills to enforce the parking restrictions as well. The County must take all means necessary to eliminate all street parking and allow use of Elden Way by its residents.

Los Angeles County
July 11, 2014
Page 3

REZ-3
cont.

As we previously stated, the proposed expansion is simply too vast for Virginia Robinson Garden, which is located on a quiet, narrow residential street. The Affected Residents should not have to bear the brunt of 100 extra visitors a week, two additional Special Use events per year, and the expanded hours and the traffic impacts caused by the events and filming. The Recirculated SEIR fails to address these concerns and to adequately evaluate the traffic impacts caused by the Project.

Sincerely,



BENJAMIN M. REZNIK of
Jeffer Mangels Butler & Mitchell LLP

BMR:slb

cc: Supervisor Zev Yaroslavsky
Maria Chong-Castillo
Kathline King, Chief of Planning

L.A. 11153998v2

JMBM | Jeffer Mangels
Butler & Mitchell LLP

Responses to Ben Reznik (REZ), 7/11/2014

REZ-1 This comment provides introductory material and does not raise a specific comment on the content or adequacy of the Recirculated Final SEIR; no further response is required.

REZ-2 This comment states that special events/uses at the Virginia Robinson Gardens generate a number of vehicles, typically associated with vendors for set-up and tear-down (“vendor vehicles”), which idle and park along Elden Way. The commenter goes on to state that these vehicles are in place along Elden Way for minutes and hours daily, for two weeks leading up to and two weeks after each special event creating air quality, noise, and traffic impacts to the residents along Elden Way. Further, that an increase in the number of special events from two to four would increase the number of days annually that these impacts would occur, suggesting that the increase in occurrences should not be considered a “temporary nor insignificant” impact on the residents of Elden Way.

The commenter goes on to suggest that the traffic impacts of special events, including traffic from patrons of the events and vendor vehicles, was not considered in the Recirculated Supplemental EIR for the proposed project. Further, it is stated that the use of an alternative street was not considered for access of patrons to the Virginia Robinson Gardens as well as vendors for special events.

Regarding the consideration of traffic impacts resulting from special events in the environmental analysis, the statement by the commenter is inaccurate. The hosting of special events at the Virginia Robinson Gardens is an existing condition, as noted by the commenter, two times a year, and was considered as part of the existing conditions. Traffic from special events was considered to remain consistent with the characteristics of existing special events and was included as part of the traffic and parking assessment.

With regard to patrons attending an event, the length of time of arrival and departure from such an event is short-term and any effects that might occur would be temporary and happen for a very short period of time, and would not result in a significant and unavoidable impact as determined by standard traffic methodologies and impact thresholds utilized within Los Angeles County. Additionally, as this is an existing condition and the proposed project would not change the characteristics of such special events, effects occurring as a result of a special event would not be exacerbated and would not change the existing or future conditions of each special event. While the number of special events would increase from two to four annually under the proposed project, all effects from special events would continue to be temporary, if at all, and the increase in events per year is not substantial enough to generate a significant and unavoidable traffic impact during each event, nor is the hosting of four such events considered a cumulative impact across an annual period. Parking for special events was also addressed in the Draft Supplemental EIR, and would continue to be facilitated by valet parking attendants, as is the standard for special events throughout the City of

Beverly Hills, including at residences along Elden Way and in the vicinity. A significant parking impact was not identified in the Draft Supplemental EIR.

With regard to vendor vehicles, while these vehicles are necessary to make deliveries for special events, they do not arrive at the site in such high number, with such frequency, or for extended periods of time that impacts to noise, air quality, or traffic would result as defined by CEQA. Further, deliveries (and associated vehicle trips) are temporary in nature and do not change the operating characteristics of traffic along Elden Way such that a significant traffic impact would occur. It should be noted that such deliveries are consistent with and are standard practice for such events throughout the City of Beverly Hills, including at residences along Elden Way and in the vicinity.

In addition, special use events at Virginia Robinson Gardens are strictly managed and continually improved upon by the County to accommodate, as best possible, any concerns of surrounding neighbors. Examples of operational controls that are currently practiced as part of the Virginia Robinson Gardens “Good Neighbor Policy” are listed below:

1. Virginia Robinson Gardens staff and volunteers are required to park off street in the Cove Way Parking Lot.
2. Three cameras with video surveillance monitor vehicle and pedestrian activity at the front drive way and pedestrian gates. This applies to special events and daily operations.
3. A staff person with a two way radio is assigned to the driveway gate to regulate arriving and departing traffic and to assure any vehicle waiting on the street is not blocking a neighbor’s driveway or impeding emergency vehicles. This staff person also ensures that there are no engines idling. This staff person is visible to neighbors and will immediately respond to any concerns that a neighbor may bring to them. Additionally, the two neighbors on either side of Virginia Robinson Gardens that have driveways closest to the Virginia Robinson Gardens driveway have the personal cell phone number of the Virginia Robinson Gardens Superintendent to express any concerns.
4. The Los Angeles County Sherriff’s Department is on site at the front of the property to observe and react to any traffic issues, to liaison with the City of Beverly Hills on any parking issues, and to ensure the event is safe and operations are orderly.
5. All delivery and/or pick up schedules are written and programed with adequate time intervals so as to avoid the trucks overlapping their time on Elden Way.
6. The neighbors on Elden way are given written notification, personally delivered by staff, to each of their mailboxes informing them of the date and time of each special event and, in the case of “Garden Tour”, each neighbor is invited to attend the event as a guest, free of charge.
7. The cul-de-sac on Elden Way is continually monitored by staff, both in person and by camera during operational hours for all events at Virginia Robinson Gardens to identify and deal with any potential parking issues.

8. Additional staff are assigned to Virginia Robinson Gardens during special events to regulate operations to avoid any potential problems with neighbors.
9. Vendors and support staff are required to park at an off- site location and a van is hired to shuttle these individuals to and from Virginia Robinson Gardens to reduce the number of vehicles on Elden Way.

The addition of two special events annually would not exacerbate the existing conditions or change the operating characteristics of Elden Way such that a significant and unavoidable impact would occur.

Finally, the commenter's statement that the use of an alternative street was not considered for access of patrons and vendors for special events is inaccurate. Appendix G of the Recirculated Supplemental EIR (Virginia Robinson Gardens Infeasibility Analysis of Traffic Mitigation Memo) analyzed the use of the entrance and parking area along Cove Way for vendors and deliveries, specifically for special events. It was identified that the pathway between the Cove Way entrance/parking area and the event space involves the climbing of 81 steps, traversing an area that is at a 40 percent grade. Further, the distance between these two locations is over 300 feet. The combination of the topography and the distance from the Cove Way entrance, which is the only alternative entrance to the Virginia Robinson Gardens, makes this infeasible, as outlined in Appendix G.

As a significant impact (presumably traffic, air quality, or noise, as previously identified by the commenter) was not identified along Elden Way, no mitigation measures are required by CEQA. However, all information will be provided to decision-makers for review prior to approval of the project and the measures proposed by the commenter can be taken into consideration. With regard to the commenter's final point, Virginia Robinson Gardens currently has, and will continue to have, a single point of contact for residents to engage with regarding concerns related to operation at the project site.

REZ-3

This comment states that the existing prohibition of street parking along Elden Way by patrons of Virginia Robinson Gardens is not strictly enforced. According to the commenter, this also applies to vendor vehicles. As stated in the response above, there are three cameras with video surveillance to monitor vehicle and pedestrian activity at the front driveway and pedestrian gates. Also, the Recirculated Final Supplemental EIR, Table 1, "Comparison of Existing and Proposed Operations - , Parking, a sign will be posted on the property prohibiting the parking of patrons along Elden Way. It is also standard practice for staff taking visitation reservations to ensure that patrons are parking on site only, and parking reservations are noted on the website as being required. As all parking for daily visitors of the Gardens will be handled on site or on nearby public streets pursuant to parking signs, the proposed project would not result in a significant parking impact, and mitigation measures were not identified, including the need for a special parking zone along Elden Way, as suggested by the commenter. While the County may decide in the future to consider such an application to the City of Beverly Hills, it is not a requirement of the proposed project and is not considered

as part of the proposed project. As stated in Response REZ-2, the Virginia Robinson Gardens currently has, and will continue to have, a single point of contact for residents to engage with regarding concerns related to the operation of the project site.

The commenter also provides conclusory text to which no further response is required.

Francine Rippy (RIP), 7/1/2014

RIP

7/1/14

Mrs Joan Rupert, Section Head
LA Co. Dept. Parks & Recreation
510 S. Vermont Ave
LA Ca. 90020 1975

Dear Joan Rupert

As a member of the Friends of the
Robinson Gardens & Executive Director
of another museum in LA Co. I know
how important it is for families to be able
to spend time together to visit historic
venues. I consider it very important
for the Robinson gardens to be open on
Saturdays to allow visits by people who
are unable to tour such a special
place on work days.

RIP-1

Sincerely
Francine Rippy

R Dr. Francine H. Rippy
1841 Vallecito Dr
Hacienda Heights, CA 91745

RECEIVED

JUL 9 2014 4:11

PLANNING DIVISION

Responses to Francine Rippy (RIP), 7/1/2014

RIP-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Susan Rosenthal (ROS1), 6/20/2014

	<p>From: Susan Rosenthal [mailto:smmr1955@gmail.com] Sent: Friday, June 20, 2014 10:58 AM To: Joan Rupert Subject: Operational changes at VRG</p>	ROS1
ROS1-1	<p>Dear Ms Rupert, As a resident of Los Angeles County and a frequent visitor and volunteer at The Virginia Robinson Gardens, I strongly support the proposed operational changes to The Virginia Robinson Gardens. In particular, the additional trips on Saturdays.</p> <p>Sincerely, Susan Rosenthal 1031 Berkeley Street Santa Monica</p>	

Responses to Susan Rosenthal (ROS1), 6/20/2014

ROS1-1 This comment provides introductory information regarding the commenter and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

PA Ross (ROS2), 6/17/2014

	<p>From: P Reinstein [mailto:quincygirll@hotmail.com] Sent: Tuesday, June 17, 2014 8:10 AM To: Joan Rupert Subject: Extended hours for VRG</p>	ROS2
ROS2-1	<p>I am writing to implore you to consider extended hours and usage of Robinson Gardens in Beverly Hills. Such a beautiful gift as this property should be open so it can be shared with community members who are not available during the current open hours.</p> <p>Having had the opportunity to view the gardens myself several times, it seems a shame that others do not have the same chance.</p> <p>I hope that you will allow this beautiful property to be utilized for fund raising events to maintain the home and grounds the way Virginia Robinson would have wanted.</p> <p>Thank you.</p> <p>PA Ross</p>	

Responses to PA Ross (ROS2), 6/17/2014

ROS2-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Kerstin Royce (ROY), 6/16/2014

	<p>From: Kerstin Royce [mailto:kerstinroyce@gmail.com] Sent: Monday, June 16, 2014 10:03 AM To: Joan Rupert Subject: Virginia Robinson Gardens</p>	ROY
ROY-1	<p>Dear Joan, My two year term as President of Robinson Gardens is now almost over. I don't think that I have to tell you how much I love this magical place, nor the many hours my board, the various committees and other volunteers have devoted to fulfill Virginia Robinson's wishes that her beloved Estate should be open to the public. The Friends are especially proud of the expanded Children's Program. For the first time, we can now open up the gardens to Title One Schools. We can, however, only do this by asking for grants to hire very expensive vans that can drive up to the parking lot on the property. We cannot hire a regular school bus, as a few neighbors will not allow the children to walk up the few yards on Elden Way. One of my goals this term has been to try to introduce younger people to the gardens. This has proven very difficult, as we are not able to be open on Saturdays and Holidays. We are basically only open to welcome senior citizens and as I fall into that group, I certainly don't see anything wrong with that, but surely would like my daughters generation and their kids to be able to experience the beauty of Robinson Gardens as well. Thank you for your support.</p>	
	<p>Warmest regards, Kerstin Sent from my iPad</p>	

Responses to Kerstin Royce (ROY), 6/16/2014

ROY-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Marcella Ruble (RUB), 6/16/2014

RUB-1	<p style="text-align: right;">RUB</p> <p>From: Marcella Ruble [mailto:marcella_ruble@hotmail.com] Sent: Monday, June 16, 2014 9:08 PM To: Joan Rupert Subject: Public Comment on The Virginia Robinson Gardens</p> <p>Dear Ms. Rupert:</p> <p>I am writing to you with regard to The Virginia Robinson Gardens. The request under current consideration by the Los Angeles County Board of Supervisors to extend the Gardens hours of operation should include Saturdays. I have been informed that there is a public comment period on whether the Gardens can extend their times of operation until July 12, 2014, and was given your e-mail address to submit my comments.</p> <p>As a long time supporter of Beverly Hills and the Gardens, I truly believe that the addition of Saturday operations would be beneficial for the Gardens as well as the Los Angeles and Beverly Hills communities as a whole. Currently, the hours of operation for the Gardens are Tuesdays through Fridays from 10:00 a.m. to 4:00 p.m. These hours are very restrictive as many people work during the day, including myself, and cannot take time off during the work week to enjoy the Gardens. Furthermore, while some children may have an opportunity to visit the Gardens as part of a school field trip during the school hours, the Gardens' extremely limited schedule still precludes too many people from visiting the Gardens. I would very much like to be able to attend a garden tour or a class on Saturdays as many others in the community also would like to do. Please assist us in preserving the cultural heritage of Los Angeles by allowing the Gardens to be open to a large segment of the population that cannot now appreciate this important legacy of Los Angeles' history due to its extremely restrictive schedule of operation.</p> <p>Thank you for your time and consideration. With warm regards, Marcella Ruble</p>
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Responses to Marcella Ruble (RUB), 6/16/2014

RUB-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Lili Sandler (SAN), 7/3/2014

SAN-1	<p style="text-align: right;">SAN</p> <p>From: Lili Sandler [mailto:lilisandler1@gmail.com] Sent: Thursday, July 03, 2014 12:34 AM To: Joan Rupert Subject: Virginia Robinson Gardens</p> <p>Dear Joan Rupert,</p> <p>Please support the proposed operational changes for Virginia Robinson Gardens and allow them to be open on Saturdays. The gardens are beautiful, yet many local residents don't even know about them because their hours are so limited. I live a few miles away and my neighbors have never visited. Please allow them to open their doors on Saturday so that everyone has a chance to enjoy this treasure.</p> <p>Thank you, Lili Sandler Sent from my iPad</p>
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Responses to Lili Sandler (SAN), 7/3/2014

SAN-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Joan Selwyn (SEL), 7/3/2014

From: joan selwyn [<mailto:selwynjoan@icloud.com>] **SEL**
Sent: Thursday, July 03, 2014 4:37 PM
To: Joan Rupert
Subject: Virginia Robertson Gatdend

SEL-1 I strongly support the proposed operational changes to the Virginia Robinson Gardens. In particular the additional proposed trips on Saturdays. There are few beautiful gardens and historical sites for families to enjoy in our crowded and traffic laid end cities.
Joan Selwyn
300 North Swall Drive 103
Beverly Hills 09211

Sent from my iPhone

Responses to Joan Selwyn (SEL), 7/3/2014

SEL-1 This comment is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Pam Shimizu (SHI), 7/4/2014

From: pshimizu123@aol.com [<mailto:pshimizu123@aol.com>] **SHI**
Sent: Friday, July 04, 2014 11:23 AM
To: Joan Rupert
Subject: Robinson Gardens

SHI-1 I support expanding public hours of Robinson Gardens so that more citizens and school children have the opportunity to experience the garden.
Thank you for counting my support.
Pam Shimizu

Responses to Pam Shimizu (SHI), 7/4/2014

SHI-1 This comment is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Diane Sipos (SIP), 6/27/2014

June 27, 2014		SIP
Dear Joan Rupert, (jrupert@parks.lacounty.gov)		
SIP-1		As a resident (your city) and a frequent visitor to The Virginia Robinson Gardens, I strongly support the proposed operational changes to The Virginia Robinson Gardens. In particular, the additional project trips on Saturdays.
Sincerely,		
Diane Sipos 1370 Palms Blvd. Venice, CA 90291		

Responses to Diane Sipos (SIP), 6/27/2014

SIP-1 This comment provides introductory information regarding the commenter and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Tracy Smith (SMI), 6/27/2014

June 27, 2014		SMI
Dear Joan Rupert,		
SMI-1		As a resident of Brentwood and a frequent visitor to The Virginia Robinson Gardens, I strongly support the proposed operational changes to The Virginia Robinson Gardens.
In particular, the additional project trips on Saturdays.		
Sincerely,		
Tracy Berliner Smith 169 North Canyon View Drive Los Angeles, CA 90049		

Responses to Tracy Smith (SMI), 6/27/2014

SMI-1 This comment provides introductory information regarding the commenter and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Gwen Stauffer (STA), 7/3/2014

STA

From: Gwen Stauffer [<mailto:gstauffer@lotusland.org>]
 Sent: Thursday, July 03, 2014 12:01 PM
 To: Joan Rupert
 Cc: 'Jeanne Anderson'
 Subject: Virginia Robinson Gardens

Dear Ms. Rupert,

I am writing to you in support of expanded operations for Virginia Robinson Gardens (VRG) as proposed in the Los Angeles County Full Environmental Impact Report. I am the Executive Director at Lotusland in Santa Barbara, where Lotusland is also required to operate under a Conditional Use Permit issued by Santa Barbara County. I am extremely familiar with all aspects of a cultural organization operating within a residential community, both for the organization and the residents. I fully appreciate what it takes for such an organization to sustain itself with operational restrictions, and I also fully appreciate how important those restrictions are to the residents. Putting all of that aside, there are numerous reasons why these modified restrictions should be allowed for Virginia Robinson Gardens.

First, the staff and Friends managing the gardens have done everything within their power to be good neighbors and respectful community citizens. Their record is impeccable. Even while VRG is asking for more days to operate, it is clear that they also recognize that asking for such changes requires they give something back, and they have done so by making concessions in the operations, such as shortening the daily hours of operations and ensuring that their visitors do not park on Elden Way, among other things. The specifics of their modifications requests indicate that the VRG management has a very good understanding of how to also operate most efficiently and effectively to honor and provide for the peace and privacy of its neighbors, and also make the garden accessible at the most critical times for all the rest of Los Angeles County's citizens.

STA-1

Second, VRG is a gem in the crown of Los Angeles County. It is a significant historic estate that is one of the few remaining, intact and open to the public, from the Golden Age of estate building in Los Angeles. More than being on the National Register of Historic Places, the estate includes especially noteworthy period architecture and garden design, and also has one of the most important botanical collections in Los Angeles County, particularly the Australian king palm forest. As one of Los Angeles County's Department of Parks and Recreation sites, every single Los Angeles County resident deserves the opportunity to experience this amazing place.

The fact is, the operational restrictions placed on VRG makes it very difficult for management to make VRG easily accessible to all - an ironic situation since access is what the public expects of Los Angeles County and all cultural organizations. In truth, the modifications VRG is requesting do not come near to achieving total or even easy access, but it is a very small step towards providing key opportunities for limited access to targeted Los Angeles County residents who have the most to gain from the experience. These citizens should not be denied.

Finally, Los Angeles County has a financial stake in the operations of VRG. Even though VRG - and therefore the Department of Parks and Recreation for Los Angeles County - enjoys robust support from an highly engaged group of Friends, VRG cannot operate on that support alone, and not only must, but is expected to generate earned revenue to care for itself. Los Angeles County and VRG are exceedingly fortunate to have such a dedicated Friends group, made up of influential Los Angeles County citizens who want to see VRG preserved for future generations of County citizens. Their support should not be taken for granted by Los Angeles County, and their efforts alone are worthy of granting these modifications. They can do more to preserve VRG and share it with all, but it is absolutely essential that Los Angeles County partner with them to ensure success for both VRG and the Department of Parks and Recreation. Approval of

STA-1
Cont. ↑ these modifications will help ensure that the VRG Friends not only can, but will, continue with their efforts to support Los Angeles County Department of Parks and Recreation and Virginia Robinson Gardens for all.

■ Thank you, in advance for your consideration.

Most respectfully,

Gwen Stauffer

Executive Director
Ganna Walska Lotusland

Responses to Gwen Stauffer (STA), 7/3/2014

STA-1 This comment is in support of the proposed project, evidenced by a short list of outlining the reasons. As none of the identified reasons is a direct comment on the content or adequacy of the Recirculated Final 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.

Sydney Tanner (TAN1), 7/9/2014

From: Sydney Tanner [<mailto:sydneytanner@sbcglobal.net>]
Sent: Wednesday, July 09, 2014 9:02 AM
To: Joan Rupert
Subject: Virginia Robinson's Gardens

TAN

July 9, 2014

Dear Joan Rupert,

TAN-1 ■ **As a resident of Los Angeles and a frequent visitor to The Virginia Robinson Gardens, I strongly support the proposed operational changes to The Virginia Robinson Gardens. In particular, the additional project trips on Saturdays.**

**Sincerely,
Sydney Tanner**

*Sydney Tanner
7500 W. 82nd Street
Playa Del Rey
CA 90293
(310) 670-6012*

Responses to Sydney Tanner (TAN1), 7/9/2014

TAN1-1 This comment provides introductory information regarding the commenter and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Mike Tang (TAN2), 7/10/2014

	<p>From: Mike Tang [mailto:miket@gibsonusa.com] Sent: Friday, July 11, 2014 11:37 AM To: Joan Rupert Subject: OUR SUPPORT AND COMMENT TO LA COUNTY</p>	TAN2
TAN2-1	<p>I'm glad to know that the county is considering to have additional round trips on Saturdays, that will be a good news for people who have to work on weekdays. We've been there this June, my wife and I love the Garden, we'll be back soon.</p> <p>Thank you,</p> <p>Mike Tang</p>	

Responses to Mike Tang (TAN2), 7/10/2014

TAN2-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Charles Tellalian (TEL1), 6/15/2014

	<p>From: Charles Tellalian [mailto:sequoiaretir@earthlink.net] Sent: Sunday, June 15, 2014 3:12 PM To: Joan Rupert Subject: Robinson Gardens</p>	TEL1
TEL1-1	<p>I ask your support in expanding the services that can be offered by Robinson Garden. It has been and can continue to be an even greater benefit for the people of Los Angeles.</p> <p>Your attention and consideration is appreciated.</p> <p>Sincerely,</p> <p>Charles Tellalian sequoiaretir@earthlink.net</p>	

Responses to Charles Tellalian (TEL1), 6/15/2014

TEL1-1 This comment is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Alex Tesoriero (TES1), n.d.

TES1-1	<p>Ms. Joan Rupert Section Head LA County Department of Parks and Recreation 510 South Vermont Ave. LA, CA 90020-1975</p>	TES1
	<p>Dear MS Rupert;</p> <p>As a Pacific Palisades resident for 16 years ,I love so many of the parks and special LA county recreation sites available to us ,in close proximity of our home. One in particular is a small gem, Virginia Robinson Gardens , which I think is unique and special.</p> <p>.I think that the historic house and gardens currently doesn't have the exposure to the public or the availability to visit as frequently as it deserves , especially as a county park and site.</p> <p>I highly support the Saturday opening of the VRG to the public, and strongly endorse the plan currently under review.</p> <p>Thank You , Alex Tesoriero 1177 Piedra Morada Pacific Palisades, Ca 90272</p>	

Responses to Alex Tesoriero (TES1), n.d.

TES1-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Jaqueline Tesoriero (TES2), n.d.

	<p>Ms. Joan Rupert Section Head LA County Department of Parks and Recreation 510 South Vermont Ave. LA, CA 90020-1975</p>	TES2
	<p>Dear MS Rupert;</p>	
TES2-1	<p>As a Pacific Palisades resident for 16 years ,I love so many of the parks and special LA county recreation sites available to us ,in close proximity of our home. One in particular is a small gem, Virginia Robinson Gardens , which I think is unique and special. .I think that the historic house and gardens currently doesn't have the exposure to the public or the availability to visit as frequently as it deserves , especially as a county park and site. I highly support the Saturday opening of the VRG to the public, and strongly endorse the plan currently under review.</p>	
	<p>Thank You , Jacqueline Tesoriero 1177 Piedra Morada Pacific Palisades, Ca 90272</p>	

Responses to Jaqueline Tesoriero (TES2), n.d.

TES2-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Joseph Tesoriero (TES3), n.d.

	<p>Ms. Joan Rupert Section Head LA County Department of Parks and Recreation 510 South Vermont Ave. LA, CA 90020-1975</p>	TES3
	<p>Dear MS Rupert;</p>	
TES3-1	<p>As a Pacific Palisades resident for 16 years ,I love so many of the parks and special LA county recreation sites available to us ,in close proximity of our home. One in particular is a small gem, Virginia Robinson Gardens , which I think is unique and special. .I think that the historic house and gardens currently doesn't have the exposure to the public or the availability to visit as frequently as it deserves , especially as a county park and site. I highly support the Saturday opening of the VRG to the public, and strongly endorse the plan currently under review.</p>	
	<p>Thank You , Joseph Tesoriero 1177 Piedra Morada Pacific Palisades, Ca 90272</p>	

Joseph Tesoriero (TES3), n.d.

TES3-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Rolf Tillmann (TIL3), 7/1/2014

	<p>From: bid2r@aol.com [mailto:bid2r@aol.com] Sent: Tuesday, July 01, 2014 10:28 AM To: Joan Rupert Subject: Virginia Robinson Gardens EIR</p> <p>July 1, 2014</p> <p>Dear Joan Rupert,</p> <p>As a resident of San Pedro and a frequent visitor to The Virginia Robinson Gardens, I strongly support the proposed operational changes to The Virginia Robinson Gardens.</p> <p>In particular I support the additional project trips on Saturdays as enriching to all community members who are unable to participate in Robinson Gardens activities during the week. This is what Mrs. Robinson envisioned when she donated her property to the County of Los Angeles and it is necessary for the enjoyment and education of the community.</p> <p>Sincerely,</p> <p><i>Rolf Tillmann</i></p> <p>2828 Baywater Avenue Number 1 San Pedro, California 90731</p>	TIL3
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Rolf Tillmann (TIL3), 7/1/2014

TIL3-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Kathleen Toppino (TOP), 6/27/2014

TOP

From: Kathy Toppino [<mailto:Kathy@thetoppinos.com>]
Sent: Friday, June 27, 2014 6:07 PM
To: Joan Rupert
Subject: Proposed Changes to Virginia Robinson Gardens EIR

Dear Joan,

TOP-1 ■ I am writing to give my support for the proposed changes to the operations of Virginia Robinson Gardens that would allow additional visits to the Gardens on Saturdays. I am a resident of Los Angeles, a former President of the Friends of Robinson Gardens and member for the past 15 years, and a frequent visitor to this beautiful estate. I strongly support Saturday operations to give more people the chance to share in the magic of this property.

■ Thank you for your consideration.

Sincerely,

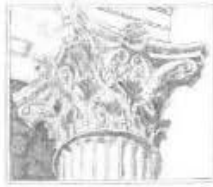
Kathleen Toppino
572 Moreno Avenue
Los Angeles, CA 90049

Kathleen Toppino (TOP), 6/27/2014

TOP-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Andrew Tullis (TUL), 6/27/2014

TUL



RICHARD MANION
ARCHITECTURE INC.

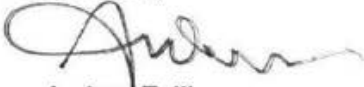
June 27, 2014

Dear Joan Rupert, (jrupert@parks.lacounty.gov)

TUL-1

As a resident of Los Angeles County and a frequent visitor to The Virginia Robinson Gardens, I strongly support the proposed operational changes to The Virginia Robinson Gardens. In particular, the additional project trips on Saturdays.

Sincerely,



Andrew Tullis
Architect

President, Institute of Classical Architecture and Art
Southern California Chapter

11150 W. OLYMPIC BOULEVARD, SUITE 800
LOS ANGELES, CALIFORNIA 90064
TEL 310.858.8525 WWW.RICHARDMANION.COM

Andrew Tullis (TUL), 6/27/2014

TUL-1 This comment provides introductory information regarding the commenter and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Tina Varjian (VAR), 6/12/2014

VAR-1	<div style="text-align: right; font-weight: bold; font-size: 1.2em;">VAR</div> <p>From: Tina Varjian [mailto:tdvarjian@aol.com] Sent: Thursday, June 12, 2014 2:12 PM To: Joan Rupert Subject: Public Comment Re The Virginia Robinson Gardens of Beverly Hills</p> <p>Dear Ms. Rupert:</p> <p>I am writing to you with regard to The Virginia Robinson Gardens in Beverly Hills and the request under current consideration by the Los Angeles County Board of Supervisors to extend the Gardens hours of operation to include Saturdays. I have been informed by the Gardens that there is a public comment period for this very subject until July 12, 2014, and was given your e-mail address to submit my comments in support of this request and I do so here.</p> <p>As a former and long time resident of Beverly Hills and potential volunteer for the Gardens, I truly believe that the addition of Saturday operations would be beneficial for the Gardens as well as the Los Angeles and Beverly Hills communities as a whole. Currently, the hours of operation for the Gardens are Tuesdays through Fridays from 10:00 a.m. to 4:00 p.m. These hours are very restrictive as most persons work during the day, including myself, and cannot take time off during the work week to enjoy the Gardens and all its rich history. Furthermore, while some children may have an opportunity to visit the Gardens as a field trip during the school hours, the Gardens' current hours still preclude families from visiting the Gardens together- as parents are working and children are in school Tuesdays through Fridays. I would very much like to volunteer my time to the Gardens by assisting in its preservation and possibly act as a docent and share its dynamic history with other visitors. I was disheartened to learn that the Gardens did not operate on Saturday – which I believe is a day that would bring a lot more visitors who otherwise have busy schedules to contend with during the week and look to the weekends to make time to enjoy museums and other outdoor activities with their families and friends, which could include the Gardens.</p> <p>Let's not keep the Gardens a secret any longer ...it's time to open them up to welcome more visitors on beautiful Saturday mornings to afternoons!</p> <p>Thank you for your time and consideration.</p> <p>~Tina D. Varjian</p>
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Tina Varjian (VAR), 6/12/2014

VAR-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Madeleine Wagner (WAG), 6/21/2014

From: Clare Wagner [<mailto:mcw343@pacbell.net>]
Sent: Saturday, June 21, 2014 1:33 PM
To: Joan Rupert
Subject: Support for Virginia Robinson Gardens Operational Changes

WAG

Dear Ms. Rupert,

WAG-1 I am a resident of Los Angeles County and live quite close to Virginia Robinson Gardens. I visit often, taking full advantage of the wonderful programs they offer. Therefore I strongly support the proposed operational changes to the Gardens, in particular, the additional project trips on Saturdays. This change would allow greater opportunity for Los Angeles County residents to experience their terrific programs as well as well as to tour the beautiful gardens.

Thank you for any assistance you can offer in favor of this issue.

Sincerely,

Madeleine Clare Wagner
2515 Angelo Dr.
Los Angeles, CA 90077

Madeleine Wagner (WAG), 6/21/2014

WAG-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Katherine Winn (WIN), 7/3/2014

From: katherine winn [<mailto:kittwinn@gmail.com>]
Sent: Thursday, July 03, 2014 12:23 PM
To: Joan Rupert
Subject: Robinson Gardens

WIN

Dear Ms. Rupert,

WIN-1 I have been one of the lucky few who has enjoyed an afternoon or evening wondering the most extraordinary gardens and home know as Robinson Gardens. I've often thought that it's a shame that this beautiful resource is not more available to the people in the Los Angeles area.

Katherine Winn

--
Kitty Winn
(310) 428-7462

Katherine Winn (WIN), 7/3/2014

WIN-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

J Dale Witt (WIT), 7/7/2014

WIT-1	<p>From: Dale Witt [mailto:jdww_cedrus@yahoo.com] Sent: Monday, July 07, 2014 9:37 PM To: Joan Rupert Subject:</p> <p>Hello Ms. Rupert: I am writing to encourage your decision-making committee to favorably consider allowing the Virginia Robinson Gardens to be open on Saturdays and some holidays. It would allow for a greater diversity of persons to visit who otherwise must work during the week. Additionally, many families could visit together when their children are out of school. Such a beautifully-preserved example of southern California culture from the turn of the century deserves to be appreciated by contemporary generations who otherwise might not experience it. Since groups are by reservation and limited in size, and the parking is on-site, I believe it would not represent a hardship on the neighborhood.</p> <p>Thank you for your consideration. Mr. J. Dale Witt former resident caretaker VRG (310) 916-7859</p>	WIT
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Responses to J Dale Witt (WIT), 7/7/2014

WIT-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Jamie Wolf (WOL1), 6/27/2014

	<p>From: Jamie Wolf [mailto:jrw@artnet.net] Sent: Friday, June 27, 2014 5:30 PM To: Joan Rupert Subject: Virginia Robinson Gardens, Saturday visits</p> <p>June 27th, 2014</p> <p>Dear Joan Rupert, I'm a resident of Beverly Hills, and a frequent visitor to the Virginia Robinson Gardens, where I volunteer my services as a devoted gardener. I have a beautiful garden of my own, but others who may not have that luxury are especially lucky that the VRG is available for them to spend time in, to enjoy its botanical offerings as well as the education about plants and garden design it's able to provide. There are many people whose only opportunity to visit is after the work week...a limitation that's also true for full-time students. For these visitors in particular, the proposed additional trips to be allowed on Saturday will be immensely valuable, and in my observation, operation during the daytime hours imposes minimal impact on the residents of the immediately adjoining neighborhood. I strongly support the operational changes that will make these visits possible.</p> <p>Sincerely, Jamie Wolf 812 North Foothill Road Beverly Hills, California 90210</p> <p>resident (your city) and a frequent visitor to The Virginia Robinson Gardens, I strongly support the proposed operational changes to The Virginia Robinson Gardens. In particular, the additional project trips on Saturdays.</p> <p>Sincerely, Name and street address and city</p>	<p>WOL1</p>
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Jamie Wolf (WOL1), 6/27/2014

WOL1-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Donna Wolff (WOL2), 6/17/2014

WOL2-1	<p>From: Donna Wolff [mailto:dwolff@mjwolff.com] Sent: Tuesday, June 17, 2014 2:42 PM To: Joan Rupert Subject: virginia robinson gardens</p> <p>Dear Ms Rupert,</p> <p>As a founding member of The Friends of Robinson Gardens, past President of the Friends and creator of the " ... into the garden" Garden Tour (now in its 26th year) I would like to add my voice to those who are in favor of extending the days/hours the facility is open to the public. This historic property continues to evoke wonder and surprise when it is 'discovered' by the public. Descriptions like 'hidden gem' are often used by journalists when writing about it. Our goal as an organization has always been to preserve the integrity of the property but, just as importantly, to share its history and horticultural riches with the public. I hope you will support our efforts by encouraging the Los Angeles County Board of Supervisors to vote in favor of expanded public hours for Robinson Gardens.</p> <p>Sincerely,</p> <p>Donna Wolff</p>	WOL2
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Donna Wolff (WOL2), 6/17/2014

WOL2-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

Karen Wolfen (WOL3), 7/7/2014

	<p>From: KAWolfen@aol.com [mailto:KAWolfen@aol.com] Sent: Monday, July 07, 2014 10:56 PM To: Joan Rupert Subject: Virginia Robinson Gardens</p>	WOL3
	<p>Dear Ms. Rupert,</p> <p>■ I am a Beverly Hills resident who has never had the opportunity to visit the Virginia Robinson Gardens. I recently inquired about arranging to visit with my daughter, but work schedules prevent us from seeing the Gardens because of the weekday only tour schedule. I strongly support the proposed operational changes to allow Saturday visits. Obviously, additional trips to the venue can be controlled with a cap on daily visitors. The changes make complete sense for this resource to be made just slightly more available to the public to enjoy.</p> <p>■</p>	
	<p>Sincerely,</p> <p>Karen Wolfen</p> <p>919 N. Roxbury Dr.</p> <p>Beverly Hills, CA 90210</p>	

Karen Wolfen (WOL3), 7/7/2014

WOL3-1 This comment provides anecdotal information regarding the project site and is in support of the proposed project. As this comment is not a direct comment on the content or adequacy of the Recirculated Final 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.

CHANGES TO THE DRAFT SUPPLEMENTAL EIR

Text changes are intended to clarify or correct information in the Draft SEIR in response to comments received on the document, or as initiated by the Lead Agency staff. Revisions are shown in Section 9.2 (Text Changes) as excerpts from the Draft SEIR text, with a ~~line through~~ deleted text and a double underline beneath inserted text. In order to indicate the location in the Draft SEIR where text has been changed, the reader is referred to the page number of the Draft SEIR as published on September 12, 2012.

TEXT CHANGES

This section includes revisions to text, by Draft SEIR section, that were initiated either by Lead Agency staff or in response to public comments. All changes appear in order of their location in the Draft SEIR.

Contents, page iv, Appendices

Appendices

- Appendix A Air Quality Modeling
- Appendix B CNDDDB Search Results
- Appendix C Historic Resources Memorandum
- Appendix D Greenhouse Gas Emissions Calculations
- Appendix E Noise Modeling
- Appendix F Traffic Impact Analysis [revised]
- Appendix G Virginia Robinson Gardens Infeasibility Analysis of Traffic Mitigation Memo

“Introduction” section, page 4, Table 1

Table 1 Comparison of Existing and Proposed Operations		
Limitation	Current Operating Schedule	Proposed Operating Schedule
Days Open to the Public	<ul style="list-style-type: none"> ■ Tuesday to Friday: 4 days per week ■ Closed on holidays 	<ul style="list-style-type: none"> ■ Tuesday-Monday to Saturday: 5-6 days per week ■ <u>Closed Sunday</u> ■ Open on holidays, with the exception of <u>Thanksgiving</u>, Christmas Day, and New Years Day. Generally, operating hours would follow the County holiday schedule meaning, for example, that if a holiday falls on a Sunday and is observed on a Monday, Virginia Robinson Gardens would be closed on Sunday and open on Monday.
Hours for Public Use	<ul style="list-style-type: none"> ■ 6 hours per day (9:30 AM to 3:30 PM) 	<ul style="list-style-type: none"> ■ 8.5 hours per day (9:30 AM to 5:30<u>4:00</u> PM)
Number of Patrons in Attendance	<ul style="list-style-type: none"> ■ With advanced reservations: <ul style="list-style-type: none"> > 100 visitors per day for public tours; OR > 80 visitors per day for classes/seminar or commercial filming 	<ul style="list-style-type: none"> ■ With advanced reservations: <ul style="list-style-type: none"> > 100 visitors per day for docent tours, seminar/classes, or commercial filming (video only, no motion picture) or a combination of any of these activities

Table 1 Comparison of Existing and Proposed Operations

Limitation	Current Operating Schedule	Proposed Operating Schedule
Types of Events	<ul style="list-style-type: none"> ■ Educational programs to include special tours of the grounds for biology, botany, and horticulture groups, with related classes and seminars 	<ul style="list-style-type: none"> ■ 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
Commercial Filming	<ul style="list-style-type: none"> ■ Allowed Tuesday–Friday between the hours of 9:30 AM and 3:30 PM (6 hours/day) when no tours or other events are scheduled 	<ul style="list-style-type: none"> ■ Commercial filming would conform to the restrictions listed above <u>in this document</u>
Special Uses	<p>Special uses are limited to two per year, currently consisting of:</p> <ul style="list-style-type: none"> ■ Patron Party (7:00 PM to 12:00 AM) attended by approximately 250 guests for a sit-down dinner/dance ■ Garden Tour (10:00 AM to 4:00 PM) attended by approximately 675 guests, staggered throughout this time period <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. Additionally, the event <u>must comply voluntarily complies</u> with city ordinances, which require no amplified music after 10:00 PM, and valet service must obtain city parking permits for use of public streets to avoid overlapping events with surrounding neighbors.</p>	<p>Special uses limited to six-four per year, with expanded themes to include, but not be limited to:</p> <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 tours 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 ■ Offer temporary exhibits to feature and interpret the many artifacts in the collections at Virginia Robinson Gardens <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><u>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. Additionally, the event voluntarily complies with city ordinances, which require no amplified music after 10:00 pm, and valet service must obtain city parking permits for use of public streets to avoid overlapping events with surrounding neighbors.</u></p>
Parking	<ul style="list-style-type: none"> ■ With advanced reservations: <ul style="list-style-type: none"> > Parking required on the property (20 spaces available) > No street parking is permitted > Even with advanced reservations visitors are not allowed to walk on public sidewalks to reach the garden or be dropped off at front gate 	<ul style="list-style-type: none"> ■ With advanced reservations: <ul style="list-style-type: none"> > Parking required on the property (<u>22 spaces, upper parking lot, entrance off Elden Way</u>) > No street parking permitted, <u>including along Elden Way. Further, a sign will be posted on the property indicating that no parking on Elden Way is allowed for visitors</u> > With advanced reservation, allow visitors to walk to the gardens from nearby public streets pursuant to street signs; visitors could also walk to the gardens from public transportation (primarily buses, but also to include taxi) > <u>With limited exceptions, allow visitors to be dropped off at the entrance of the gardens (e.g., via the City of Beverly Hills free ride for disabled residents)</u> > <u>With limited exception, allow street parking, if a vehicle does not fit through driveway gate or porte cochere</u> ■ Overflow visitor parking (valet) and staff/volunteer parking allowed on the lower tennis court, accessed from Cove Way (<u>20 cars</u>)

SOURCE: Los Angeles County Department of Parks and Recreation (2012).

“Introduction” section, page 6, “Site Access, Circulation, and Parking” section, fourth and fifth paragraphs

Per the current operations of the Virginia Robinson Gardens, patrons must park on site; no public, on-street parking is allowed for visitors. As shown on Figure 2, ...

Elden Way is the only roadway in the vicinity that provides unrestricted on-street parking. ... Parking on site is thus a functional requirement (rather than an environmental requirement). However, a sign will be posted on the property indicating that no parking along Elden Way is allowed for visitors.

“Introduction” section, page 9, “Days of the Week” section, second paragraph

The proposed project would ensure that the Virginia Robinson Gardens are available for visitation 56 days a week, ~~Tuesday~~ Monday through Saturday. Further, the facility would be open on holidays, with the exception of Thanksgiving, Christmas Day, and New Years Day. ...

“Introduction” section, page 9, “Hours of Use” section, second paragraph

The proposed project would expand the daily operating hours to 86.5 hours per day, consistent with typical working hours, from 9:30 AM to ~~5:30~~4:00 PM. Accordingly, the hours of use would not substantially conflict with the surrounding neighborhood’s residential functions. The operating hours would also be expanded to include both Monday and Saturday. The change in operating hours would meet the primary goals of the Virginia Robinson Gardens by increasing public access and allowing daily docent tours to begin and end later in the afternoon (however, the number of patrons daily would remain the same). Also, this change would provide greater flexibility for educational programming, as courses could begin and end later in the day, thereby serving a wider audience. Additionally, this change would enable more working families to enjoy the facility on Saturdays.

“Introduction” section, page 10, “Number of Patrons” section, last paragraph

This change would not alter the existing maximum number of visitors on site daily (100) but would allow greater flexibility for the Virginia Robinson Gardens to provide programming that meets public interests while simultaneously meeting the goal of greater site accessibility. For example, under the proposed project, a 49-member class/seminar could be offered in the morning and a 51-person tour in the afternoon. However, under current operations, if both a tour and a class/seminar are offered in the same day, the total number of visitors is restricted to 50 people per tour at 10:00 AM and 1:00 PM or 100 visitors per day, or if a seminar or luncheon is scheduled, visitation is restricted to 80 persons. All public visitations would continue to require advanced reservations and parking on site. The maximum number of daily visitors (100) excludes any staff or security on site.

“Introduction” section, page 11, “Special Uses” section, first full paragraph

Under the proposed project, special uses at the site would be increased to ~~six~~ four events annually. The themes of the special uses would be expanded, at the discretion of the property Superintendent, but would continue to focus on the cultural and historical interpretation of the Virginia Robinson Gardens. Example themes could include the following:

“Introduction” section, page 11, “Parking” section

Currently, an advanced reservation is required for parking to ensure that all visitors are able to park on site. No street parking is permitted by visitors. Further, visitors cannot arrive to the site by foot and cannot be dropped off at the front gate (e.g., by taxi).

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 would continue to be prohibited. ~~The sole exception would be to allow single vehicles to park in the Elden Way cul-de-sac if they do not fit through the driveway gate or the 8-foot-by-8-foot porte cochere.~~ A sign will be posted on the property indicating that no parking along Elden Way is allowed for visitors. Additionally, with advanced reservations, visitors would be allowed to arrive at the 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 taxis). An analysis of available off-site parking options was prepared as part of the proposed project and can be found in Appendix G of this document.

“Environmental Factors Potentially Affected” section, page 16, first paragraph/table

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture/Forestry Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology/Soils |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards/Hazardous Materials | <input type="checkbox"/> Hydrology/Water Quality |
| <input type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Noise |
| <input type="checkbox"/> Population/Housing | <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation |
| <input checked="" type="checkbox"/> Transportation/Traffic | <input type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Mandatory Findings of Significance |

“Determination” section, page 16, fourth bullet

DETERMINATION

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “significant impact”, “potentially significant impact,” or “less than significant unless mitigated” impact on the environment, but at least one effect (1) has been

adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. A SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT is required.

- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

“Environmental Analysis” Section I (Aesthetics), page 49, third full paragraph

The proposed project would continue to maintain and preserve the Virginia Robinson Gardens and its historic structures and gardens, which is key to maintaining the current aesthetic conditions of the area. The proposed project would not construct new buildings, alter existing buildings, or alter the visual aspects of the site in any way. As such, the proposed project would not degrade the visual character or quality of the site or its surroundings. However, the proposed project would allow visitors to walk to the gardens from nearby residences or public transit stops (Los Angeles Metro). ~~With limited exception, the proposed project would allow visitors to park on the street when a vehicle cannot fit down the narrow, single-lane driveway or through the narrow porte cochere.~~ The movement of visitors through the surrounding neighborhood ~~and the potential for a limited number of parked cars along Elden Way~~ would create a new, short-term, visual element to the project area. However, as Elden Way is the only street in the surrounding neighborhood with unrestricted parking, the cul-de-sac frequently contains construction and landscaping vehicles parked by workers at estates on the surrounding streets. ~~As such, the infrequent (and prearranged) parking of a vehicle on Elden Way associated with the Virginia Robinson Gardens would not change the visual characteristics of the streetscape.~~ No more additional cars will be allowed to park on the street under the proposed project than are currently allowed. ~~The only potential difference is that some of those cars will be patrons of Virginia Robinson Gardens and not just other visitors to the neighborhood.~~ Further, due to the short-term and minor nature of this new visual element, the proposed project ~~As such, the proposed project~~ would not substantially degrade the existing visual character or quality of the project area, resulting in a *less-than-significant* impact.

“Environmental Analysis” Section I (Aesthetics), page 50, first paragraph

The proposed project does not include any new permanent sources of light or glare on the project site. ... Although the proposed project would increase special events from two per year to ~~six~~ four per year, most of these events would occur during daytime hours, such Garden Tours, public tours for donors, performing arts, and temporary exhibits. ...

“Environmental Analysis” Section I (Aesthetics), page 50, third paragraph

Currently, visitors are not allowed to park on the street ~~and walk into the project site, but with the proposed project, limited, prearranged street parking would be allowed if a vehicle does not fit through the narrow, single-lane driveway or through the narrow porte cochere.~~ As such, a limited number of cars associated with the proposed project could be parked infrequently on the adjacent residential streets; this would continue under the proposed project as parking along Elden Way would be restricted for visitors. ~~Further,~~

~~a sign would be posted on the property indicating this restriction.~~ Light could reflect off of visitor car windows parking on site and create glare on surrounding residential properties. However, this impact would be temporary, as cars associated with the proposed project site would ~~not usually be permitted to park on the street for daily operations and visitors would be required to leave the site by 5:30 PM daily~~ be parking on site and only along Elden Way as they approach for entrance. Further, the proposed project would not change the amount of allowable street parking in the project area. Under the proposed project, no more cars would be allowed to park on the street than are currently allowed. ~~The only change from existing conditions would be that some cars parked along streets leading to the project site would be patrons of Virginia Robinson Gardens, in addition to other visitors to the neighborhood.~~ Because no new parking would be created on or off the project site, no additional vehicles would be able to park on the street and light and glare associated with parked cars would remain largely the same as conditions currently.

“Environmental Analysis” Section III (Air Quality), page 54, third paragraph

Table 2 (Criteria Pollutant Emissions [lbs/day]) shows the results of the criteria pollutant analysis. The emissions calculations factor in the proposed increase in days of operation per week (from 4 days to 56 days) and the increase of special events per year (from two events to ~~six~~ four events). The minor change in site operations results in additional operational emissions on an annual basis; however, these air quality emissions are well below the SCAQMD thresholds of significance (less than 1 percent of each threshold). Further, it is important to note that the daily emissions and the single-event emissions would remain the same as existing, because the same number of people would be permitted to access the site during these times. The minor change in criteria pollutant emissions occurs over the course of the year with ~~one two~~ additional days per week and ~~four two~~ additional special events per year. Further, air quality emissions and associated impacts are based on a per-day emission level and threshold. As such, proposed project is not anticipated to violate any air quality standard or to contribute significantly to an existing air quality violation and would result in a *less-than-significant* impact.

“Environmental Analysis” Section III (Air Quality), pages 55 to 56, “CO Hotspot Analysis” section

A carbon dioxide (CO) “hot spot,” or area of high CO concentration, can occur at traffic congested roadway intersections as a result of accumulating vehicle emissions. CO concentrations must be calculated for study intersections when an increase of traffic from the implementation of a proposed project causes an intersection to operate at level of service (LOS) D or worse. The proposed project is anticipated to increase vehicle trips to the project site by approximately 3,000 annually, or a minimal daily average of 15 vehicle trips. The proposed project would extend the daily operating hours into the ~~evening~~ later afternoon (5:30-4:00 PM). Although not anticipated, this analysis conservatively assumes that all 15 trips would occur during the PM peak hour commute. However, even if all 15 vehicle trips would use the same intersections within that peak hour, the minimal increase of 15 trips would not adversely impact the roadway’s level of service (refer to Section XVI [Transportation/Traffic] for further information regarding LOS calculations and impacts). Therefore, the proposed project would not result in an acute buildup of CO at roadway intersections (or other locations) on a daily basis.

The proposed project also includes the increase of special uses at the project site from two to ~~six~~ four annually. However, a CO hotspot is triggered only when roadway levels of service are degraded

such that vehicles become backed up, resulting in the accumulation of vehicle emissions. The characteristics of the proposed special uses (i.e., number of attendees, valet operations, etc.) would not change substantially from the two events that are held annually; therefore, the number of vehicles arriving at the site at any one time (or on any given day) would not increase. Further, attendees are anticipated to arrive at the site and deliver their vehicle to a valet who will park their cars immediately, which is consistent both with current conditions for the project site, as well as with the neighborhood, where large estate events are held regularly. Valet service would ensure that vehicles arriving at the site would not remain idling and would not contribute to a CO hotspot. As such, the addition of ~~four~~two events annually would not affect the potential for the proposed project to result in a CO hotspot. The proposed project would result in a *less-than-significant* impact with respect to localized CO concentrations.

“Environmental Analysis” Section III (Air Quality), page 56, “Toxic Air Contaminant Analysis” section, third paragraph

The proposed project includes the extension of daily operating hours and the increase of special events at the site by ~~four~~two (for a new total of ~~six~~four) annually. The proposed project is anticipated to result in approximately 15 additional daily trips in the project area, which would not result in the generation of any considerable TACs and, therefore, would not have the potential to impact nearby sensitive receptors. Conversely, the proposed project, as a park/botanical garden, is not specifically considered by the County or SCAQMD to be a sensitive receptor. Regardless, the proposed project is in a predominantly residential area and, therefore, is not located within 1,000 feet of any identified land use type identified as a potential TAC emitter. Further, the proposed project is not located within 500 feet of a high-volume roadway. Therefore, the project would result in a *less-than-significant* impact with respect to the generation of or proximity to TAC emissions.

“Environmental Analysis” Section IV (Biological Resources), page 59, last paragraph

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. Although the proposed project would increase the number of visitors per week (due to the additional days of operation) and the number of special uses, all precautions that are currently in place to protect the integrity of the structures and gardens would be retained and adhered to, such that the existing vegetation remains undisturbed. Common wildlife will continue to benefit from the habitat that the gardens provide, and the biological functions and values associated with the existing environment will be conserved and even enhanced with implementation of the proposed project. Therefore, the proposed project would not have the potential to adversely affect sensitive or special-status species, resulting in a *less-than-significant* impact.

“Environmental Analysis” Section IV (Biological Resources), page 61, third paragraph

The garden, arboretum, and associated trees at the project site could provide temporary dispersal and foraging habitat for migratory birds. However, the proposed project would not involve removal or disturbance of any trees, shrubs, or other vegetation on the project site that could be used by birds and other wildlife species. Therefore, no direct impacts or loss of habitat would occur as a result of project implementation. Further, the proposed project includes the maintenance and preservation of the gardens as a resource that could result in a beneficial impact to wildlife. Although the proposed project would

increase the number of visitors to the site on a weekly basis due to the addition of ~~one-two~~ operational days weekly, the visitor activities would not require encroachment into garden habitat and would continue to be non-invasive to the existing environment, avoiding indirect impacts. Therefore, implementation of the proposed project would not have an adverse affect on migratory birds and other wildlife species potentially moving through the area, resulting in a *less-than-significant* impact on migratory wildlife.

“Environmental Analysis” Section V (Cultural Resources), page 64, third full paragraph

The proposed project would expand hours of operation, increase the number of visitors at the site on a weekly basis (by adding ~~one-two~~ additional operational days weekly), revise the types of daily operational uses permitted on the property, and increase the number of special uses permitted at the site. The proposed project would not involve changes to the physical environment, such as alterations to the existing structures or gardens on the project site. The expanded operating hours and increased events would not impact the property and would be consistent with historical preservation objectives. Similarly, the proposed changes to public accessibility would not result in alterations to the site itself and no additional facilities would be constructed on site or in the vicinity that would negatively impact the property’s integrity of setting.

“Environmental Analysis” Section V (Cultural Resources), page 64, fourth full paragraph

Currently, operations at the project site focus on biology, botany, and horticulture with limited interpretation of the history of the property itself or its role in early development in Beverly Hills. ... In addition, this proposed change would support local historic preservation efforts in compliance with goals outlined in the County of ~~Beverly Hills~~ Los Angeles General Plan Policy C/NR 14.5, which serves to promote public awareness of the County’s historic, cultural, and paleontological resources. As the project site is owned by the County, actions are not subject to the requirements of the City of Beverly Hills. However, the proposed project is in accordance with the City of Beverly Hills General Plan Policy HC 2.1. This policy specifically states it intention to develop partnerships for public education on local historic resources with preservation groups such as The Friends of Robinson Gardens.

“Environmental Analysis” Section VI (Geology/Soils), page 68, last paragraph

The project site is located approximately 1 mile from the Santa Monica fault that bisects Beverly Hills. However, the Santa Monica fault has not been active during recorded history. Although an increased number of people would visit the project site on a weekly basis (due to the addition of ~~one-two~~ operational days weekly) and annual basis (due to the increased operational days ~~weekly~~ monthly and ~~four-two~~ special events) under the proposed project, visitors would not be further exposed to geologic hazards. It is expected that most of these visitors would come from Southern California would not experience an appreciable increase in risk ...

“Environmental Analysis” Section VI (Geology/Soils), page 73, third paragraph

However, no ground disturbance would occur under the proposed project that could trigger landslides and no new structures would be added to the property that could increase the exposure to landslides. Although an increased number of people would visit the project site on a weekly basis (due to the addition of ~~one-two~~ operational days weekly) and annual basis (due to the increased operational

days ~~weekly~~ monthly and ~~four~~ two special events) under the proposed project, the risk to each visitor due to landslides would not be increased by the proposed project. The existing exposure level would continue to each visitor. As such, implementation of the proposed project would not increase the landslide potential at the project site and would result in a *less-than-significant* impact related to exposure of people to landslides.

“Environmental Analysis” Section VI (Geology/Soils), page 74, first full paragraph

The proposed project would not be susceptible to liquefaction or lateral spreading. Subsidence can occur as a result of excessive groundwater or petroleum extractions, causing the ground surface to sink. As groundwater and/or petroleum extraction do not occur and are prohibited at the project site, the project site is not subject to subsidence or collapse. Although, as discussed above, a portion of the project site is vulnerable to landslides, the proposed project would not involve construction activities, modifications to the existing project site, or any changes to the physical environment. Therefore, the proposed project would not cause any geologic unit or soil to become unstable. Although the proposed project would increase the number of visitors at the project site on a weekly basis (due to the addition of ~~one~~ two operational days weekly) and annual basis (due to the increased operational days weekly ~~monthly~~ and ~~four~~ two special events), the risk to each visitor would not change from current conditions, which have not been identified as problematic. Therefore, the proposed project would have a *less-than-significant* impact related to landslide, lateral spreading, subsidence, liquefaction, or collapse.

“Environmental Analysis” Section VIII (Hazards/Hazardous Materials), page 77, first full paragraph

As with most residences and other facilities in the City of Beverly Hills, small consumer quantities of household cleaning and other hazardous materials in the City of Beverly Hills are routinely used, stored, and transported in commercial/retail businesses, educational facilities, hospitals, and households. The proposed project would expand the current operating hours (by up to 0.52 hours daily and ~~one~~ two additional days weekly), and, as a result, more visitors would be able to access the Virginia Robinson Gardens, a main objective of the County. Further, more visitors would have access to the site during the ~~four~~ two additional special events annually.

“Environmental Analysis” Section VIII (Hazards/Hazardous Materials), page 81, first partial paragraph

Elden Way is not a street that carries regional traffic that could serve as a major evacuation route.¹ Therefore, although traffic in the area would increase slightly as a result of the proposed project, this change would be minimal and would not impact local streets and emergency evacuation routes. In addition, the proposed project would not involve any changes to the on-site uses. Although more events would occur throughout the year (an increase of ~~four~~ two events), attendance at those events would be generally the same. The proposed project would also still only allow a maximum of 100 visitors per day for non-special-

¹ City of Beverly Hills, *City of Beverly Hills General Plan*, Circulation Element, Map CIR1 (Streets Carrying Regional Traffic), http://www.beverlyhills.org/services/planning_division/land_use_n_zoning/general_plan/genplan.asp (accessed June 26, 2012).

use events. Therefore, the proposed project would not interfere with an adopted emergency response plan or evacuation plan, resulting in a *less-than-significant* impact.

“Environmental Analysis” Section VIII (Hazards/Hazardous Materials), page 81, last paragraph

The project site is in the VHFHSZ and includes dense vegetation that could propagate a fire. However, Fire Station #2, located at 1100 Coldwater Canyon Drive, is approximately 0.5 mile from the project site and would respond in the case of a wildland fire. Further, the project site meets, and the proposed project would meet, all applicable regulations related to fire safety. Although the proposed project would increase the number of visitors to the site weekly (due to increased daily hours and ~~one~~two additional operational days weekly) and annually (due to ~~four~~two additional special events), the risk to each visitor due to wildland fires would not change as a result of the proposed project. 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 site at any given time. Therefore, the proposed project would have a *less-than-significant* impact due to the exposure of people to wildland fire hazards.

“Environmental Analysis” Section IX (Hydrology/Water Quality), page 85, third full paragraph

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 days weekly) and annually (due to the increase of ~~four~~two special events), the project would not result in a substantial water demand that would require MWD to obtain more water resources from groundwater sources (refer to Section XVII [Utilities/Service Systems] for further information regarding project-related water demand). Further, the proposed project would not change its existing land use to a use that would deplete groundwater sources. As such, the proposed project would result in a *less-than-significant* impact to the City’s groundwater supplies.

“Environmental Analysis” Section IX (Hydrology/Water Quality), page 86, first full paragraph

As discussed in Section IX(c), the project site is located approximately 0.75 mile east of Benedict Canyon Creek. However, the proposed project would not increase impervious surfaces or change existing conditions in a way that would create additional runoff. Further, the proposed project would not alter any aspect of drainage at the project site. There are existing storm drains along Eldien Way and other surrounding streets that serve the project site. The existing storm drains have sufficient capacity to serve the project site, and the proposed project would not increase the rate or amount of surface runoff in a manner that would result in any flooding, resulting in a *less-than-significant* impact.

“Environmental Analysis” Section IX (Hydrology/Water Quality), page 88, third full paragraph

The proposed project would not result in the construction of new structures but would increase the number of visitors to the site on a weekly basis (due to an increase in daily operating hours and the addition of ~~one~~two operational days weekly) and annually (due to the additional of ~~four~~two special events). Although the project site is located in an area that the City’s General Plan considers as susceptible to

potential flooding from the Lower Franklin Canyon Dam, the project site sits on the top of a hill. As such, in the highly unlikely event of dam failure, it is not expected that the project site would experience flooding. Further, the proposed project would not increase the exposure risk to individual visitors. Therefore, the proposed project would not expose people or structures to a significant loss, injury, or death involving flood due to failure of a dam, resulting in a *less-than-significant* impact.

“Environmental Analysis” Section XII (Noise), page 99, second paragraph

The proposed project would not involve construction activities of any kind and, therefore, would not result in short-term construction-related noise impacts. The proposed project would not result in an increase in the maximum number of visitors at the project site each day; therefore, the daily increase in noise levels from activity at the project site would not change. However, the number of days that the project would generate noise would increase (~~one-two~~ additional operational days weekly; ~~four-two~~ additional special events annually, some of which could occur in the evening hours, ~~annually~~). The primary operational component of the project site that increases noise is periodic traffic noise. Noise from tours typically consists of normal, human conversation levels. Noise from events typically consists of conversation and live, and potentially amplified, music until 10:00 PM, consistent with the City of Beverly Hills Noise Ordinance. These sources of operational noise are discussed below.

“Environmental Analysis” Section XII (Noise), page 100, first full paragraph

On public tour days, the site generates up to approximately 50 vehicle trips for both tours. Tours are currently offered four days per week, Tuesday through Friday. Under the proposed project, tours would be offered ~~five-six~~ days per week, ~~Tuesday~~ Monday through Saturday. Therefore, ~~one-two~~ additional days per week would experience an increase in traffic of 50 trips per day under the proposed project. Large events at the site generate up to 460 vehicle trips per event, assuming a maximum capacity of 700 guests. Two special uses are currently hosted at the site annually; under the proposed project, up to ~~six-four~~ special uses would occur annually. Therefore, ~~four-two~~ additional events/days per year would experience an increase in traffic of up to approximately 460 trips per day from special use traffic. Trips generated by site staff, volunteers, and the live-in caretaker are included in the traffic volumes without project operation. These trips are part of the ambient condition because they occur whether or not tours and special uses are hosted on the project site on a given day.

The conservative-scenario increase in traffic noise generated by the project site under existing conditions is provided in Table 6 (Existing Site-Generated Increases in Ambient Noise Levels [Year 2012]). As shown in Table 6, calculated noise levels from existing traffic range from 48 to 64 dBA CNEL. These noise levels are consistent with the measured ambient noise levels provided in Table 5, which range from 51 to 69 dBA and also include other sources of noise, including leaf blowers and helicopter flyovers. The conservative-scenario increase in traffic noise generated by the proposed project under future (Year 2014) conditions is provided in Table 7 (Future Site-Generated Increases in Ambient Noise Levels [Year 2014]).²² Similar to existing conditions, potential increases in noise level in Year 2014 would occur with or without implementation of the proposed project. Implementation of the proposed project would increase the frequency that the increase in daily traffic from site operation would occur.

²² Although changes proposed for the project site are anticipated to take effect by fall 2013, opening year conditions (future year) were analyzed using year 2014 volumes to yield the most conservative analysis. This assumes that it would take County staff at least a year to put together a full schedule of ~~six-four~~ proposed special events.

“Environmental Analysis” Section XII (Noise), pages 102 to 103, last paragraph

As shown in Table 6, public tour days do not result in an increase in ambient noise level on any roadway, with the exception of Elden Way. Tour-generated trips result in a conservative-scenario increase in noise level of 1 dBA CNEL on Elden Way. Generally, 1 to 2 dBA changes are not perceptible. Therefore, ~~one-two~~ additional tour days per week would not result in any detectable increase in ambient noise level compared to existing ambient noise levels. On days when special uses are held at the project site, the project site does not generate any increase in noise level on Benedict Canyon Drive, Lexington Road, or Beverly Drive, but does generate increases in noise level of 3 dBA CNEL and 5 dBA CNEL on North Crescent Drive and Elden Way, respectively, which are low-traffic residential streets that do not provide connection to the regional circulation network. In general, a 5 dBA change in community noise levels is noticeable, and a 3 dBA change is the smallest increment that is perceivable by most receivers. Therefore, the increase in noise level on event days may be noticeable; however, the per-event noise would not be different than on special use days that occur twice annually under current conditions. The proposed project would result in ~~four-two~~ additional days of special uses, when an increase in traffic noise would potentially be noticeable. However, roadway noise would not exceed 55 dBA and would not result in a significant increase in roadway noise on either North Crescent Drive or Elden Way. Additionally, the calculated noise levels of 50 dBA CNEL and 51 dBA CNEL are within the normally acceptable noise level range for single-family residences. Therefore, the increase in traffic noise as a result of operation of the project site would not result in the exposure of persons to or generation of noise levels in excess of applicable noise standards under the existing plus project scenario.

As shown in Table 7, public tour days would not result in an increase in ambient noise level on any roadway in Year 2014, with the exception of a 1 dBA CNEL increase in noise level on Elden Way. Similar to existing conditions, ~~one-two~~ additional tour days per week would not result in a detectable increase in ambient noise level compared to future ambient noise levels. On days when special uses are held at the project site, the project site would not generate any increase in noise level on Beverly Drive or Benedict Canyon Drive. A 1 dBA CNEL increase in noise level would occur on Lexington Road; however, this increase in noise level would generally not be perceptible. Similar to existing conditions, special uses would have the potential to generate an increase in noise levels up to 5 dBA CNEL on North Crescent Drive and Elden Way. Therefore, the increase in noise level on special use days may be noticeable. However, roadway noise would not exceed 55 dBA noise levels and would remain within the normally acceptable noise level range for single-family residences. Therefore, the increase in traffic noise as a result of operation of the project site would not result in the exposure of persons to or generation of noise levels in excess of applicable noise standards under the Year 2014 scenario.

“Environmental Analysis” Section XII (Noise), pages 103 to 104, last paragraph

Tours of the site do not generate noise levels beyond normal human conversation levels. The noise level for normal conversation is approximately 65 dBA at 3 feet (Caltrans 1998). Existing noise levels on the project site and along Cove Way, Elden Way, and Carolyn Way adjacent to the project site range from 51

to 55 dBA. Noise levels from normal conversation and would not exceed 50 dBA more than 20 feet from the source. Further, tours of the site would typically not reach the project-site boundaries along Carolyn Way based on the terraced topography at the east-northeast side of the property. ~~Parking may be provided for tour attendees in the future near the lower tennis court, off Cove Way.~~ However, conversational noise levels would not exceed 50 dBA at nearby residences based on the distance between this location and the residences. The only ~~tour~~-conversation that would take place near the Elden Way entrance to the site includes entrance to the site by call box, and a few patrons who might be interested in seeing the front of the Main Residence. This is typical of current conditions and conversational noise levels would not exceed the 50 dBA level at the two adjacent residences based on the spatial separation. Therefore, noise from tours is generally not audible off site over ambient noise levels and does not generate excessive noise levels at any nearby sensitive receptor. An increase in tour operations ~~from to 56~~ days per week from 4 days per week would not result in any exposure to an excessive noise source.

“Environmental Analysis” Section XII (Noise), page 104, third full paragraph

The great lawn is the only area on the project site capable of hosting sit-down events with live music that would concentrate guests in one location. Speech and music noise together generate noise levels up to 64 dBA at 100 feet. The nearest residences to the great lawn are located approximately 150 feet away on Elden Way and Carolyn Way. At this distance, events generate noise levels of up to 61 dBA. Therefore, typical event noise is audible over ambient noise levels. However, the tall, dense landscaping that surrounds the great lawn, as well as the Main Residence structure would help to deaden any sound bleeding onto nearby residences. Implementation of the proposed project would result in ~~four~~two additional events/days that residents may be exposed to special use noise. Typical special use noise levels would have the potential to exceed the maximum normally acceptable noise level of 60 dBA at the nearest residences. However, noise levels would not exceed the conditionally acceptable noise level of 70 dBA. This noise level limit is intended to protect residences from permanently noisy environments.

“Environmental Analysis” Section XII (Noise), page 105, first partial paragraph

acceptable noise level range for single-family residences, special uses would occur on only ~~four~~two additional events/days per year, and events would be subject to a discretionary Facility Use Permit, additional events at the project site would not result in the exposure of persons to or generation of noise levels in excess of applicable noise standards.

“Environmental Analysis” Section XII (Noise), page 105, second full paragraph

Street parking for public tours and special uses is currently prohibited. Under the proposed project, street parking would continue to be prohibited, ~~with the exception of guests who obtain a reservation in advance if parking cannot be made available on site due to vehicle size restrictions for visitors along Elden Way and a sign will be posted on the property indicating as much.~~ Noise sources from cars parked on public streets would potentially include car alarms, door slams, radios, and normal conversation. These sources are generally short-term and intermittent and would be scattered throughout the neighborhood on roadways that allow public parking. Public street parking is currently allowed in the project vicinity ~~and street parking for public tours and events at the project site would not generate any unusual noise sources that would~~

~~differ from existing street parking; however, the proposed project would not alter this as street parking on Elden Way by visitors would be prohibited.~~ It should be noted that on-street parking along Elden Way is unrestricted; this is the only stretch of roadway within the vicinity that provides for unrestricted parking. For example, on-street parking along Lexington Road, N Crescent Drive, Cove Way, and Oxford Way is limited to 2-hour parking from 8:00 AM to 6:00 PM. As such, Elden Way is heavily utilized by construction and landscaping personnel for the estates in the larger vicinity (i.e., north of Sunset Boulevard) for daily long-term, unrestricted parking. Accordingly, even if on-street parking were allowed on Elden Way for patrons of Virginia Robinson Gardens, it is incredibly difficult to find an open parking space during daytime hours along Elden Way. ~~As such, noise levels from an infrequent tour attendee parking on Elden Way would register a greater noise level. Additionally, noises would be different from each other in kind, duration, and location based on tour, class, seminar, etc, so that the overall effects would be separate and in most cases would not affect noise sensitive receptors at the same time. However, as parking for visitors would be prohibited along Elden Way, the proposed project would not alter the existing noise environment due to on-street parking.~~ Therefore, noise generated from street parking would not result in exposure to an excessive noise source.

“Environmental Analysis” Section XII (Noise), page 106, first partial paragraph

... and silent auctions would generally not be perceptible over existing conditions. Noise from sit-down events with live music and guests concentrated in one location would have the potential to result in noticeable increase in noise levels over ambient conditions. However, these noise levels would be within the conditionally acceptable noise ranges for residential land use and would be subject to a Facility Use Permit, granted by the property Superintendent. Therefore, additional events at the project site would not result in the exposure of persons to or generation of noise levels in excess of applicable noise standards. ~~Additionally, occasional street parking would not generate excessive noise.~~ This impact would be *less than significant*.

“Environmental Analysis” Section XII (Noise), page 106, second full paragraph

The proposed project would not result in a permanent increase in ambient noise levels in the project area. Under the proposed project, the project site would be open to the public ~~two~~ a maximum of 0.5 additional hours per day and ~~one~~ two additional days per week annually. As stated above, this intensity of use would increase traffic noise in the area but would not exceed the thresholds as outlined by the City’s General Plan. In addition, the daily on-site noise as a result of public tours, special-use tours, classes, and silent auctions would generally not be perceptible over existing conditions. Special events would occur periodically, no more than ~~six~~ four times per year, but would not contribute to a permanent noise increase in the vicinity. Noise associated with the operation of the proposed project would increase but would be within acceptable levels, would be periodic, and would not be excessive. This impact would be *less than significant*.

“Environmental Analysis” Section XII (Noise), page 107, first partial paragraph

... the project site would not result in a substantial increase in operational noise levels. Special events would occur sporadically, ~~six~~ four times per year, but would be within the conditionally acceptable noise ranges

for residential land use and would be subject to a Facility Use Permit, granted by the property Superintendent. The proposed project would have a *less-than-significant* impact related to periodic increases in ambient noise levels.

“Environmental Analysis” Section XIII (Population/Housing), page 108, third paragraph

The proposed project would modify the existing operating schedule for the Virginia Robinson Gardens but would not increase the number of volunteers/employees at the project site. The hours of operation for the project site would be increased by ~~two~~ a maximum of 0.5 hours per day and ~~extended an two~~ additional days each week (open to the public ~~five~~ six days per week compared to four). The number of allowable visitors per day would remain the same (100 visitors per day); however, the restrictions as to their activities on site would be relieved. As such, the proposed project would not increase the number of daily visitors but would increase the number of visitors at the project site on a weekly basis.

Similarly, the number of attendees at special uses would not increase above the approximately 700 that occurs currently, but the number of special uses would increase on site from two to ~~six~~ four annually under the proposed project. ...

“Environmental Analysis” Section XIV (Public Services), page 110, second paragraph

Generally, impacts associated with the provision of fire protection services would occur if a project would result in an increase in demand for fire protection services to the extent that construction of new or expanded fire department facilities is required to maintain existing service levels. Typically, an increase in demand for fire services is associated with a substantial increase in population in a service area or development of a previously undisturbed area requiring entirely new fire services. As described under Section IV (Population/Housing), the proposed project would not result in substantial population growth in the project area. Further, the number of people visiting the site on a daily basis (100 visitors) would not change from existing conditions; rather, the number of days that number of people would be allowed on site would increase by ~~one~~ two (from 4 to ~~5~~ 6 days per week). Additionally, the number of special uses on the site would increase from two to ~~six~~ four annually; however, the number of per-event attendees would not change substantially from current conditions. The increase in visitors at the project site would be minor, intermittent, and not permanent and would not adversely affect existing service levels. As such, the proposed project would not result in a substantial increase in demand for fire protection services and would not necessitate construction of new or expansion of existing facilities.

“Environmental Analysis” Section XIV (Public Services), page 111, second paragraph

Generally, impacts associated with police protection services would occur if a project would result in an increase in demand for police protection services to the extent that construction of new or expanded facilities is required to maintain existing service levels. Typically, an increase in demand for police protection services is associated with a substantial increase in population in the service area or development of a previously undisturbed area requiring entirely new fire services. As described under Section IV, the proposed project would not result in substantial population growth in the project area. Further, the number of people visiting the site on a daily basis (100 visitors) would not change from existing conditions; rather, the number of days that number of people would be allowed on site would increase by ~~one~~ two (from 4

to ~~56~~ days per week). Additionally, the number of special uses on the site would increase from two to ~~six-four~~ annually; however, the number of per-event attendees would not change substantially from current conditions. The increase in visitors at the project site would be minor, intermittent, and not permanent and would not adversely affect existing service levels. As such, the proposed project would not result in a substantial increase in demand for police protection services that would necessitate construction of new or expansion of existing facilities. The BHPD would have sufficient capacity to accommodate the increase in visitor population associated with the proposed project.² Therefore, the proposed project would have a *less-than-significant* impact on the provision of police protection services in the project vicinity.

“Environmental Analysis” Section XV (Recreation), page 113, last paragraph

One of the primary objectives of the proposed project is to increase the availability of the Virginia Robinson Gardens to the general public by expanding the hours of operation, increasing the allowable themes for classes and seminars, and adding ~~four-two~~ additional special events annually. As such, the proposed project would increase the public availability and use of the project site, including the botanical gardens and grounds. The increase in public availability resulting from the proposed project would remain within the original intent and boundaries set forth by the Robinson Will. However, visitors would be subject to the same restrictions that are currently in place for the purpose of protecting the integrity of the project site. As such, the proposed project would not result in the deterioration of the project site and would not contribute to the deterioration of other parks and recreational facilities in the project vicinity. In addition, the proposed project would not include construction of recreational facilities. Therefore, the proposed project would have *no impact* on recreation.

**“Environmental Analysis” Section XVI (Transportation/Traffic), page 114,
“Transportation/Traffic” heading, first impact selection box**

	Potentially Significant Impact	Less Than Significant w/Mitigation Incorporated	Less-Than-Significant Impact	No Impact
Would the project:				
(a) Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and nonmotorized travel and relevant components of the circulation system, including, but not limited to, intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

“Environmental Analysis” Section XVI (Transportation/Traffic), page 118, “Approach to Analysis” section, after second full paragraph

In addition to these intersection thresholds, the City of Beverly Hills also maintains thresholds pertaining to impacts on residential or Local streets. These thresholds are based on the existing average daily trips (ADT) and the proposed increase in ADT, by percentage, anticipated from a project. Based on the current ADT along Elden Way, the relevant threshold relates to a roadway with ADT less than 2,000 volume per

² Gregg Mader, Email communication with Sergeant, Beverly Hills Police Department (July 16, 2012).

day (vpd) and a significant impact would result if the project increases ADT by 16 percent, or increases peak hour [trips] by 16 percent, or both.

“Environmental Analysis” Section XVI (Transportation/Traffic), page 119, “Trip Generation” section, first paragraph

Under existing conditions, the project site generates approximately 40 total vehicle trips per day and approximately 25 round trips per day, which translates to a total of 50 vehicle trips per day. The proposed project would extend operating hours by a maximum of 0.52 hours per operating day (until ~~5:30~~4:00 PM daily); extend the weekly operation from four days per week to ~~five-six~~ (Tuesday-Monday to Saturday); and allow for an additional ~~four-two~~ special events per year. The proposed project is not projected to result in additional vehicle trips during weekdays, but it would shift the departure time of trips from the project site.

Currently, operation of the project site adds no trips during the analysis peak hour since the visiting hours end at 3:30 PM. Extending the project site hours-of-operation to ~~5:30~~4:00 PM ~~would~~ add approximately 10 trips to the PM peak hour (assuming a worst-case scenario), which extends from 4:45 to 5:45 PM. However, this is a conservative estimate since the peak hour starts well after the closure time of the project site and these trips reflect potential employee or other residual visitor trips. The proposed increase in special events that would be held throughout the year would occur during non-peak hours and will be accompanied by valet parking which would negate any impacts to intersection operations or impacts due to parking issues for these events.

“Environmental Analysis” Section XVI (Transportation/Traffic), page 120, “Existing plus Project Conditions” section, after last paragraph

Similarly to the intersection analysis, project-related traffic was added to existing conditions volumes along Elden Way to determine the potential for impact on Local streets. As the proposed project will not change operations substantially during weekdays, the increase in traffic volumes along Elden Way during weekday operation would not be substantial and would not result in an increase that would exceed the City’s Local street threshold. However, based on the current ADT of approximately 200 along Elden Way, the additional project trips of approximately 160 on Saturdays would result in an increase greater than the City’s threshold of 16 percent, resulting in a significant impact, by percentage. However, this impact would not create an operational impact along Elden Way or the surrounding intersections, as noted above.

In order to reduce this potential impact, project-related trip volumes on Saturdays would have to be reduced below 40 ADT, which would be impractical, operationally infeasible, and would preclude the proposed project from meeting the identified Project Objectives. As such, an analysis of off-site parking opportunities was completed to address the feasibility of reducing the number vehicular trips to the project site on Saturday below 40 to conform to the City’s Local street threshold (Appendix G). This analysis included an in-depth study of the potential use of five local parking alternatives including Greystone Mansion and Park, the Beverly Hills Women’s Club, City of Beverly Hills parking structures (two), and the use of the Cove Way parking area. In summary, this analysis determined that the use of off-site parking opportunities was not feasible.

“Environmental Analysis” Section XVI (Transportation/Traffic), page 122, “Opening Year (2014) plus Project Conditions” section, after last paragraph

Similarly to the intersection analysis, project-related traffic was added to Opening Year condition volumes along Elden Way to determine the potential for impact on Local streets. As the proposed project will not change operations substantially during weekdays, the increase in traffic volumes along Elden Way during weekday operation would not be substantial and would not result in an increase that would exceed the City’s Local street threshold. However, based on the anticipated Opening Year ADT along Elden Way, the additional project trips of approximately 160 on Saturdays would result in an increase greater than the City’s threshold of 16 percent, resulting in a significant impact, by percentage. However, this impact would not create an operational impact along Elden Way or the surrounding intersections, as noted above.

In order to reduce this potential impact, project-related trip volumes on Saturdays would have to be reduced below 40 ADT, which would be impractical, operationally infeasible, and would preclude the proposed project from meeting the identified Project Objectives. As such, an analysis of off-site parking opportunities was completed to address the feasibility of reducing the number vehicular trips to the project site on Saturday below 40 to conform to the City’s Local street threshold (Appendix G). This analysis included an in-depth study of the potential use of five local parking alternatives including Greystone Mansion and Park, the Beverly Hills Women’s Club, City of Beverly Hills parking structures (two), and the use of the Cove Way parking area. In summary, this analysis determined that the use of off-site parking opportunities was not feasible.

“Environmental Analysis” Section XVI (Transportation/Traffic), page 125, “Conclusion” section

Implementation of the proposed project (under current and future conditions) would not degrade LOS at any of the six study intersections below the thresholds established by the City of Beverly Hills. However, the proposed project would result in an increase of vehicle trips to the project site on Saturdays that would exceed the Local street threshold established by the City of Beverly Hills (an impact would occur only on Saturday). As noted in the impact discussion and in Appendix G, in order to reduce this potential impact, project-related trip volumes on Saturdays would have to be reduced below 40 ADT, which would be impractical, operationally infeasible, and would preclude the proposed project from meeting the identified Project Objectives. An analysis of five off-site parking opportunities was prepared to address the feasibility of reducing the number vehicular trips to the project site on Saturday below 40 to conform to the City’s Local street threshold. In summary, this analysis determined that the use of off-site parking opportunities was not feasible. As such, the proposed project would result in a significant and unavoidable impact due to the exceedance of the City of Beverly Hill’s Local Street threshold. It should be noted that this impact would not create an operational impact along Elden Way or the surrounding intersections.

Therefore, in accordance with the City’s Traffic Impact Analysis Guidelines, the proposed project would result in a ***less-than-significant*** impact to traffic conditions and intersection functionality and a ***significant*** impact due to the exceedance of the City of Beverly Hills Local Street threshold.

“Environmental Analysis” Section XVI (Transportation/Traffic), page 126, last paragraph

The project site is most conveniently accessed by single occupancy vehicle. Currently, visitors are not allowed to arrive at the site on foot or by taxi, and parking on surrounding roadways is prohibited. Under the proposed project, access by multiple modes of transportation would be increased: visitors would be allowed to arrive at the site on foot, having arrived to the neighborhood via public transit, and via taxi; ~~and, and with advanced reservations, although generally visitor parking would be prohibited on surrounding streets, parking of a vehicle that would not otherwise fit on site would be allowed on Elden Way.~~

“Environmental Analysis” Section XVII (Utilities/Service Systems), page 127, third paragraph

The proposed project would modify the operating schedule of the project site by increasing daily operating hours and extending days of operation to ~~five~~ six days per week. However, the number of daily visitors would remain the same as existing (100 people per day). Additionally, the proposed project would allow for an increase of ~~four~~ two “special events” per year. For special uses, visitors utilize restroom facilities on site and VIP portable facilities are arranged for the facility. As such, special uses do not generate a substantial increase in wastewater discharge as much of the services are portable and brought to the site (including water, electricity, and sewage provided by the VIP portable facilities). The increase in operating hours and visitation described above would result in an increase in wastewater discharged from the project site. The increase in wastewater discharge would primarily be caused by additional use of bathroom facilities at the project site over existing conditions. However, the increase in wastewater due to the proposed project would generally be minor.

“Environmental Analysis” Section XVII (Utilities/Service Systems), page 128, first paragraph

However, as discussed below in Section XVII(d), the proposed project would result in an increase in water annually of ~~28,160~~ 41,536 gallons. Assuming an industry standard that the wastewater discharge from a property equals 110 percent of the water demand, the proposed project would result in an increase in wastewater discharge of approximately ~~30,976~~ 45,690 gallons annually. It is important to note that this is a conservative estimate provided to illustrate the worst-case scenario. According to the City of Los Angeles Bureau of Sanitation, the proposed project would not exceed the wastewater limits of the HTP and could be accommodated within existing local infrastructure.³ Therefore, the plant would be able to adequately treat project-generated sewage in addition to existing sewage, and the treatment requirements of the RWQCB would not be exceeded. Therefore, the proposed project would have a *less-than-significant* impact related to wastewater treatment requirements and available capacity at the Hyperion Treatment Plant.

³ Ali Poosti, Written communication from Division Manager, Wastewater Engineering Services Division, City of Los Angeles Bureau of Sanitation, Re: Virginia Robinson Garden – Request for Wastewater Service Information (August 20, 2012).

“Environmental Analysis” Section XVII (Utilities/Service Systems), page 128, second paragraph

As discussed in Sections XVII(a) and (d), the proposed project would result in an increase of approximately ~~30,976~~45,690 gallons of wastewater and ~~28,160~~41,536 gallons of water (demand) annually. These increases would be accommodated within existing entitlements and infrastructure and would not require the expansion of treatment facilities that could cause significant environmental impacts. As such, the proposed project would result in a *less-than-significant* impact due to the necessity to build new or additional facilities.

“Environmental Analysis” Section XVII (Utilities/Service Systems), page 129, second paragraph

Based on utility information provided by the Los Angeles County Parks, for the 2011/12 fiscal year, water usage for both indoor and outdoor facilities at the project site was 634,000 cubic feet (or an average of 0.013 million gallons per day [mgd]). However, the majority of water use at the project site is for irrigation purposes, as there is only one full-time resident (a grounds keeper) and a maximum of eleven staff or volunteers at the project site daily. The proposed project would not change the amount of landscaped area at the project site and, therefore, would have no effect on irrigation water demand. The proposed project would result in a minor and intermittent increase in visitors at the project site due to the addition of ~~2-0.5~~ hours per operational day, ~~one-two~~ additional operational days weekly (Monday through Saturday), and ~~four-two~~ additional special use events annually. Additional visitors would cause an incremental increase in demand for water while at the project site primarily associated with bathroom 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 uses do not generate a substantial increase in water demand as much of the services are portable and brought to the 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 ~~400~~200 additional people per week (~~5,200~~10,400 visitors annually) and 700 additional visitors per ~~four-two~~ additional special uses (~~2,800~~1,400 visitors annually). This would result in an increase in water demand of approximately ~~28,160~~41,436 gallons annually.³²

³² *US Energy Policy Act, 1994 Plumbing Code* (requiring 1.6 GPF); and Vickers, *Handbook of Water Use and Conservation* (2001) (frequency of uses by sex). Assumes 60% women and 40% men; Women use toilet 3 times per each male use. [~~5,200~~10,400 visitors (annually for the additional operational day) x 0.4 men x 1.6 gallons per flush] + [~~5,200~~10,400 visitors (annually for the additional operational day) x 0.6 (for women) x 3 flushes per day x 1.6 gallons per flush] + [~~2,800~~1,400 visitors (annually for special events) x 0.4 men x 1.6 gallons per flush] + [~~2,800~~1,400 visitors (annually for special events) x 0.6 women x 3 flushes per day x 1.6 gallons per flush].

“Environmental Analysis” Section XVII (Utilities/Service Systems), page 131, Table 15

Table 15		Solid Waste Generation	
Activity	Generation Rate	Existing (lbs/yr) ^a	Proposed Project (lbs/yr) ^b
Daily Operations (Public Tours and Classes/Seminars)	0.09 ton/acre/yr or 0.493 lb/acre/day	636	795 <u>954</u>
Special Events	120 lbs/event	240	720 <u>480</u>
<i>Total</i>	—	<i>876</i>	1,515 <u>1,434</u>

SOURCE: CalEEMod; Atkins, *San Diego Marriot Marquis and Marina Facilities Improvement and Port Master Plan Amendment Project Draft EIR* (2011).

- Assumes conservative estimate of 208 operating days (Tuesday–Friday, 52 weeks per year).
- Assumes conservative estimate of ~~260~~312 operating days (~~Tuesday~~Monday–Saturday, 52 weeks per year), to include holidays with the exception of Thanksgiving, Christmas Day, and New Years Day.

“Environmental Analysis” Section XVII (Utilities/Service Systems), page 132, first paragraph

The proposed project would result in an increase of approximately ~~639~~558 pounds of solid waste per year. Given the City’s diversion rate of 57 percent, the proposed project would generate a total approximately ~~864~~817 pounds of solid waste annually, which would be accommodated by the available capacity at nearby landfills, identified in Table 14.

“Environmental Analysis” Section XVII (Utilities/Service Systems), page 133, second paragraph

The proposed project would not result in new development or a change in existing land use at the project site. Although the proposed project would result in a minor increase in public access to the project site, use of the project site is not energy intensive. Based on utility information provided by the Los Angeles County Department of Parks and Recreation, the project site used approximately 42,190 kilowatt hours (kWh) during the 2011/2012 fiscal year. As described under Sections VIII(f) and (g), the proposed project would result in an approximate ~~25~~50 percent increase in operating days at the project site. Therefore, the proposed project would result in an approximate ~~25~~50 percent increase in energy use over existing conditions. Project-related electricity demand would be approximately ~~52,737~~563,285 kWh per year, representing a net increase of ~~40,547~~521,095 kWh per year. A similar increase in natural gas demand would result from implementation of the proposed project; project-related natural gas demand would be approximately ~~483,000~~579,600 cubic feet per year (or ~~4,830~~5,796 therms per year), representing a net increase of approximately ~~96,600~~193,200 cubic feet per year (~~966~~1,932 therms per year).

When compared with energy demand at the county level (the County of Los Angeles is within the Southern California Edison service area) the net increase in electricity associated with the proposed project would represent approximately ~~0.000015~~0.00094 percent of the total 67,323 million kWh used by the County.³⁹ This would be a negligible increase in electricity demand. Similarly, the increase in natural gas demand associated with the proposed project would represent approximately 0.00003 percent of the County’s total natural gas usage in 2010. This would also be a negligible increase in natural gas demand.⁴⁰

APPENDIX CHANGES

Appendix C (Historic Resources Memorandum), page 1, first paragraph

In compliance with the requirements of the California Environmental Quality Act (CEQA) as it applies to historic resources, a professional historian meeting the Secretary of the Interior (SOI) Standards for History and Architectural History evaluated potential effects to the National Register of Historic Places (NRHP)-listed Virginia Robinson Gardens in Beverly Hills, Los Angeles County, California from proposed administrative changes by the property's owner (Figures 1–4). The property is currently operated by the County ~~Arboretum~~ of Los Angeles Department of Parks and Recreation, and along with its national designation, is also a California Point of Historical Interest (McAvoy and Heumann 1986). Additionally, though the city of Beverly Hills does not currently maintain a local register of historic resources, the resource is identified as a significant property in the city's General Plan (City of Beverly Hills 2010). Because the proposed project does not involve any construction, demolition, or landscape modifications, the area of potential effects (APE) for the purposes of this evaluation were limited to the current property boundaries (see Figure 5).

Appendix F (Traffic Impact Analysis)

Appendix F (Traffic Impact Analysis) has been revised throughout, so it is included, as revised, in its entirety at the end of this Final SEIR.

Appendix G (Virginia Robinson Gardens Infeasibility Analysis of Traffic Mitigation Memo)

Appendix G (Virginia Robinson Gardens Infeasibility Analysis of Traffic Mitigation Memo) was added as a new appendix so it is included in its entirety at the end of this Final SEIR.

RESPONSES TO COMMENTS ON THE DRAFT SUPPLEMENTAL EIR

ORGANIZATION OF THE RESPONSES TO COMMENTS

This chapter of the Final SEIR contains all comments received on the Draft SEIR during the public review period, as well as responses to each of these comments. Reasoned, factual responses have been provided to all comments received, with a particular emphasis on significant environmental and CEQA-related issues. Detailed responses have been provided where a comment raises a specific issue; however, a general response has been provided where the comment is relatively general. Although some letters may raise legal or planning issues, these issues do not always constitute significant environmental issues or issues as defined by CEQA. Therefore, the comment has been noted, but no response has been provided. Generally, the responses to comments provide explanation or amplification of information contained in the Draft SEIR.

In total, 35 comment letters regarding the Draft SEIR were received from one state agency, one local agency, and 33 private individuals. Table 2 (Comment Letters Received during the Draft SEIR Public Review Period) provides a comprehensive list of comment letters in the order that they are presented in this section.

Table 2 Comment Letters Received during the Draft SEIR Public Review Period					
No.	Commenter/Organization	Letter Code	Letter Date	Page Where Comment Begins	Page Where Response Begins
STATE AGENCY					
1	Native American Heritage Commission	NAH	10/5/2012	129	134
LOCAL AGENCY					
2	City of Beverly Hills	BEV	10/11/12	135	141
INDIVIDUALS					
3	Charles Alpert	ALP	10/8/2012	144	148
4	Nancy Blumenfeld	BLU	9/27/2012	160	160
5	Ellisa Bregman	BRE	9/22/2012	161	161
6	Alan Buster	BUS	9/26/2012	162	162
7	Marion Buxton	BUX	9/19/2012	163	163
8	Angela Cohan	COH	9/27/2012	164	164
9	Cynthia Comsky	COM	10/4/2012	165	165
10	Mary deKernion	DEK	9/26/2012	166	166
11	Claudia Deutsch	DEU	10/5/2012	167	167
12	Cynthia Fields	FIE	9/19/2012	168	168
13	Teri Fox-Stayner	FOX	9/18/2012	168	169
14	Barbara Fries	FRI	9/19/2012	169	169
15	Suzanne Gilbert	GIL	9/28/2012	170	170
16	Dorothy Kamins	KAM	9/27/2012	171	171

Table 2 Comment Letters Received during the Draft SEIR Public Review Period

No.	Commenter/Organization	Letter Code	Letter Date	Page Where Comment Begins	Page Where Response Begins
17	Iris and Dick Kite	KIT	10/10/2012	172	172
18	Julia Klein	KLE	9/26/2012	173	173
19	Suz Landay	LAN	9/26/2012	174	175
20	Thelma Levin	LEV	9/14/2012	175	175
21	Kathleen Luckard	LUC	9/18/2012	176	176
22	Mike Mc Alister	MCA	10/12/2012	177	177
23	Worthy McCartney	MCC	9/26/2012	178	178
24	Nancy Miller	MIL	9/28/2012	179	180
25	Carol Morava	MOR	9/24/2012	180	180
26	Tania Norris	NOR	9/18/2012	181	181
27	Donald Philipp	PHI	10/8/2012	182	184
28	Susan Rifkin	RIF	10/8/2012	186	186
29	Greer Saunders	SAU	10/7/2012	187	187
30	Debra Shaw	SHA	10/7/2012	188	189
31	Charles Tellalian	TEL	9/28/2012	189	190
32	Leslie Tillmann	TIL1	10/6/2012	191	192
33	Rolf Tillmann	TIL2	9/26/2012	192	192
34	Jamie Wolf	WOL	9/25/2012	193	194
35	Tony Yakimowich	YAK	10/10/2012	194	195


COMMENTS AND RESPONSES ON THE DRAFT SEIR

This section contains the original comment letters, which have been bracketed to isolate the individual comments, each followed by responses to the individual, bracketed comments within that letter. As noted above, and stated in CEQA Guidelines Sections 15088(a) and 15088(b), comments that raise significant environmental issues are provided with responses. Comments that are outside of the scope of CEQA review do not merit a response, but are included within this Final SEIR and will be considered by the County of Los Angeles Board of Supervisors prior to taking action on this Final SEIR and the proposed project. In some cases, a response may refer the reader to a previous response, if that previous response substantively addressed the same issues.

State Agency

Native American Heritage Commission (NAHC), 10/5/2012

Comments

<p>STATE OF CALIFORNIA</p> <hr/> <p>NATIVE AMERICAN HERITAGE COMMISSION 915 CAPITOL MALL, ROOM 364 SACRAMENTO, CA 95814 (916) 653-6251 Fax (916) 657-5390 Web Site www.nahc.ca.gov da_nahc@pacbell.net</p>	<p>Edmund G. Brown, Jr., Governor</p> <p>NAHC</p>  <p>RECEIVED OCT 11 2012 AM 8:51 PLANNING DIVISION</p>
<p>October 5, 2012</p>	
<p>Ms. Joan Rupert, Section Head Environmental and Regulatory Permitting County of Los Angeles Department of Parks and Recreation 510 South Vermont Avenue, Room 201 Los Angeles, CA 90020</p>	
<p>Re: <u>SCH#2012091034; CEQA Notice of Completion; draft Supplemental Environmental Impact Report (DSEIR); for the "Proposed Operational Changes to the Virginia Robinson Gardens Project;" located in the Hollywood area; Los Angeles County, California</u></p>	
<p>Dear Ms. Rupert:</p> <p>The Native American Heritage Commission (NAHC) is the State of California 'Trustee Agency' for the protection and preservation of Native American cultural resources pursuant to California Public Resources Code §21070 and affirmed by the Third Appellate Court in the case of EPIC v. Johnson (1985: 170 Cal App. 3rd 604).</p> <p>This letter includes state and federal statutes relating to Native American historic properties or resources of religious and cultural significance to American Indian tribes and interested Native American individuals as 'consulting parties' under both state and federal law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9. This project is also subject to California Government Code Section 65352.3.</p> <p>The California Environmental Quality Act (CEQA – CA Public Resources Code 21000-21177, amendments effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the CEQA Guidelines defines a significant impact on the environment as 'a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance.' In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect. The NAHC recommends that the lead agency request that the NAHC do a Sacred Lands File search as part of the careful planning for the proposed project.</p> <p>The NAHC "Sacred Sites," as defined by the Native American Heritage Commission and the California Legislature in California Public Resources Code §§5097.94(a) and 5097.96. Items in the NAHC Sacred Lands Inventory are confidential and exempt from the Public Records Act pursuant to California Government Code §6254 (r).</p>	

NAHC-1

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway. Culturally affiliated tribes and individuals may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We strongly urge that you make contact with the list of Native American Contacts on the attached list of Native American contacts, to see if your proposed project might impact Native American cultural resources and to obtain their recommendations concerning the proposed project. Pursuant to CA Public Resources Code § 5097.95, the NAHC requests cooperation from other public agencies in order that the Native American consulting parties be provided pertinent project information. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e). Pursuant to CA Public Resources Code §5097.95, the NAHC requests that pertinent project information be provided consulting tribal parties, including archaeological studies. The NAHC recommends *avoidance* as defined by CEQA Guidelines §15370(a) to pursuing a project that would damage or destroy Native American cultural resources and California Public Resources Code Section 21083.2 (Archaeological Resources) that requires documentation, data recovery of cultural resources, construction to avoid sites and the possible use of covenant easements to protect sites.

Furthermore, the NAHC if the proposed project is under the jurisdiction of the statutes and regulations of the National Environmental Policy Act (e.g. NEPA; 42 U.S.C. 4321-43351). Consultation with tribes and interested Native American consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 *et seq.*), 36 CFR Part 800.3 (f) (2) & .5, the President's Council on Environmental Quality (CSQ, 42 U.S.C 4371 *et seq.* and NAGPRA (25 U.S.C. 3001-3013) as appropriate. The 1992 *Secretary of the Interiors Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation. The aforementioned Secretary of the Interior's *Standards* include recommendations for all 'lead agencies' to consider the historic context of proposed projects and to "research" the cultural landscape that might include the 'area of potential effect.'

Confidentiality of "historic properties of religious and cultural significance" should also be considered as protected by California Government Code §6254(r) and may also be protected under Section 304 of he NHPA or at the Secretary of the Interior discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C., 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APEs and possibility threatened by proposed project activity.

Furthermore, Public Resources Code Section 5097.98, California Government Code §27491 and Health & Safety Code Section 7050.5 provide for provisions for inadvertent discovery of human remains mandate the processes to be followed in the event of a discovery of human remains in a project location other than a 'dedicated cemetery'.

To be effective, consultation on specific projects must be the result of an ongoing relationship between Native American tribes and lead agencies, project proponents and their contractors, in the opinion of the NAHC. Regarding tribal consultation, a relationship built around regular meetings and informal involvement with local tribes will lead to more qualitative consultation tribal input on specific projects.



NAHC-1
Cont.

Finally, when Native American cultural sites and/or Native American burial sites are prevalent within the project site, the NAHC recommends 'avoidance' of the site as referenced by CEQA Guidelines Section 15370(a).


If you have any questions about this response to your request, please do not hesitate to contact me at (916) 653-6251.

Sincerely,

Dave Singleton
Program Analyst

Cc: State Clearinghouse

Attachment: Native American Contact List



NAHC-1
Cont.

**Native American Contacts
Los Angeles County
October 5, 2012**

LA City/County Native American Indian Comm
Ron Andrade, Director
3175 West 6th St, Rm. 403
Los Angeles , CA 90020
randrade@css.lacounty.gov
(213) 351-5324
(213) 386-3995 FAX

Gabrielino Tongva Nation
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(909) 262-9351 - cell

Ti'At Society/Inter-Tribal Council of Pimu
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(310) 428-5690 - cell
(310) 587-0170 - FAX
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Gabrieleno/Tongva San Gabriel Band of Mission
Anthony Morales, Chairperson
PO Box 693 Gabrielino Tongva
San Gabriel , CA 91778
GTTribalcouncil@aol.com
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(626) 286-1758 - Home
(626) 286-1262 -FAX

Gabrielino-Tongva Tribe
Linda Candelaria, Chairwoman
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Los Angeles , CA 90067
lcandelaria1@gabrielinoTribe.org
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(310) 587-0170 - FAX

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SSCH#2012091034; CEQA Notice of Completion; draft Supplemental Environmental Impact Report (DSEIR); for the Proposed Changes to the Virginia Robinson Gardens Project; located in Los Angeles County, California.

**Native American Contacts
Los Angeles County
October 5, 2012**

Gabrieleno Band of Mission Indians
Andrew Salas, Chairperson
P.O. Box 393 Gabrielino
Covina CA 91723
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gabrielenoindians@yahoo.
com

This list is current only as of the date of this document.

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This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SSCH#2012091034; CEQA Notice of Completion; draft Supplemental Environmental Impact Report (DSEIR); for the Proposed Changes to the Virginia Robinson Gardens Project; located in Los Angeles County, California.

Responses to Native American Heritage Commission (NAH), 10/5/2012

NAH-1 This comment provides introductory or general information regarding the role of the Native American Heritage Commission, applicable CEQA statutes, as well as other policies and requirements, and encourages consultation with Native American Tribes in the area.

The comment further details the requirements of CEQA, identifying [paraphrasing] that if a project causes a substantial adverse change in the significance of an historical resource including archaeological or paleontological resources, an EIR must be prepared. Additionally, an adverse impact is identified; the NAHC recommends that the Lead Agency request that the NAHC prepare a Sacred Lands File search for the project under consideration. As discussed in Section V (Cultural Resources) of the Draft SEIR, beginning on page 63, the proposed project site was placed on the National Register of Historic Places (NRHP) on November 15, 1978, and is registered as a California Point of Historical Interest under the California Register of Historic Resources (CRHR), with the notation that access is restricted. The property is listed under NRHP Criterion C for Architecture and under Criterion A for Exploration/Settlement at the local level of significance. The nomination specifically states that one of the most significant characteristics of the property is the carefully designed landscape that integrates the Main Residence, Pool Pavilion, and garden. Further, the SEIR identifies that the City of Beverly Hills compiled a Historic Resource Inventory in 1986 which has not been adopted by the City as a local register, but it serves as a guide to potentially significant historic properties that may have historic or cultural significance to the City.


In compliance with the requirements of CEQA as it applies to historic resources, a professional historian meeting the Secretary of the Interior (SOI) Standards for History and Architectural History evaluated potential effects of the proposed project on the NRHP-listed Virginia Robinson Gardens. The results of this evaluation are included as Appendix C of this document. Since the proposed project would not involve any construction, demolition, or landscape modifications, the area of potential effects (APE) was limited to the current property boundaries. Under the proposed project, no physical changes would be made to the project site that would affect its historic integrity and a less-than-significant impact was identified with respect to historical resources. Further, the proposed project was determined to have no impact on archaeological and paleontological resources in Section V (Cultural Resources) of the SEIR. As such, no significant and unavoidable impacts were identified to resources under the prevue of the NAHC and further research, including a Sacred Lands File search is not required.

Local Agency

City of Beverly Hills (BEV), 10/11/2012

Comments

BEV



October 11, 2012

Los Angeles County
Department of Parks and Recreation
Attn: Joan Rupert, Section Head, Environmental and Regulatory Permitting
510 S. Vermont Avenue, Room 201
Los Angeles, CA 90020
Via Email: jrupert@parks.lacounty.gov, hard copy to follow

Subject: Draft Supplemental Environmental Impact Report for the Proposed Operational Changes to the Virginia Robinson Gardens

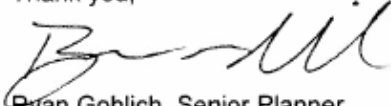
Dear Ms. Rupert,

Thank you for the opportunity to comment on the subject environmental report.

The City of Beverly Hills encourages the Los Angeles County Department of Parks and Recreation to study the street segment on Elden Way between the subject property and the Elden Way / North Crescent Drive intersection using the City's traffic thresholds of significance. And, if an impact is identified, explore reasonable measures to mitigate the impact. The City's thresholds are attached for your convenience.

If you have any questions, or would like to discuss further, please contact the undersigned.

Thank you,



Ryan Gohlich, Senior Planner

City of Beverly Hills
455 N. Rexford Drive
Beverly Hills, CA 90210
(310) 285-1194
rgohlich@beverlyhills.org

■
| BEV-1
■

RESOLUTION NO. 1586

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF BEVERLY HILLS ADOPTING THRESHOLDS OF SIGNIFICANCE FOR TRAFFIC IMPACTS

WHEREAS, the City Council of the City of Beverly Hills has requested revisions to the City's thresholds of significance for certain traffic impacts, which are utilized in the City's actions implementing the California Environmental Quality Act (CEQA) to be more aligned with adjacent jurisdictions.

WHEREAS, Planning Commission finds and determines that the City of Beverly Hills' existing thresholds of significance for certain traffic impacts, which are utilized in the City's actions implementing the California Environmental Quality Act (CEQA), have not been amended in over twelve (12) years and are not reflective of the thresholds used by adjacent jurisdictions; and

WHEREAS, on June 24, 2010, the Planning Commission held a public meeting to discuss potential changes to the thresholds, and continued the meeting and discussion to its public meeting on July 22, 2010 and subsequently to September 16, 2010. Notice of the June 24th meeting was published in the *Beverly Hills Courier* newspaper, and opportunities for public input were provided at the June 24, July 22, 2010 and September 16 meetings.

NOW, THEREFORE, the Planning Commission of the City of Beverly Hills does resolve as follows:

Section 1. The Planning Commission finds and determines based on the staff reports and research, expert testimony from the City's Transportation Division staff, and public testimony, that the revised thresholds are more in line with those used by adjacent jurisdictions and more appropriately evaluate the traffic impacts of new development projects.

BEV-2

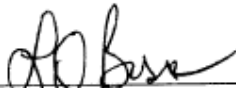


Section 2. The revised traffic thresholds change the City’s existing guidelines for analysis of the traffic impacts caused by new development. The revised thresholds are a means to evaluate impacts during the environmental review process required by CEQA and their adoption is not subject to environmental review by CEQA.

Section 3. The Planning Commission hereby adopts the revised Traffic Thresholds of Significance for the City of Beverly Hills, a copy of which is attached hereto as Exhibit “A”.

Section 4. The Secretary of the Planning Commission shall certify to the passage, approval, and adoption of this resolution, and shall cause this resolution and his certification to be entered in the Book of Resolutions of the Planning Commission of this City and a copy of this Resolution be forwarded to the City Council.

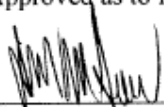
Adopted: **October 14, 2010**



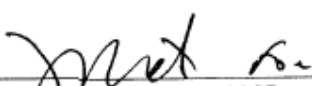
Lili Bosse
Chair of the Planning Commission of the
City of Beverly Hills, California

Attest:


Secretary

Approved as to form:


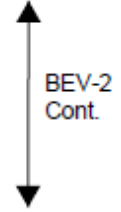
David M. Snow
Assistant City Attorney

Approved as to content:


Susan Healy Keene, AICP
Director of Community Development

BEV-2
Cont.

EXHIBIT A
Traffic Thresholds of Significance





CITY OF BEVERLY HILLS EXHIBIT "A"

Beverly Hills Traffic Thresholds of Significance

The following is the recommended traffic thresholds of significant impact for 4 different scenarios:

1. Threshold of Impacts at Signalized Intersections:

Calculation Methodology: Intersection Capacity Utilization (ICU), using criterion similar to Congestion Management Program (CMP). Selected lane capacity of 1,600 vehicles per hour.

An impact will be considered significant if traffic generated by a project causes an increase of:

- 0.020 or more on V/C at the final LOS "F"
- 0.020 or more on V/C at the final LOS "E"
- 0.030 or more on V/c at the final LOS "D" or better

2. Threshold of Impacts at Unsignalized (all-way stop) Intersections:

Calculation Methodology: Based on the most current edition of Highway Capacity Manual.

An impact will be considered significant if the following increase of average total delay per vehicle results in:

- 3.0 seconds or more average total delay at the final LOS "F"
- 3.0 seconds or more average total delay at the final LOS "E"
- 4.0 seconds or more average total delay at the final LOS "D"

BEV-2
Cont.

3. Threshold of Impacts at Unsignalized (2-way stop) Intersections:

Calculation methodology: Highway Capacity Manual (latest edition):

Significant Impact: A Change in level of service (comparison of cumulative plus without project, to cumulative plus with project) on any direction of travel:

- LOS D or better to LOS E or worse
- LOS E to LOS F
- LOS F to LOS F (resulting in increase of 10 or more average total delay (sec/veh) on any direction.

4. Threshold of Impacts at Residential (Local) Streets:

Significant Impact:

- I. ADT less than 2,000 volume per day (vpd): project increases ADT by 16%, or increases peak hour by 16% or both.
- II. ADT greater than 2,001 but less than 4,000 vpd: project increases ADT by 12% or more, or increases peak hour by 12% or more or both.
- III. ADT greater than 4,001 but less than 6,750 vpd: project increases ADT by 8% or more, or increases peak hour by 8% or more or both
- IV. ADT greater than 6,750 vpd: project increases ADT by 6.25% or more, or increases peak hour by 6.25% or more or both

BEV-2
Cont.

STATE OF CALIFORNIA)
 COUNTY OF LOS ANGELES) SS.
 CITY OF BEVERLY HILLS)

I, JONATHAN LAIT, Secretary of the Planning Commission and City Planner of the City of Beverly Hills, California, do hereby certify that the foregoing is a true and correct copy of Resolution No. 1586 duly passed, approved and adopted by the Planning Commission of said City at a meeting of said Commission on October 14, 2010, and thereafter duly signed by the Secretary of the Planning Commission, as indicated; and that the Planning Commission of the City consists of five (5) members and said Resolution was passed by the following vote of said Commission, to wit:

- AYES: Commissioners Cole, Corman, Furie, Vice Chair Yukelson, and Chair Bosse.
- NOES: None.
- ABSTAIN: None.
- ABSENT: None.



 JONATHAN LAIT, AICP
 Secretary of the Planning Commission /
 City Planner
 City of Beverly Hills, California

BEV-2
 Cont.

Responses to City of Beverly Hills (BEV), 10/11/2012

BEV-1 This comment is provided by the City of Beverly Hills which surrounds the County-owned and operated project site, the Virginia Robinson Gardens. The City encourages the County to prepare a street segment analysis for the Elden Way cul-de-sac, from the property limits to the intersection with North Crescent Drive, using the City’s traffic thresholds of significance (which are provided as part of the comment letter). Per the Thresholds of Significance provided in Comment BEV-2, particularly “4. Threshold of

Impacts at Residential (Local) Streets,” Elden Way would be characterized as per 4.I, with ADT less than 2,000 volume per day. As stated in the Draft SEIR, the proposed project would not result in a net increase of visitors daily. As the proposed project will not change operations substantially during weekdays, the increase in traffic volumes along Elden Way during weekday operation would not be substantial and would not result in an increase that would exceed the City’s Local street threshold. However, the proposed project would introduce visitors to the project site on Saturdays. Due to the existing low ADT along Elden Way and the introduction of new visitors to the project site on Saturday, the proposed project would result in an approximately 26 percent increase in ADT, above the 16 percent threshold, resulting in a significant impact (by percentage) on Saturdays only. It should be noted that this increase/threshold exceedance would not result in a change in functionality along Elden Way or the surrounding intersections.

In order to reduce this potential impact, project-related trip volumes on Saturdays would have to be reduced below 40 ADT, which would be impractical, operationally infeasible and would preclude the proposed project from meeting the identified Project Objectives. As such, an analysis of off-site parking opportunities was completed to address the feasibility of reducing the number vehicular trips to the project site on Saturday below 40 to conform to the City’s Local street threshold (Appendix G of this FSEIR). This analysis included an in-depth study of the potential use of five local parking alternatives including Greystone Mansion and Park, the Beverly Hills Women’s Club, City of Beverly Hills parking structures (two), and the use of the Cove Way parking area. In summary, this analysis determined that the use of off-site parking opportunities was not feasible. As such, the proposed project would result in a significant and unavoidable impact due to the exceedance of the City of Beverly Hill’s Local Street threshold. It should again be noted that this impact would not create an operational impact along Elden Way or the surrounding intersections.

Therefore, in accordance with the City’s Traffic Impact Analysis Guidelines, the proposed project would result in a less-than-significant impact to traffic conditions and intersection functionality and a significant impact due to the exceedance of the City of Beverly Hills Local Street threshold for traffic on Saturdays.

As is currently the situation in the residential neighborhood surrounding Virginia Robinson Gardens, special events would be attended to by valet parking which would reduce any potential impacts along Elden Way; further, these events would be restricted to four each year, would fall outside the general operating regulations of the site, and would continue to voluntarily comply with all regulations put forth by the City regarding special events. Additionally, as discussed in Draft SEIR Section XVI (Transportation/Traffic), beginning on page 114, a traffic analysis was prepared to address impacts of the proposed project. As such, no further analysis is required. However, all comments will be forwarded to decision-makers prior to consideration of project approval.

BEV-2

This comment is an attachment to the letter submitted by the City of Beverly Hills in Comment BEV-1 and provides the Thresholds of Significance for traffic impacts within the City. No response is required.

Individuals

Charles Alpert (ALP), 10/8/2012

Comments

October 8, 2012

ALP

Sent via email to jrupert@parks.county.gov

Joan Rupert
 County of Los Angeles Department of Parks and Recreation
 510 South Vermont Avenue, Room 201
 Los Angeles, CA 90020

Re: Proposed Operational Changes to the Virginia Robinson Gardens
 Comments to Draft Supplemental EIR

Dear Ms. Rupert:

Having lived in the neighborhood adjacent to the Virginia Robinson Gardens for more than fifteen years, I have been fortunate to appreciate its beauty and historic significance. Despite my appreciation for the Gardens, I believe the Draft Supplemental Environmental Impact Report dated September 2012 ("DEIR" or "SDEIR") remains fundamentally flawed. My comments in this communication address those material defects.

ALP-1

As an overview, I am especially opposed to the "commercialization" of the Garden under the guise of affording greater public access. The neighborhood's tax dollars supports the Garden as much as any other county taxpayer. Our neighborhood deserves equal respect to the push for expanded public access. Indeed, the original EIR balanced those interests. This Supplemental DEIR effectively ignores that balance.

ALP-2

The bias of the DEIR reflects an obvious one. The document at every crucial point ignores the 1980 mitigation which by implication implies the prior analysis to be incorrect. This omission represents an improper editorial prejudice throughout the document. Indeed, the Supplemental EIR, aside from a mention in the history section, never incorporates the analysis and mitigation of the original EIR. CEQA does not allow for erasing of impact analysis and mitigation.

ALP-3

A related fundamental legal flaw exists. The original EIR contained appropriate mitigation for the environmental impacts in 1980. Common sense alone supports the view that those impacts have not diminished 30 plus years later. Just try to turn right or left on Beverly Drive from Laurel Way during the rush hour on any given day. More cars traverse the neighborhood; more homes exist in the neighborhood. Noise has increased. The threshold for nuisance conditions has sharply risen in thirty years. Few can argue today that environmentally and socially the neighborhood is better off today than 30 years ago. A fair analysis will not suggest a different result. Yet, the DEIR does not seek to compare the impacts in 1980 to today's impact. The DEIR ignores the thirty year change in conditions and increase in background impacts as of 1980. If anything, the restrictions on the Gardens based on relative environmental impacts should justify more restrictive conditions than those imposed in 1980.

ALP-4

The Supplement DIR acts as if everything starts fresh because the County wants a broader use for the Gardens. CEQA does not countenance this rule. You cannot treat environmental values in a vacuum. Stated otherwise, a supplemental environmental impact report cannot ignore the findings of the original

ALP-5

EIR. CEQA protects against this form of analytical hocus pocus. CEQA stands for a full and fair evaluation. Legally, the Supplemental EIR will fall to a legal challenge on these policy grounds alone.

Still another inherent flaw in the DEIR contaminates the documents. The DEIR analysis reflects a wholly incomplete examination. The document fails to fully explore alternatives. Indeed, the DEIR explores no alternatives. An exploration of alternatives remains a critical underpinning of CEQA. I am including the table below to establish this critical failing:

Limitation	Alternatives Not Discussed
No Changes	It is a fundamental flaw not to discuss the status quo as an alternative. In this case the status quo should reflect the analysis reflect the 1980 analysis which concluded the existing restrictions/mitigations were proper. The discussion of impacts should related to the 1980 impacts.
Days Open To Public	<ul style="list-style-type: none"> • Why not Mon.-Friday, not Saturday? Students can visit on Mondays as well as Saturdays. • Why not a continued ban on all holidays? • Why not 5 days a week, just one week a month? • Why not summer hours/winter hours?
Hours For Public Use	<ul style="list-style-type: none"> • Why not 9:30 to 4 PM or 5 PM? • Why not the current schedule?
Number of Patrons	<ul style="list-style-type: none"> • Why not a combined total of 75 patrons? Environmental impacts have increased in 30 years.
Types of Events	<ul style="list-style-type: none"> • Why not continue the existing limitation to events related to the inherent nature of the gardens? • How can you weigh the impact of events when it is at the subject of the discretion of the Superintendent?
Commercial Filming	<ul style="list-style-type: none"> • Why not limit such events consistent with Beverly Hills ordinances?
Special Uses	<ul style="list-style-type: none"> • Why not conduct additional funding at outside venues capable of supporting large crowds? Many charities raise money at hotels and other public venues located in commercial areas. Some non-profits raise money without venues through raffles and other means. • No discussion is included on how additional or extended Garden promotional events would appreciably increase revenues. In fact, increased events may lead to reduced revenues as only so much money realistically can be raised. The number of events only adds costs, not necessarily increased revenues.
Parking	<ul style="list-style-type: none"> • Why not limit parking entirely to off site location with transport to Gardens? • Why make arrangements with the hotel for parking? • Why not continue ban on walk-up patrons?

I would also like to point out the following additional failings of the DEIR:

- "Currently the types or topics of daily events are restricted to educational programs or tours of the grounds for biology, botany and horticulture groups, with related classes and seminars." (Page 10).

ALP-5
Cont.

ALP-6

ALP-7

<p>This is an inaccurate statement. The Garden Website states as follows: "Please join us for a guided tour of the Robinson estate! The tour includes a walkthrough of the famous mansion, but is largely composed of viewing the historical garden paradise."</p>	▲
<p>The Garden is currently open to the public with an advance reservation plus fee. Thus the representation that the Garden has only a limited educational use restriction justifying a broader expansion of its use represents a fundamental flaw in the document.</p>	ALP-7 Cont.
<ul style="list-style-type: none"> • Site Access (Page 6) 	■
<p>The Draft Supplement EIR ignores the fundamental fact that the Garden has very limited accommodation for public visitors. To suggest various, parking or valet arrangements can substitute for this short-coming represents a fundamental flaw. The Supplemental EIR fails to address the fact that the Garden is essentially a private home not suitable for accommodation of a large public influx.</p>	ALP-8
<ul style="list-style-type: none"> • Project Objectives (Page 8) 	■
<p>The Garden was never intended for use as a major tourist attraction. The document fails to distinguish between limited public use and benefits as against a money or revenue generating tourist attraction.</p>	ALP-9
<ul style="list-style-type: none"> • "Daily events could include music in the garden, piano recitals in the Main Residence, theatre in the Garden, poetry readings, author book signings, bird watching, donor receptions or temporary exhibits ..." (Page 10) 	■
<p>Many of these events are environmentally incompatible to the numerous residences surrounding the Gardens. Public auditoriums and museums exist in commercial areas to serve these purposes. The Draft Supplemental EIR fails to account for these alternative venues. More importantly, the SDEIR neglects to account for the nuisance and environmental impacts of these events to neighboring homes.</p>	ALP-10
<ul style="list-style-type: none"> • Neighborhood Noise. (General) 	■
<p>The document fails to account for the travel of sound in the area. Due to the rolling hill nature of the topography, sounds carry considerable distance. It is possible to be right next door to an event and not hear the event, but another home blocks away will hear the sound as if the event was next door. The DEIR has conducted no investigation of the impact of the phenomenon. Noise monitors will inherently fail to account for this natural phenomenon.</p>	ALP-11
<ul style="list-style-type: none"> • Commercial Filming (General) 	■
<p>Beverly Hills has an ordinance restricting commercial filming. Neighbors must approve. The number of commercial events has an annual limit per residence. Moreover, commercial filming in the area is highly disruptive. The DEIR fails to address these impacts or explain why the city limits should not apply.</p>	ALP-12
<ul style="list-style-type: none"> • "Additionally, this change [Saturday Operations] would enable more working families to enjoy the facility on Saturdays." (Page 9) 	■
<p>What about allowing the working families living in the neighborhood to enjoy their homes on the weekend and holidays? The DEIR fails to address this fundamental concern related to the</p>	ALP-13
	▼

surrounding residential area. Families fully surround around the Gardens. Saturday and Holiday operations have not been reasonably justified in any way. The DEIR fails to respond to notion that Saturday operations amounts to a de facto zoning change of the area to the detriment of the area. Per City code, none of the homes in the area can operate an open public business from their residence on Mon-Fri let alone on a Saturday or Holidays.

- DEIR fails to mention increased nuisance and traffic issues triggered by influx of tour buses in the neighborhood. Tour buses have become a constant on the streets in the area causing traffic congestion and aesthetic nuisance.
- DEIR fails to account for the heavy rush hour traffic on Beverly Drive, Cold Water Canyon, Lexington and Sunset. Traffic studies fail to take into account peak conditions and weekend conditions. Every neighbor can testify to the difficulty of turning onto Beverly Drive. A limited-time traffic count does not do justice to extraordinary traffic increases due to accidents on the I-405.
- DEIR fails to detail increased need for police and fire protection. How will the county provide such protection with increased hours, events and attendance? What are the impacts on the county safety agencies? Sheriff patrols are a non-existent sight currently in the neighborhood. If Beverly Hills has to supply these services, a separate analysis is necessary.
- DEIR fails to mention how the proposal will deviate from Beverly Hills ordinances? I have previously noted the filming ordinance. The City has restrictions on workers doing construction on weekends and weekdays after certain hours. Valet ordinances, parking restrictions and other applicable ordinances should be discussed. Businesses cannot operate in this residential area like the Garden proposes.
- The potential impact of a seismic or fire event with the Garden hosting an event has not been discussed. In the recent past, homes have been destroyed by wildfires as near as a quarter mile or so from the Gardens. Moreover, the reservoir near the fire station represents a distinct hazard in a seismic event. None of these situations has been adequately addressed. The City does not have the public safety apparatus to support the Garden's commercial venture with large numbers of visitors in a residential neighborhood which has limited access.
- The potential impact to the vegetation and trees in the Garden caused by increased tours and attendance has not been discussed in the draft DEIR. The Garden could be significantly degraded by such increases in the short and long terms. The Gardens effectively reflect a donated residential estate, not a public museum or a botanical garden. Allowing a significant increase of attendance could threaten its existing natural beauty. Even national parks impose attendance limits. The DEIR fails to adequately address these concerns.

I recognize the standard way of approaching comments, such as those included in this letter, will be to reply with an addendum dismissing most of the criticisms by either reference to DEIR which do not directly reply to concerns or outright dismissing the concern. Such an approach will do an enormous disservice to the Gardens, the neighborhood, the County and the legal requirements of CEQA. Hastily approving the Supplemental DEIR could well lead to a legal challenge and the certainty of an ill-conceived plan.

ALP-13
Cont.

ALP-14

ALP-15

ALP-16

ALP-17

ALP-18

ALP-19

ALP-20

My considered opinion indicates that the County has material vulnerability due its failed analysis and due to the inconsistency of the document's findings with the original EIR report. Those original findings and mitigation cannot be erased arbitrarily.

The voices of the supporters of the Garden are many. I too support the Gardens, but not the change to the existing restrictions. Numbers alone should not count when it comes to CEQA – else many of our environmental treasures and open spaces would be amusement parks and shopping centers. Too many fatal flaws exist for this DEIR. The original mitigation of the 1980 EIR merits the County's full support with perhaps a minor adjustment or two – nothing as drastic as proposed. The Gardens can survive and thrive only if the current balance survives intact. I urge you to reject the SDEIR as inadequate. This may be an unpopular decision, but the only wise one in the interests of the Gardens and the county residents.

ALP-21

Respectfully,



Charles Alpert
calpert@hotmail.com

Beverly Hills Resident and Neighbor to the Garden

Responses to Charles Alpert (ALP), 10/8/2012

- ALP-1 This comment provides introductory material from the commenter, including the fact that they have been a fifteen year neighbor to the project site. No further response is required.

- ALP-2 The commenter expresses opposition to "... commercialization of the Garden under the guise of affording greater public access." Further, the commenter suggests that the "original EIR" balanced the interests of the neighborhood with perceived impacts of the operation of Virginia Robinson Gardens; concluding that the Draft SEIR effectively ignores a balance. 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. Further, contrary to the commenter's suggestion, commercialization of the Virginia Robinson Garden is not proposed under the project; rather, the project proposes the continuation of existing uses at the project site while making minor operational changes. All comments will be forwarded to decision-makers prior to consideration of project approval.

- ALP-3 The commenter suggests that the analysis provided Draft SEIR is biased. The commenter goes on to suggest that the Draft SEIR "ignores the 1980 mitigation which by implication implies the prior analysis to be incorrect ... never incorporates the analysis and mitigation of the original EIR. CEQA does not allow for the erasing or impact analysis and mitigation." This statement is factually incorrect. In fact, as

discussed in the Introduction of the Draft SEIR, beginning on page 2, the 1980 EIR established a detailed schedule, limiting the hours of operation and number of daily visitors allowed at the project site for guided tours, classes and seminars, and special events, as well as number of employees at the project site which were discussed in great detail in Table 1 (Comparison of Existing and Proposed Operations) on Draft SEIR page 4. Further, Draft SEIR page 2 states that the 1980 EIR effectively codified operational regulations for the future use of the project site and has served as the governing land use document since that time. As such, the analysis, findings and mitigation measures included in the 1980 EIR provide the background for the Draft SEIR prepared for the proposed project as clearly identified throughout the Draft SEIR; in no way was that document ignored or the Draft SEIR prepared in a “vacuum”, independent of the 1980 EIR.

Finally, Draft SEIR page 9 clearly states, “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 rewriting Section 4.05 of the Agreement to reflect the proposed changes to the days and hours of operation of Virginia Robinson Gardens.” This statement clearly identifies the intent of the County to amend the agreement that was approved based on the analysis prepared in the 1980 EIR. As such, the commenter is incorrect in their statement that the 1980 EIR, the analysis contained therein, or the intent of said document and associated agreements were ignored in the Draft SEIR.

However, in an effort to address the concerns of the commenter regarding the incorporation of previously identified mitigation measures, it is worth noting that the mitigation measures identified in the 1980 EIR are either incorporated by reference, not applicable, or have already been implemented and, therefore, may not apply to the current project. Page 39 of the 1980 EIR, Section III, C. Mitigation Measures Proposed to Minimize Significant Effects, outlines the mitigation measures alluded to by the commenter. Each mitigation measure is reproduced below and the applicability of each mitigation measure to the proposed project is discussed:

1. The proposed Virginia Robinson Gardens will be open for public visitation Tuesday through Friday between the hours of 10:00 AM and 3:00 PM. This restriction should help ease the impact of the expected increase in traffic on Elden Way and Crescent Drive by limiting it to daylight hours.

Discussion: This operating information was incorporated into the agreement approved by the County Board of Supervisors and The Friends of Virginia Robinson Gardens. A request to deviate from this is clearly articulated on Draft SEIR page 9 and reproduced above. Further, traffic related to public visitation will continue to be substantially limited to daylight hours.

2. The Robinson Gardens will be operated on a group reservation system whereby a maximum of two reserved tours lasting approximately 2 hours each will be

permitted daily. Traffic generated by each tour will arrive and leave the proposed gardens over a short period of time. Traffic, and the corresponding traffic-generated noise, will occur Tuesday through Friday during four approximately one-half-hour periods: 9:30 to 10:00 AM and 12:30 to 1:00 PM, when visitors are arriving for the tours, and 12:00 to 12:30 PM and 3:00 to 3:30 PM, when visitors are departing. During the tours no traffic will be generated by the project. By limiting daily visitation to acceptable levels, these restrictions will prevent parking and circulation problems and help mitigate such problems as privacy loss, precipitated by the change in land use from residential to public open space.

Discussion: As clearly articulated in the Introduction of the Draft SEIR and detailed in Table 1 on Draft SEIR page 4, all visitation to Virginia Robinson Gardens will still be maintained on a reservation-only system. Further, the number of visitors allowed each day will remain the same. The only deviation from the restriction on visitors is the request that any combination of tour, class or commercial filming visitors be allowed during daytime visiting hours, rather than segregating patrons of tours and classes from a daytime maximum visitors. However, the intent of this mitigation measure, to provide “pockets” of the day during which vehicles will access the site is not changing. Parking for tours, classes, and commercial filming will all still be required on site and parking along Elden Way by visitors will be prohibited.

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

Discussion: Evening events will continue to be scheduled in such a manner that they do not conflict with daytime tours. The number of annual events is clearly articulated in the Draft SEIR as six (which has been reduced as part of this Final SEIR to four). As discussed on Draft SEIR pages 10 and 11:

... Although located in the City of Beverly Hills, the project site is owned by Los Angeles County. When the County is performing a public function on a County-owned property, the County is not subject to the requirements of the City, but nevertheless can choose to comply with those regulations. For the proposed project, the County would comply with City regulations to ensure consistency with the surrounding neighborhood. While there are no restrictions on these events, especially with respect to the number of attendees, in compliance with the City’s Municipal Code, all events would comply with City of Beverly Hills requirements and ordinances, including the prohibition of amplified sound after 10:00 PM. Special events or uses typically require valet parking and staff, and the County will obtain a permit from the City to avoid overlapping with events held by adjacent/nearby neighbors. When valet is not used, shuttle buses are provided from various points in the surrounding neighborhoods to transport attendees to the Virginia Robinson Gardens. For the daytime events, attendees from the local neighborhood often arrive by foot, even though this is technically

restricted. This is consistent with events typically held throughout Beverly Hills and the adjacent neighborhood.

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

Discussion: All components of this mitigation measure have been implemented at the project site and will continue to be under the proposed project.

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

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

Discussion: All components of this mitigation measure have been implemented at the project site and will continue to be under the proposed project.

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

Discussion: As clearly articulated throughout the Draft SEIR, the proposed project does not include any construction. As such, the components of this mitigation measure are not applicable.

Finally, as per CEQA, a Supplemental EIR does not negate the analysis, findings, or mitigation measures as suggested by the commenter. Rather, the initial EIR and the Supplemental EIR become the whole of the record for consideration of a proposed project. This is clearly stated on Draft SEIR page 14.

Therefore, in summary, the proposed project and the analysis provided in the Draft SEIR do not ignore the balance of the neighborhood interests and perceived significant impacts; nor do they ignore the analysis, findings or mitigation measures included in the 1980 EIR.

ALP-4

The commenter suggests that a legal flaw exists because the Draft SEIR does not compare the impacts of the 1980 EIR to the impacts of the proposed project. Second, the commenter suggests that conditions in the neighborhood with respect to such issues as traffic and noise have increased in the 30 years since the 1980 EIR was prepared.

First, with respect to the comparison of impacts to the 1980 EIR, the commenter is correct – the Draft SEIR does not compare the impacts of the proposed project to those identified in the 1980 EIR. The CEQA Guidelines require that the environmental document prepared for a proposed project identify the baseline or existing conditions at the time that the Notice of Preparation (NOP) is published for a proposed project. “With-project” conditions are then compared to the existing conditions (or “without project” conditions) to determine the potential impacts of a proposed project. This is the analysis prepared in the Draft SEIR – the existing/baseline conditions are clearly disclosed in the Introduction Section of the Draft SEIR as well as within each of the 17 issue area discussions. Impacts of the proposed project are then defined against these existing conditions utilizing the CEQA thresholds. This provides the most accurate analysis. If the impacts of a project were determined from baseline conditions of, for example, 30 years ago, the analysis would be substantially skewed. Further, a comparison of the current impacts to those of a project some 30 years ago is not relevant (nor required) under CEQA.

As discussed on Draft SEIR page 13, the Draft SEIR is intended to provide decision-makers and the public with information that enables them to consider the environmental consequences of the proposed project ... In a practical sense, EIRs function as a technique for fact-finding, allowing an applicant, concerned citizens, and agency staff an opportunity to collectively review and evaluate baseline conditions and project impacts through a process of full disclosure.

To the commenter’s second point that conditions have changed within the last 30 years around the project site, he is correct. Accordingly, as discussed above and required by CEQA, 2012 baseline or existing conditions were utilized to determine the impacts resulting from the proposed project. Significant impacts to traffic were not identified. As such, no further response is required.

Refer also to Response ALP-3.

ALP-5

The commenter erroneously suggests that the Supplemental EIR “... acts as if everything starts fresh because the County wants a broader use for the Gardens.” However, on a more analytical point, the commenter correctly suggests that the current project and environmental analysis cannot ignore the findings of the previous EIR

(presumably the 1980 EIR in this case). Refer to Response ALP-3 and Response ALP-4.

ALP-6

This comment states that the D[S]EIR reflects a “wholly incomplete examination”. However, the commenter does not raise a specific environmental issue; therefore, no further response is required or provided.

The commenter goes on to suggest that the Draft SEIR needed to include an analysis or exploration of project alternatives to meet the requirements of CEQA. However, this is not the case.

Presumably, the reference to CEQA that the commenter is making is to the fact that as part of preparation of an EIR, analysis of alternatives to the proposed project to reduce identified project-related impacts should be undertaken. 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. The alternatives discussion should not consider alternatives whose implementation is remote or speculative, and the analysis need not be presented in the same level of detail as the assessment of the project. As the proposed project was found to result in no potentially significant impacts and would not require the implementation of mitigation measures, analysis of project alternatives is not necessary; this includes the analysis of the “status quo” as suggested by the commenter. Analysis of the “No Project” Alternative would result in the same findings as the analysis of the proposed project. The intent of CEQA is not to unduly burden a project applicant with environmental analysis but rather to act as a process of full disclosure; as such, analysis of the No Project Alternative would be redundant and would not provide unique or helpful information for decision-makers or the public. Again, analysis of alternatives would not be necessary.

As discussed in Response ALP-3 and in the Draft SEIR, the whole of the record, especially with respect to CEQA, includes the 1980 EIR in combination with the Supplemental EIR. Accordingly, alternatives to the proposed project analyzed in the 1980 EIR were analyzed which propagates the record for the required Alternatives analysis. As discussed in Response ALP-3 and ALP-4, the analysis, findings, and mitigation measures of the 1980 EIR inherently (and by reference) provide the baseline for the existing analysis as the requirements of the 1980 EIR were codified into an agreement between the Los Angeles County and Friends of Virginia Robinson Gardens to create operational limitations of the Garden. The proposed project is a minor modification to this agreement, as disclosed in the Draft SEIR and discussed in Response ALP-3. No additional analysis of Alternatives is required by CEQA.

As part of Comment ALP-6, the commenter includes a variety of “alternative” scenarios to the proposed project. However, these are opinions of the commenter as to alternate operational scenarios that may or may not result in similar or more

significant impacts than identified for the proposed project. As discussed above, in the event that analysis of alternatives was required, CEQA requires only that a reasonable range of alternatives be analyzed, which does not include all of those identified by the commenter. Further, as discussed above, alternatives to the proposed project would not be required to be analyzed because the proposed project would not result in any potentially significant impacts. Finally, the intent of the alternatives analysis is to reduce project-related impacts; the commenter does not identify what issue area they believe the proposed project would generate a perceived impact. As such, it is not possible, nor prudent, to undertake analysis of any of the scenarios provided. No further response is required.

ALP-7 The commenter opines that information provided on the website for the Virginia Robinson Gardens identifies a sufficiently wide range of tour topics (i.e., a tour of the residence and garden) thereby negating the need for a request to broaden the topics of daily events. This comment does not raise a specific environmental issue; accordingly, it is difficult to respond in a technical, CEQA-based manner. 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, as discussed in Response ALP-3, the County is requesting a discretionary action—an amendment to the existing operating agreement between the County and Friends of Virginia Robinson Gardens. All comments will be provided to decision-makers prior to consideration of the proposed project.

ALP-8 The commenter suggests that the Draft SEIR “ignores” the fact that the Virginia Robinson Gardens “... has very limited accommodation for public visitors”, representing a fatal flaw in the document. Contrary to the commenter’s opinion, as stated on Draft SEIR page 6, parking at the Virginia Robinson Gardens is limited to the 20-space visitor parking lot and the three parking spaces located along the driveway. Further, the Draft SEIR acknowledges that all patronage of the Virginia Robinson Gardens requires a reservation, a process by which staff can manage all parking-related issues. Further, as discussed on Draft SEIR page 6, only for special uses/events at the site would a valet parking arrangement be utilized. This is consistent with events in the city of Beverly Hills and all functions would be held in compliance with Beverly Hills regulations.

Finally, the commenter opines that the Virginia Robinson Gardens is essentially a private home and cannot accommodate large, public influxes. It is important to note that the request at hand is to make minor 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 Draft SEIR page 2. As such,

the opinion of the commenter that the project site cannot be utilized for public purposes is inaccurate and no further response is required.

ALP-9

The commenter opines that the project site was never meant to be a “major tourist attraction”, suggesting that limited public use is acceptable. Contrary to the suggestion of the commenter that the project site would be a “major tourist attraction”, Draft SEIR page 2, the project site was “... established as a facility for testing, planting, and demonstrating the natural growth of plants that cannot be grown at other arboretum facilities in the County, allowing for educational programs and special tours of the grounds for biology, botany, and horticulture groups with related classes and seminars. The [1980] EIR established a detailed schedule, limiting the hours of operation and number of daily visitors allowed at the project site for guided tours, classes and seminars, and special events, as well as number of employees at the project site (discussed in greater detail in Table 1 [Comparison of Existing and Proposed Operations]).” This does not state or allude to the fact that the project site is open for massive public influx, rather, an ordered, reservation-only garden environment. The proposed project includes a request for minor operational changes to this established protocol and would allow for the same daily maximum attendance at the site (either daily or during special uses/events) and does not suggest that a “major tourist attraction” would be created as purported by the commenter.

Finally, 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.

ALP-10

The commenter suggests that the Draft SEIR does not account for impacts of the proposed project caused by such uses as “... music in the garden, piano recitals in the Main Residence, theatre in the garden, poetry reading, author book signings, bird watching, donor receptions or temporary exhibits ...”. However, this statement is flawed by the fact that the commenter reproduces a portion of the project description (Draft SEIR page 11) that is analyzed, in its entirety, in the Draft SEIR. Impacts to neighboring homes (as identified by the commenter) are analyzed in each of the 17 CEQA issue areas, as appropriate.

Further, the commenter suggests that these uses should take place at existing museums and auditoriums that are located in commercial areas. However, these uses are generally compatible with the single-family residential nature of the area as well as events held in the Beverly Hills community. While it may be the opinion of the commenter that these uses would be better-provided at existing museums and auditoriums, the provisions of these activities at the project site has been sufficiently analyzed in the Draft SEIR and no significant and unavoidable impacts were identified. Finally, the commenter does not provide a direct comment on the content or adequacy of the Draft SEIR and does not raise a specific environmental issue where he believes that these uses would create an impact not identified in the Draft SEIR; no further response is required.

- ALP-11 This comment states that the Draft SEIR fails to account for the travel of sound, suggesting that noise monitoring cannot account for the travel of sound over the rolling hill nature of the area. As discussed beginning on Draft SEIR page 97, the topography and nature of sound at the site was accounted for and monitoring was conducted to respect this phenomena. Atkins staff monitored eight locations surrounding the project site, including those downgrade from the project site (thereby increasing the potential impact for sound nuisance). The analysis determined that the primary source for noise was vehicular in nature which would “trump” operational noise impacts of the proposed project. Contrary to the commenter’s statement, the analysis included in the Draft SEIR did account for the noise sources in the project area specifically, and is based on analysis of the area in particular, therefore accounting for inconsistencies in topography.
- ALP-12 The commenter suggests that commercial filming is sufficiently restricted within the city of Beverly Hills. However, it appears that the commenter is considering commercial *video* shoots, rather than the commercial, *still* filming shoots that are requested under the proposed project, as a continuation of the approved uses in the 1980 land use agreement and associated 1980 EIR. All parking and noise impacts would occur on-site, and would not reach off-site sources, as identified by the Draft SEIR. No further response is required.
- ALP-13 The commenter suggests that patrons should be able to enjoy the Virginia Robinson Garden during the weekdays, thereby allowing residential neighbors to enjoy their homes on weekends. Further, the commenter states that the D[S]EIR fails to address the concerns of the surrounding neighborhood. Contrary to the commenters statement, the Draft SEIR analyzes exactly the change the commenter suggests – that of opening the project site for public use/visitation on a weekend day (specifically Saturday). While use/opening of the project site on a Saturday may not be “justified” (as opined by the commenter) as a land use decision, this is different than the issue of whether or not the environmental impacts have been analyzed under CEQA. Per the analysis provided throughout the Draft SEIR, operation of the project site on Saturdays would not result in significant and unavoidable impacts. As such, no further response is required.
- The commenter goes on to state that the “... D[S]EIR fails to respond to notion [sic] that Saturday operations amounts to a de facto zoning change of the area to the detriment of the area. Per City code, none of the homes in the area can operate an open public business from their residence on Mon-Fri let alone on a Saturday or Holidays.” To address the first point regarding a “de facto zone change”, the commenter is in error that the Draft SEIR did not address this issue. As discussed on Draft SEIR page 2 and in Response ALP-3, the 1980 EIR effectively codified operational regulations for the future use of the project site and has served as the governing land use document since that time. Further, as disclosed on Draft SEIR page 9, “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 rewriting Section 4.05 of the Agreement to reflect the proposed changes to the days and hours of operation of Virginia Robinson Gardens.” This statement clearly identifies the intent of the County to amend the agreement [the de facto zone change the commenter is looking for] that acts as the underlying land use.

Finally, to address the point regarding operation of a business in a private home, as discussed in Response ALP-8, 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.

All comments will be forwarded to decision-makers prior to their consideration of project approval. No further response is required.

ALP-14

The commenter states that the D[S]EIR fails to address the influx of tour buses in the neighborhood which in his opinion cause traffic congestion and aesthetic nuisances. Contrary to this comment, a traffic study for the project area was prepared to address traffic impacts of the proposed project. This study incorporated *all* current traffic on nearby roadways which includes tour buses. As such, tour buses were included in the existing (or baseline) conditions against which project traffic impacts were measured. Further, tour buses do not frequently make their way up the Elden Way cul-de-sac and would not directly conflict with project traffic and project site access. With respect to aesthetics, as discussed above, as tour buses do not frequently make their way up the Elden Way cul-de-sac and near enough to the project site that they could be seen by patrons, impacts to aesthetics as a result of tour buses would be less than significant. The proposed project would not result in the daily use of tour buses and would therefore not regularly increase the number of tour buses in the neighborhood. Any use of buses for special uses/events (in the event that valet parking cannot be accommodated, as discussed in Response ALP-3) would be intermittent and temporary in nature. As such, impacts to aesthetics due to tour buses would be less than significant. No further response is required.

ALP-15

The commenter states that the D[S]EIR fails to account for rush hour and peak traffic conditions, as well as weekend conditions, on nearby streets. Contrary to this statement, the traffic study did exactly this. Further, as discussed on page 6 of Appendix F (Traffic Impact Analysis), the traffic analysis went as far as determining the peak hour travel time for Elden Way and the project site which turned out to be slightly different than the typical peak hours. Contrary also to what the commenter stated, 24-hour traffic counts were taken from Tuesday to Sunday to understand traffic patterns and quantities on the neighborhood streets surrounding the project site.

The commenter also states that the traffic study does not account for pressures on surface streets when there is congestion on the I-405 Freeway. Due to the distance between the project site and the I-405 Freeway, as well as the low volume of traffic generated by the project site, an analysis of impacts to the mainline freeway or

interchanges was not warranted (per Caltrans and City of Beverly Hills standards). As such, no analysis is necessary. No further response is required.

ALP-16 The commenter states that the D[S]EIR does not analyze potential impacts to police and fire protection. The commenter also states that if the City of Beverly Hills will provide these services, a separate analysis needs to be provided. To address the second point first, the City of Beverly Hills would continue to provide fire and police protection services to the project area, including the project site. As such, to address the second point, Section XIV (Public Services) of the Draft SEIR analyzed impacts to Beverly Hills police and fire protection services. Beginning on Draft SEIR page 111, the analysis determined that all impacts would be less than significant. As such, the analysis requested by the commenter has been provided in the Draft SEIR (as noted above) and no further response is required.

ALP-17 The commenter states that the D[S]EIR does not discuss how the proposed project will deviate from Beverly Hills ordinances. Generally, the reason for this is that the proposed project will not require deviation from existing ordinances. Further, as discussed throughout the Draft SEIR. For example, Draft SEIR Section XII (Noise) analyzes the potential impacts of the project against the City's Noise Ordinance. Further, the Introduction Section discusses how the proposed project, although unnecessary due to the operational jurisdiction of the County, will obtain necessary City of Beverly Hills permits for such actions as valet parking. The proposed project is a continuation of existing uses at the Virginia Robinson Gardens, including commercial filming, and involves only minor changes to the operational characteristics. Refer to Response ALP-12 and Response ALP-13.

The commenter states that the City has restrictions regarding construction, both day and time. However, as discussed throughout the Draft SEIR, the project does not propose any construction activities; rather, it is a change in the operational characteristics of the Virginia Robinson Gardens. As such, the commenter's assertion that the Draft SEIR failed to discuss this is inaccurate.

Finally, the commenter again states that businesses cannot operate in a residential area such as is proposed. As discussed above, the proposed project is a continuation of existing uses at the Virginia Robinson Gardens and involves only minor changes to the operational characteristics. Refer to Response ALP-13.

ALP-18 This comment suggests that the impacts of seismic or fire events while a special use/event is being hosted at the project site have not been addressed. In response, refer to Draft SEIR Section VI (Geology and Soils) (a)(i) through (a)(iii), where, beginning on Draft SEIR page 69 the impacts due to seismic events are analyzed in full (including during a special use/event). All impacts were determined to be less than significant.

With respect to a "fire event", refer to Draft SEIR Section VIII (Hazards/Hazardous Materials) (g) and (h), on Draft SEIR pages 81 and 82, where the impacts due to wildland fires are analyzed in full. All impacts were determined to be less than

significant, including whether or not the proposed project would impair an emergency response plan.

Finally, the commenter suggests that the proposed project is a “commercial venture”. Refer to Response ALP-13 regarding the continuation of existing uses at the project site and how the proposed project is not a business or commercial venture. As such, the analysis requested by the commenter has been provided in the Draft SEIR (as noted above) and no further response is required.

- ALP-19 This comment states that the impact to the gardens (as a whole) based on an increase in visitors has not be analyzed. Contrary to this, and in response to the commenters specific reference to vegetation and trees, refer to Draft SEIR Section IV (Biological Resources) on Draft SEIR page 58, the impact to biological resources (which include such on-site resources as trees, vegetation, flora/fauna) is considered less than significant. This includes analysis of additional patrons each day, additional days of operation each week (including the potential for Saturdays), holidays, and four additional special events. All impacts were determined to be less than significant. Further, it is important to note that the number of patrons allowed on-site daily would not exceed the current daily maximum (100 patrons); the number of patrons on-site for a special use/event would remain substantially close to what occurs currently (700 patrons). As such, the proposed change would not be considered unreasonable on a daily or annual basis. This level of patronage does not begin to reach levels of museum or national park as asserted by the commenter. As such, the analysis requested by the commenter has been provided in the Draft SEIR (as noted above) and no further response is required.
- ALP-20 This comment expresses the opinion of the commenter, including that approval of the SEIR could lead to a legal challenge and “... the certainty of an ill-conceived plan.” 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.
- ALP-21 Similar to Comment ALP-4, the commenter states that it is his opinion that the County has failed in preparing the appropriate analysis, primarily due to the lack of inclusion of the findings and mitigation measures of the 1980 EIR. Further, the commenter suggests that the County should “reject” the Draft SEIR as inadequate. Refer to Response ALP-4.
- 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.

Nancy Blumenfeld (BLU), 9/27/2012

Comments

BLU

From: NANCY Blumenfeld [mailto:ke6fmx@me.com]
Sent: Thursday, September 27, 2012 10:32 PM
To: Joan Rupert
Subject: ROBINSON GARDEN

TO :J RUPERT.
FROM: NANCY BLUMENFELD.
SUBJECT: ALLOWING MORE ACCESS TO ROBINSON GARDEN.

AS A LONG TIME BEVERLY HILLS RESIDENT I BELIEVE THAT ROBINSON GARDEN SHOULD BE AVAILABLE TO MORE PEOPLE. IT'S A TRAGEDY THAT MORE PEOPLE AREN'T ABLE TO ENJOY THE GARDEN.

THE BOARD MEMBERS WHO RUN THE GARDEN ARE DEDICATED TO MAKING THIS HISTORICAL, GORGEOUS PARK THE KEYSTONE OF ALL OUR PARKS. THEY ARE CONSIDERATE NEIGHBORS BUT HAVE BEEN UNDULY RESTRICTED BY OUT OF DATE EIR'S.

I HAVE REVIEW THEIR REQUEST AND INDEPENDENT STUDY AND THERE SEEMS TO BE NO IMPACT TO THE NEIGHBORHOOD WITH THESE CHANGES.

KIND REGARDS,
NANCY BLUMENFELD

BLU-1

Responses to Nancy Blumenfeld (BLU), 9/27/2012

BLU-1 This is a comment 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.

Ellisa Bregman (BRE), 9/22/2012

Comments

BRE

From: Ellisa Bregman [mailto:elanbre@aol.com]
Sent: Saturday, September 22, 2012 9:32 PM
To: Joan Rupert
Subject: Virginia Robinson Garedens

I have been a member of the VRG as we call it since 1994. I went on to become one of the many presidents of The Friends of Robinson Gardens in 1998.

My first visit to the Gardens was with Joan Selwyn the founder of The Friends of Robinson Gardens for the annual Children's Holiday Party. I was so impressed I became a member.


This year I am now co-chairing the Children's Holiday Party which is such a rewarding event for children who are from families who are underprivileged, children who are abused and children who are temporarily placed in homes until their family situations are remedied . Each year is so rewarding to see the wonderment of the Gardens through their eyes.

The Gardens is a place where people can come to find peace, get in touch with the simple beauty and understanding of nature along with a sense of well being and security. It is hard to explain unless you have been there.

This is the reason we as the Friends of Robinson Gardens would like the public to have more access to the Gardens. In this very busy world there are few places one can go to simply enjoy an afternoon in the Gardens , attend one of our tours or educational programs.

Please consider our requests and let us be allowed to be Friends to more of our community.

Sincerely yours,
 Ellisa L. Bregman



BRE-1

Responses to Ellisa Bregman (BRE), 9/22/2012

BRE-1 This is a comment 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.

Alan Buster (BUS), 9/26/2012

Comments


BUS

From: Alan Buster [mailto:alanbuster@yahoo.com]
Sent: Wednesday, September 26, 2012 11:57 AM
To: Joan Rupert
Subject: Proposed Changes at Robinson Gardens

Dear Ms. Rupert,

I have just reviewed the Draft Supplemental EIR. In my view, the proposed changes are modest and sensible. I think they would enable the Gardens to better serve the community without adverse impact on the neighborhood.

Alan Buster
Santa Monica, CA



BUS-1

Responses to Alan Buster (BUS), 9/26/2012

BUS-1 This comment is generally 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.

Marion Buxton (BUX), 9/19/2012

Comments


BUX

From: mwbuxton@roadrunner.com
Sent: Wednesday, September 19, 2012 1:33 PM
To: rupert@parks.lacounty.gov
Subject: voice in support of operational changes for Virginia Robinson Gardens

Having read the report and proposal, I completely support the operational changes proposed For virginia Robinson Gardens, thus allowing more public access to a true gem.

Additionally, any activity led by Mr. Tim Lindsay will be totally executed with class, grace and fairness.

Blessings,
 Marion Buxton



BUX-1

Responses to Marion Buxton (BUX), 9/19/2012

BUX-1 This is a comment 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.

Angela Cohan (COH), 9/27/2012

Comments

COH

From: Angela Cohan [mailto:cohan8@sbcglobal.net]
Sent: Thursday, September 27, 2012 7:27 AM
To: Joan Rupert
Subject: thank you

Dear Ms. Rupert,

I am very excited about the changes to the availability of the Virginia Robinson Gardens to the public.

thank you,

Angela Cohan

■
|
■ COH-1

Responses to Angela Cohan (COH), 9/27/2012

COH-1 This is a comment 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.

Cynthia Comsky (COM), 10/4/2012

Comments

COM

From: CYNTHIA COMSKY [mailto:cyncom@me.com]
Sent: Thursday, October 04, 2012 5:41 PM
To: Joan Rupert
Subject: Virginia Robinson Gardens

Dear Joan,

I am a long time resident of Beverly Hills and I live across the street from The Gardens on Cove Way.


The Board Members and the dedicated garden staff have maintained the "jewel park" in every way and it should be made available for more people to see and enjoy. It is a choice piece of Beverly Hills history to be used and appreciated. I know Mrs. Robinson always welcomed people to her home and she loved to entertain. My parents told stories of her wonderful gatherings and the tennis events.

The outdated EIR restricts the amount of visitor activity in The Gardens. Tim Lindsay has always mandated that staff and guests to "The Gardens" be courteous to surrounding neighbors. The independent study and proposed request doesn't appear pose any effect or impact to the neighborhood.

I have reviewed the Impact Report for the proposed operational changes and I am in favor of the project.

Best regards,

Cynthia Comsky



COM-1

Responses to Cynthia Comsky (COM), 10/4/2012

COM-1 This is a comment in support of the proposed project, from an adjacent neighbor. 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.

Mary deKernion (DEK), 9/26/2012

Comments


DEK

From: Mary Dekernion [mailto:mdekernion@gmail.com]
Sent: Wednesday, September 26, 2012 11:44 AM
To: Joan Rupert
Subject: Robinson Gardens

I would be a lovely thing if the regulations could be expanded for the use of the gardens by the public.

I would like to see it pass.

Thanks,
Mary K. deKernion



DEK-1

Responses to Mary deKernion (DEK), 9/26/2012

DEK-1 This is a comment 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.

Claudia Deutsch (DEU), 10/5/2012

Comments

DEU

From: artspacewarehouse@gmail.com [mailto:artspacewarehouse@gmail.com] **On Behalf Of** Claudia Deutsch | Artspace Warehouse
Sent: Friday, October 05, 2012 10:25 PM
To: Joan Rupert
Subject: Robinson Gardens

Dear Ms. Rupert,

The proposed changes to the SEIR for Robinson Gardens have no significant impact. The SEIR states: "Traffic would increase, but only incrementally, and would not degrade the current character of the surrounding neighborhood." The neighbors should be happy about the potential advantages of the changes and not fight them.

I strongly recommend the approval of this SEIR.


Sincerely,

Claudia Deutsch

--

Claudia Deutsch
Artspace Warehouse | HOT art at COOL prices.
claudia@artspacewarehouse.com | www.artspacewarehouse.com
 7354 Beverly Blvd | Los Angeles CA | 90036
 t. 323.936.7020 | f. 323.936.7454
 Tues - Sat 11am - 6pm and by appointment
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Artspace Warehouse is one of the world's leading galleries for savvy contemporary art collectors. Founded in Basel, and now with galleries in Cologne, Zurich and Los Angeles, Artspace Warehouse specializes in guilt-free international urban, pop, graffiti and abstract art. The gallery is untimidating and gives a new meaning to shopping for museum quality art within one's budget.



DEU-1

Responses to Claudia Deutsch (DEU), 10/5/2012

DEU-1 This is a comment 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.

Cynthia Fields (FIE), 9/19/2012

Comments

FIE

From: cindy fields [mailto:cf5150@hotmail.com]
Sent: Wednesday, September 19, 2012 7:38 PM
To: Joan Rupert
Subject: Virginia Robinson Gardens

As a long time volunteer I support the changes proposed in the SEIR so that we may better serve the city of Los Angeles and those that visit in making this beautiful property more accessible to all.

Thank you,
Cynthia Fields
Board Member
Friends of Robinson Gardens

■
| FIE-1
■

Responses to Cynthia Fields (FIE), 9/19/2012

FIE-1 This is a comment 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.

Teri Fox-Stayner (FOX), 9/18/2012

Comments

FOX

From: Teri Fox-Stayner [mailto:foxystory@aol.com]
Sent: Tuesday, September 18, 2012 11:04 PM
To: Joan Rupert
Subject: Please approve

Dear Ms. Rupert,

As a childrens' docent for the Virginia Robinson Gardens, I would very much hope the County Board of Supervisors will expand the Gardens' educational opportunities.

Please know that I ecourage their approval of the recommendations for more days and hours of operation for this wonderful County facility.

Sincerely,
Teri Fox-Stayner
foxystory@aol.com


■
| FOX-1
■

Responses to Teri Fox-Stayner (FOX), 9/18/2012

FOX-1 This is a comment 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.

Barbara Fries (FRI), 9/19/2012

Comments

		FRI
<p>From: BARBARA FRIES [mailto:bhfries@verizon.net] Sent: Wednesday, September 19, 2012 4:07 PM To: Joan Rupert Subject: Virginia Robinson Gardens Proposal</p>		
<p>Anything that would increase availability of the beautiful grounds to the public would be a definite plus for all concerned!</p> <p>It's such a shame that so few are aware of this jewel in the County Parks System!</p> <p>Barbara Fries 17302 Leslie Avenue Cerritos, CA 90703</p>		

Responses to Barbara Fries (FRI), 9/19/2012

FRI-1 This is generally a comment 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.

Suzanne Gilbert (GIL), 9/28/2012

Comments

GIL

From: Suzanne Gilbert [mailto:suzi.gilbert@gmail.com]
Sent: Friday, September 28, 2012 11:14 AM
To: Joan Rupert
Subject: Robinson Gardens

All parks improve life, but Robinson Gardens is both beautiful and educational. Please approve changes to the use of the gardens.

Thank you, Suzanne Gilbert

Sent from my iPad



GIL-1

Responses to Suzanne Gilbert (GIL), 9/28/2012

GIL-1 This is a comment 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.

Dorothy Kamins (KAM), 9/27/2012

Comments

<p>From: Dorothy Kamins [mailto:dorothy@pkdkamins.com] Sent: Thursday, September 27, 2012 9:18 AM To: Joan Rupert Cc: Friends of Robinson Gardens; Kerstin Royce Subject: Virginia Robinson Gardens</p>	<p>KAM</p>
<p>Dear Ms. Rupert:</p>	
<p>As a member of the Virginia Robinson Gardens, I fully support the recommendations that are proposed.</p>	
<p>Under Tim Lindsey's direction and with the members of the "Robinson Gardens", the property is continually being improved. These improvements, past and future are done with the utmost care and consideration of the neighbors. As a result I can assure you that the proposals recommended will be handled with care and allow the "Robinson Gardens" to embrace and expose visitors to the value of maintaining and enhancing such a beautiful property.</p>	<p>■ KAM-1 ■</p>
<p>Regards, Dorothy Kamins Member of Virginia Robinson Gardens</p>	

Responses to Dorothy Kamins (KAM), 9/27/2012

KAM-1 This is a comment 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.

Iris and Dick Kite (KIT), 10/10/2012

Comments

KIT

From: Iris Kite [mailto:iris.kite@me.com]
Sent: Wednesday, October 10, 2012 11:11 AM
To: Joan Rupert
Subject: Re: Virginia Robinson Gardens Proposed operational changes

We are so thrilled to have you as neighbors....and that you and the powers that be are so responsive to our needs...that anything you need to do to preserve the gardens is fine with us.

If people need to park on our street, as long as the trash is cleaned up...we are fine.

Thanks

Iris and Dick Kite

Iris Kite
1031 Cove Way
Beverly Hills, CA 90210
310-892-2791 (cell)
iris.kite@me.com
www.iriskite.com

KIT-1

Responses to Iris and Dick Kite (KIT), 10/10/2012

KIT-1 This is a comment in support of the proposed project from an adjacent neighbor. 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.

Julia Klein (KLE), 9/26/2012

Comments

<p>From: Julia Klein [mailto:jklein1954@gmail.com] Sent: Wednesday, September 26, 2012 11:47 AM To: Joan Rupert Subject: Virginia Robinson Gardens</p>	<p>KLE</p>
<p>Dear Joan,</p>	
<p>As a relatively new resident to Beverly Hills, I was amazed when I was taken to Virginia Robinson Gardens for the first time. I have become very involved in the Gardens, volunteering many hours to help with all aspects of the Garden's operations. I am always baffled when I ask people who have lived in the area if they have ever heard about this Garden, and they say, "no." Then, after visiting the gardens themselves, they are also amazed that this hidden gem has been "up the hill" from their homes and they never knew about it. I feel the reason for this is due to the very limited exposure and also limited availability to visit this special place.</p>	<p style="text-align: center;">KLE-1</p>
<p>The amount of restoration that has taken place since I have arrived is notable. It is through generous donations that the Gardens have been able to survive and flourish. But, with increased hours of visitation and usage, I am sure that other's will be so impressed by this very special and unique Garden that increased donations to maintain and restore the home and gardens will be obtained.</p>	
<p>Please approve the Proposed Operational Changes for the Virginia Robinson Gardens so this property will continue to delight people of all ages for years to come.</p>	
<p>Respectfully, Julia Klein</p>	

Responses to Julia Klein (KLE), 9/26/2012

KLE-1 This is a comment 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.

Suz Landay (LAN), 9/26/2012

Comments

LAN

From: swldesign@aol.com [mailto:swldesign@aol.com]
Sent: Wednesday, September 26, 2012 2:19 PM
To: Joan Rupert
Subject: The Virginia Robinson Gardens

As a native Los Angeleno I fully support richness of our heritage. There are so few remnants of our rich history left for us to enjoy that it is a shame that this facility has such limited access to the public.

I have been a volunteer docent at the gardens for over 10 years. During that period I have enjoyed sharing this beautiful site and presenting the long-lost lifestyle of the rich and famous of the early 1900s. Sadly, we are only able to accommodate guests on 4 week days- never on a weekend. This severely limits the public access.

In my experience the staff and guests to the gardens have all shown respect for the property and the neighborhood.

The volunteer group, Friends of Robinson Gardens is dedicated to preserving this unique property and it's heritage. They work diligently to authentically restore every facet of the site. This takes money.

Without allowing more access to the site how can these funds be generated?

We have products from the gardens- marmalades made from our fruit, a beautiful book written by our membership, botanical art we produce through our educational programs and other items. With more access we would be able to promote more revenue so that the Friends of Robinson Gardens could contribute even more money to maintain and restore this estate as it was from 1912.

The gardens represent the vision of only 2 people- Virginia and Harry Robinson- no one else ever lived on the property or influenced it. This is rare that a property would remain pristine for over 100 years. Let's ensure it's fate for a hundred more years of enjoyment for the public.

Suz Landay
620 South Irving Blvd
Los Angeles, CA 90005

LAN-1

Responses to Suz Landay (LAN), 9/26/2012

LAN-1 This is a comment 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.

Thelma Levin (LEV), 9/14/2012

Comments

LEV


From: Leslie [mailto:kavanaugh.leslie@gmail.com]
Sent: Friday, September 14, 2012 8:27 AM
To: Joan Rupert
Subject: Virginia Robinson Gardens proposed EIR changes

VRG is a wonderful attribute to our city. I am in total agreement with their proposed changes. They have been unduly restricted by very old and antiquated rules and they need to have more accessibility to the public.

I have read their entire proposal and I feel that they are opening this facility for more use while maintaining respect and privacy for its neighbors. They have even living under undo and unfair restrictions and this needs to be changed.

Thank you,
 Thelma Levin
 Neighbor

Sent from my iPhone



LEV-1

Responses to Thelma Levin (LEV), 9/14/2012

LEV-1 This is a comment 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.

Kathleen Luckard (LUC), 9/18/2012

Comments

LUC

From: Kathleen Luckard [mailto:kathleen.luckard@gmail.com]
Sent: Tuesday, September 18, 2012 4:38 PM
To: Joan Rupert
Subject: Robinson Gardens

Dear Ms. Rupert,

I am a proud docent at Robinson Gardens and happily lead tours of that beautiful place.

I wholeheartedly support all of the proposed changes to increase accessibility and operation of Robinson Gardens. The additional revenue from more tours (especially on Saturdays) and events will continue to assure this Beverly Hills/Los Angeles treasure will survive and thrive.

The additional number of people attending the tours and events will assure the treasure will become more widely known.

Please feel free to call on my for any additional support I can provide.

Sincerely,
Kathleen Luckard

LUC-1

Responses to Kathleen Luckard (LUC), 9/18/2012

LUC-1 This is a comment 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.

Mike Mc Alister (MCA), 10/12/2012

Comments

MCA

From: mike [mailto:mmmcalister@sbcglobal.net]
Sent: Friday, October 12, 2012 2:21 PM
To: Joan Rupert
Subject: Virginia Robinson's Gardens

Dear Ms. Rupert,

My name is Mike Mc Alister and I spoke to Tim Lindsay several months ago about the changes to the hours at VRG. He called me to explain what they wanted to do and why and to get my thoughts on the impact to my properties.

I own 1034 and 1036 Cove Way as well as 1055 Carolyn Way. These 3 properties back up to the entire Northwest corner of the VRG.

Upon speaking to Mr. Lindsay, I have absolutely no problem with the VRG extending their hours to include Saturdays.


I have lived at 1036 Cove way since 2000 and have always found the people at VRG very respectful to the homeowners in the neighborhood and any parties or events held at the property have had little or no impact to the surrounding neighbors.

If you have any questions, please feel free to give me a call.

Thank You

Mike Mc Alister

Sent from my iPad



MCA-1

Responses to Mike Mc Alister (MCA), 10/12/2012

MCA-1 This is a comment in support of the proposed project from an adjacent neighbor. 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.

Worthy McCartney (MCC), 9/26/2012

Comments

MCC

From: MCCARTNEY Forrest Worthy (CAR-US) [mailto:worthy.mccartney@cartier.com]
Sent: Wednesday, September 26, 2012 11:33 AM
To: Joan Rupert
Subject: The Virginia Robinson's Gardens proposed changes

Dear Mr. Rupert,

This is a very viable part of Beverly Hills and I would like for you to approve the proposed changes...certainly these types of special places make Beverly Hills what it is and more access is important.

■
| MCC-1
■

Best regards,
Worthy

Worthy McCartney
Sales Director
Cartier Beverly Hills
370 North Rodeo Drive Beverly Hills, California 90210
P: +1 310-275-4272
C: +1 917-972-0287

Discover the New Tank Anglaise Watch
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Responses to Worthy McCartney (MCC), 9/26/2012

MCC-1 This is a comment 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.

Nancy Miller (MIL), 9/28/2012

Comments

<p>From: Nancy Miller [mailto:craftyscott@aol.com] Sent: Friday, September 28, 2012 11:05 AM To: Joan Rupert Subject: Robinson Gardens Proposal</p>	<p>MIL</p>
<p>Dear Ms. Rupert,</p>	
<p>I have been a member of Friends of Robinson Gardens for eight years and have fully participated in the many programs and fund raising activities offered by the group.</p>	
<p>I am also a member of the board and editor of the newsletter. One of the major issues that the Board faces each year is public access. The estate and its magnificent gardens were left to Los Angeles County for the benefit of the community. In todays world, men and women work, and children are in school when the gardens are open. In addition, the programs and activities that are offered cannot be presented on the weekends when the community would have the opportunity to enjoy them.</p>	
<p>The neighborhood surrounding the gardens is composed of large estates with staff and personnel coming and going seven days a week. These homes do not provide parking for all these individuals causing heavy street parking. Guests of Robinson Gardens are limited to the parking within the estate and therefore do not effect the neighbors.</p>	<p>MIL-1</p>
<p>The "society" of the neighborhood also allows for several large parties a year. Friends of Robinson Gardens should be no exception. We should be allowed to have a few evening and weekend events. The restrictions imposed on the property in the 1970's do not serve the community and are not in keeping with the rights and privileges enjoyed by the other residents in the area.</p>	
<p>I strongly urge Los Angeles County Parks and Recreation, the City of Beverly Hills, and all other interested parties to approve the proposal.</p>	
<p>Respectfully,</p>	
<p>Nancy Scott Miller 310 472-5051</p>	

Responses to Nancy Miller (MIL), 9/28/2012

MIL-1 This is a comment 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.

Carol Morava (MOR), 9/24/2012

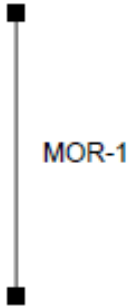
Comments

MOR

From: Carol Morava [mailto:cmorava7@gmail.com]
Sent: Monday, September 24, 2012 3:24 PM
To: Joan Rupert
Subject: Public accessibility to Virginia Robinson Gardens (VRG)

VRG is a very valuable historical asset for LA County and should be made available for visitors for the extended times as set forth in their proposal; I have volunteered for many years at VRG and know how diligent the staff is in abiding by public access rules to minimize disturbance to the surrounding neighborhood. Therefore, the additional time(s) requested will not have an adverse effect on adjacent homeowners. But it will enable more people to enjoy this beautiful and well preserved garden.

C. Morava



MOR-1

Responses to Carol Morava (MOR), 9/24/2012

MOR-1 This is a comment 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.

Tania Norris (NOR), 9/18/2012

Comments

<p>From: Tania Norris [mailto:floyd1908@aol.com] Sent: Tuesday, September 18, 2012 1:55 PM To: Joan Rupert Subject: Virginia Robinson Gardens - Proposed changes</p>	<p>NOR</p>
<p>To whom it may concern,</p>	
<p>Knowing the Virginia Robinson Gardens for the last twenty years and wishing to bring friends and out of town visitors to view the Gardens on a Monday or Saturday, has been impossible and frustrating.</p>	
<p>As the Gardens are a public Garden, I feel strongly that they should be made more user friendly both for visitors and volunteers.</p>	
<p>With the financial condition of The County of Los Angeles, I feel they should be looking for ways to help provide funds for the support of their public properties apart from using taxpayers money. By allowing the Virginia Robinson Gardens to have extended hours and days, would enable the Garden to become more financially independent.</p>	<p>NOR-1</p>
<p>The public would be more aware of the beautiful estate and the availability of the property for docent tours, educational classes, garden instruction and by extending the availability for school children, (perhaps in limited numbers to start) allow them to have an experience far different from their homes and an exposure to nature and beautiful surroundings.</p>	
<p>I sincerely hope that the extended hours and conditions will be allowed and that the dream of Virginia Robinson in deeding the gardens to the County of Los Angeles, will be fulfilled to the utmost degree.</p>	
<p>Yours truly, Tania Norris Believer in Virginia Robinson's Dream</p>	

Responses to Tania Norris (NOR), 9/18/2012

NOR-1 This is a comment 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.

Donald Philipp (PHI), 10/8/2012

Comments

PHI

October 8, 2012

Joan A. Rapert; Section Head, Environmental & Regulatory Permitting
 L.A. County Dept of Parks & Recreation
 510 South Vermont Ave, Room 201
 Los Angeles, CA 90020

PLANNING DIVISION
 OCT152012 PM 3:44

RECEIVED

Joan A. Rapert:

I have been a docent at the Virginia Robinson Gardens for 10 years. Tim Lindsay, Superintendent of the Gardens has recently informed the docents that they are still able to make written comments on the SEIR regarding proposed operational changes to the Gardens.

PHI-1

I would like to make my comments on two levels:

- the significance of the Gardens as a regional or County-wide facility and
- the specific operational changes stated in the SEIR.

By way of background, I was a Regional Planner for the L.A. County Dept of Regional Planning for 26 years between 1956-1983. In that capacity I was the prime author of the "Regional Recreation Areas Plan" adopted by the L.A. County Regional Planning Commission in December, 1959. This Plan was a joint study by both the departments of Regional Planning and Parks & Recreation. Although it was not approved or adopted by the L.A. County Board of Supervisors (it would subject the County to possibly fund facilities in incorporated cities), it does not invalidate these facilities as having county-wide recognition.

PHI-2

There are 24 identified Specialized Facilities under which the Gardens would qualify for 2 - Arboreta & Botanic Gardens and Historical Structures & Sites. The list specifically includes both the Arboretum and Descanso Gardens. Had the Gardens been in County ownership at that time, there is no doubt in my mind as lead author of the "Regional Recreation Areas Plan" that the Gardens would have been included in this list.

The Gardens internationally and prestigious address in Beverly Hills rather perversely downplays its recognition.

2

As a County-wide historical structure and associated gardens, I would suspect that most individuals seeing the address would think of it as a local attraction in this moderate-sized city rather than its more regional significance.

PHI-2
Cont.

Before I make comments about specific operational changes in the SEIR, let me briefly summarize my experiences as a Regional Planner in citizen impact (both at community meetings as well as written communications). I was involved with a variety of community plans: West Hollywood (dense residential & commercial); La Habra Heights (semi-rural density); La Canada-Flintridge (moderate residential & commercial). All of these communities had to address the issue of non-conforming uses (similar to those at the Gardens) - such as churches, fire stations, utility infrastructure. This necessitated adopting regulations to ameliorate their impact on the adjoining residential areas. Most of the neighbors' concerns related to hours of operations, parking, and type of activities - precisely those concerns which are addressed in the SEIR. As I remember these conditions they are very reasonable, particularly considering that vehicle access is limited to a short portion of the Elden cul-de-sac. More restrictive access would severely limit the ability of the County to fulfill its role to accommodate visitors to enjoy this regionally significant historical site.

PHI-3

You might be interested in a reverse situation where the adjoining neighbors to a non-conforming use were the "block hats". Following my retirement from the County, I was employed for 10 years in the Security Dept of the St. Paul Getty Museum / Malibu. This was a similar situation to the Gardens because you had a non-conforming use (the Museum) surrounded by single-family homes.

PHI-4

The Museum's 65-acre property boundaries essentially follow the drainage divide of the small creek. It came to the attention of the Museum that several of the ridge-top, income-challenged (!!) residents were encroaching on Getty Property by appropriating downslope areas for barbecue

PHI-5

3

poole, play area for kids, etc. It was not visually apparent because of dense vegetation on the slopes. As you know, this might trigger a "prescriptive rights" issue whereby after 7 years if the property owner doesn't exert his rights to deny access, he forfeits his rights to deny further access.

The Getty gave notice to the property owners that on a specific date the Getty would demolish any structures, landscaping, etc on its property. I and several other Security officers were deployed to the underground parking structure where 2 police cars were parked to be able in case there was any confrontation. Fortunately, there was none.

Sorry this letter seems to be rather lengthy but I thought you might be interested in a broader framework as you consider this SEIR for the Gardens.

Sincerely,
 Donald A. Philipp
 6348 Boney Ave
 Reseda, CA 91335

P.S. There are 2 copies the "Regional Recreation Area Plan" in the L.A. History section at the Huntington in San Marino

CC: Lindsey

PHI-5
Cont.

PHI-6

PHI-7

Responses to Donald Philipp (PHI), 10/8/2012

- PHI-1 This comment provides introductory material. 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.
- PHI-2 The commenter provides some information about his background and relationship with/to the project site. Generally, this is a comment 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.

- PHI-3 The commenter provides some information about his background and relationship with/to the project site. Generally, this is a comment 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.
- PHI-4 This comment provides background regarding the commenter and his experience in the Security Department for the Getty Villa in Malibu and relates the proposed project site to the Getty Villa in that they are both “non conforming uses”. Refer to Response ALP-3 regarding the current zoning and allowable uses on the project site (i.e., the existing and proposed uses are not considered non-conforming). Further, 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.
- PHI-5 This comment provides information on the non-conforming uses of the Getty Villa Malibu and the potential for prescriptive rights of adjacent neighbors. As this comment is not a direct comment on the content or adequacy of the Draft SEIR, no further response is required.
- PHI-6 The commenter provides more information on the background of the Getty Villa Malibu. 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.
- PHI-7 This comment provides conclusory remarks and is not a direct comment on the content or adequacy of the Draft SEIR; nor does not raise a specific environmental issue. As such, no further response is required.

Susan Rifkin (RIF), 10/8/2012

Comments

RIF

From: Susan G. Rifkin [mailto:sgrca@aol.com]
Sent: Monday, October 08, 2012 11:57 AM
To: Joan Rupert
Subject: VRG changes

I am in favor favor of extended hours and that VRG be open on Saturday, because this will provide greater access to the public.

RIF-1

Susan

--


Susan G. Rifkin
sgrca@aol.com
310.247.1594 phone
310.502.6600 cell

Responses to Susan Rifkin (RIF), 10/8/2012

RIF-1 This is a comment 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.

Greer Saunders (SAU), 10/7/2012

Comments

<p>From: Greer Saunders [mailto:greermail1@yahoo.com] Sent: Sunday, October 07, 2012 10:37 AM To: Joan Rupert Subject: Virigina Robinson Gardens</p>	<p>SAU</p>
<p>Dear Ms. Rupert,</p>	
<p>I am writing to you in support of expanded hours and extra days for Virginia Robinson Gardens (VRG). Many of the residents of Beverly Hills don't know of this first estate in BH, because VRG hours of operation are such that people who work can't tour. If the hours were extended, then many more people could tour. If they were open on Sat., we could offer more tours as well as children's tours for the county! This historic site is a place of learning and beauty and must be enjoyed by the community.</p>	 <p>SAU-1</p>
<p>I hope you will consider this request. Thank you,</p>	
<p>Greer Saunders School Tours/ VRG</p>	

Responses to Greer Saunders (SAU), 10/7/2012

SAU-1 This is a comment 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.

Debra Shaw (SHA), 10/7/2012

Comments

SHA

From: Debra Shaw [mailto:debshaw1@gmail.com]
Sent: Sunday, October 07, 2012 2:35 PM
To: Joan Rupert
Subject: Proposed operational changes to Virginia Robinson Gardens

October 7, 2012

Dear Ms. Rupert,

When reading over the proposed changes to the SEIR for this facility, I was interested to note how many of the areas of concern showed very little or no impact to the area around Virginia Robinson Gardens. The objections raised at the community hearing for the project concerned, virtually entirely, the envisioned results on the quality of life for the current residents of the cul de sac at the end of which this large and sequestered property is located. And these objections—raised primarily by the residents of one particular dwelling—turned out, when closely examined, to consist of anxiety about parking, or more specifically the ability of these residents to have access to parking on the entire street when and if they happened to be giving a party during the hours in which VRG would not be accessible to the public at all. In other words, this is an objection with little basis in reality. As the SEIR states: “Traffic would increase, but only incrementally, and would not degrade the current character of the surrounding neighborhood.”

Measured against the potential advantages of the proposed changes, which would permit the increased ability of students and others with restrictions on their weekday daytime hours to explore the site, and to benefit from the exposure to botany, wildlife, and an incredibly potent sense of a way of life dating from the very earliest days of Beverly Hills history, it seems to me that these objections might fade in significance even if they had more grounding. But the fact is that the expanded hours of operation sought by the VRG present almost no conflict at all with expressed concern of the neighbors, and what’s more, the VRG has a record of excellent co-operation with the neighbors in question.

I applaud the conclusions reached in this SEIR, and would strongly recommend its approval.

Sincerely,
Debra Shaw
9131 Callejuela Drive
Beverly Hills, CA 90210

SHA-1

Responses to Debra Shaw (SHA), 10/7/2012

SHA-1 This is a comment 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.

Charles Tellalian (TEL), 9/28/2012*Comments*

TEL

From: Charles Tellalian [mailto:sequoiaretir@earthlink.net]
Sent: Friday, September 28, 2012 4:23 PM
To: Joan Rupert
Subject: Virginia Robinson Gardens

Ms Rupert,

I am a resident who has owned and reside within a quarter mile of Robinson"s Gardens for over forty years. I would like to comment on the proposed changes to that location that you currently have under review.


Robinson"s Gardens has had both a positive cultural and environmental impact on our neighborhood. In addition it has been a "good neighbor" for as long as I have known of its existence.

The requested changes in their administration seem to be totally reasonable and should have a positive influence on the neighborhood and community in general. Even the environmental study seems to indicate not negative impact if the requested changes are approved.

The approval of the requested changes gives Los Angeles the opportunity to support the growth of historical preservation in the City and County. I support and urge the approval of the requested changes.

Sincerely,

Charles Tellalian
<mailto:sequoiaretir@earthlink.net>



TEL-1

Responses to Charles Tellalian (TEL), 9/28/2012

TEL-1 This is a comment 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.

Leslie Tillmann (TIL1), 10/6/2012

Comments

From: Casentina@aol.com [mailto:Casentina@aol.com]
Sent: Saturday, October 06, 2012 1:22 PM
To: Joan Rupert
Subject: Robinson Gardens Proposal

TIL1

Dear Ms. Rupert,

I support the proposed changes to increase public accessibility and operations of the Virginia Robinson Gardens. The expanded hours will be especially useful to broaden the educational opportunities for children and youth in our communities: one of the primary missions of the County of Los Angeles, Virginia Robinson Gardens and the Friends of Robinson Gardens.

Due to many financial cuts in schools, especially field trips and other extracurricular activities, this access is very important. Our children need to learn about the living and growing environment and this expanded time will allow for that, as school field trips are no longer available. Expanded afternoon hours will allow children from all over the County to visit Robinson Gardens after school with Girl or Boy Scouts, or will allow other youth groups to volunteer for community service hours. Saturdays will allow time for expanded time for education and service as well.

The estate buildings, which are being restored to a historic time in Mrs. Robinson's life, also represent a chance to educate both children and adults about the significance of this era for Los Angeles. When they are exposed to this rich history, all will share a respect for the built and living environment.

The staff and volunteers at Virginia Robinson Gardens all care deeply about the Gardens and will continue to give many hours of service while also continuing respectful concern for the neighborhood with this expanded usage.

Thank you,

Leslie Forester Tillmann
 Architect
 P.O. Box 968
 Palos Verdes Estates
 California 90274

TIL1-1

Responses to Leslie Tillmann (TIL1), 10/6/2012

TIL1-1 This is a comment 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.

Rolf Tillmann (TIL2), 9/26/2012

Comments

TIL2

From: rolf@buildingthebest.com [mailto:rolf@buildingthebest.com]
Sent: Wednesday, September 26, 2012 1:45 PM
To: Joan Rupert
Cc: tillcom@aol.com
Subject: Virginia Robinson Gardens

Ms. Rupert

I am in complete support of expanding the public's ability to enjoy Virginia Robinson Gardens. The value of having a magical place like this to provide a haven from the urban congestion of Los Angeles is exceptional. The addition of events will contribute more resources to preserve and continue the gardens in the way that Mrs. Robinson had envisioned when she graciously gave the property to the Los Angeles County.

I ask you to support this effort in the fullest possible way.

Thank you

Rolf Tillmann

The Marshall Group
31125 Via Colinas, Suite 908
Westlake Village, CA. 91362
Phone 818-652-6974
Email rolf@buildingthebest.com
WWW.BUILDINGTHEBEST.COM

TIL2-1

Responses to Rolf Tillmann (TIL2), 9/26/2012

TIL2-1 This is a comment 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.

Jamie Wolf (WOL), 9/25/2012

Comments

WOL

From: Jamie Wolf [mailto:jrw@artnet.net]
Sent: Tuesday, September 25, 2012 9:20 AM
To: Joan Rupert
Subject: Proposed operational changes to Virginia Robinson Gardens

September 25, 2012

Dear Ms. Rupert,

In glancing over the proposed changes to the SEIR for this facility, what's striking is the number of boxes checked either for "no significant impact" or "NO impact" (emphasis mine). The objections raised at the community hearing for the project concerned, virtually entirely, the envisioned results on the quality of life for the current residents of the cul de sac at the end of which this large and sequestered property is located. And these objections—raised primarily by the residents of one particular dwelling—turned out, when closely examined, to consist of anxiety about parking, or more specifically the ability of these residents to have access to parking on the entire street when and if they happened to be giving a party during the hours in which VRG would not be accessible to the public at all. In other words, this is an objection with little basis in reality. As the SEIR states: "Traffic would increase, but only incrementally, and would not degrade the current character of the surrounding neighborhood."


Measured against the potential advantages of the proposed changes, which would permit the increased ability of students and others with restrictions on their weekday daytime hours to explore the site, and to benefit from the exposure to botany, wildlife, and an incredibly potent sense of a way of life dating from the very earliest days of Beverly Hills history, it seems to me that these objections might fade in significance even if they had more grounding.

But the fact is that the expanded hours of operation sought by the VRG present almost no conflict at all with expressed concern of the neighbors, and what's more, the VRG has a record of punctilious co-operation with the neighbors in question.

I applaud the conclusions reached in this SEIR, and would strongly recommend its approval.

Sincerely,

Jamie R. Wolf
 812 North Foothill Road
 Beverly Hills, California 90210



WOL-1

WOL-2

Responses to Jamie Wolf (WOL), 9/25/2012

WOL-1 The commenter suggests that the objections of the community heard at the Public Meeting held for the proposed project were the voices of a very few and "... with little basis in reality." The commenter references portions of the Draft SEIR, summarizing that the analysis determined that the proposed project would result in less than significant impacts to the environment. As this comment is not a direct comment on the content or adequacy of the Draft SEIR, no further response is required.

WOL-2 This is a comment generally 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.

Tony Yakimowich (YAK), 10/10/2012

Comments

YAK

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

From: Tony Yakimowich [mailto:tonyyakimowich@yahoo.com]
Sent: Wednesday, October 10, 2012 5:26 PM
To: Joan Rupert
Subject: DRAFT SUPPLEMENTAL EIR FOR THE VIRGINIA ROBINSON GARDENS

Hello Joan,

I reviewed the subject draft report for the operation of the Virginia Robinson Garden and fully support the proposed changes. After 30 years, these changes are long overdue and currently necessary for the financial viability of the facility.

My one suggestion is to clarify the section, "Number of patrons in attendance." The limitation of 100 visitors should specifically exclude "staff and security personnel." This will avoid any confusion later on.

Best regards,

Tony Yakimowich

Sent from my iPad

This message has been checked for threats by Atkins IS

YAK-1

Responses to Tony Yakimowich (YAK), 10/10/2012

YAK-1

This is a comment generally 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.

Per the commenter's suggestion, the following text change has been made, as identified in the Changes to the Draft Supplemental EIR Section (Text Changes) of this document.

This change would not alter the existing maximum number of visitors on site daily (100) but would allow greater flexibility for the Virginia Robinson Gardens to provide programming that meets public interests while simultaneously meeting the goal of greater site accessibility. For example, under the proposed project, a 49-member class/seminar could be offered in the morning and a 51-person tour in the afternoon. However, under current operations, if both a tour and a class/seminar are offered in the same day, the total number of visitors is restricted to 50 people per tour at 10:00 AM and 1:00 PM or 100 visitors per day, or if a seminar or luncheon is scheduled, visitation is restricted to 80 persons. All public visitations would continue to require advanced reservations and parking on site. The maximum number of daily visitors (100) excludes any staff or security on site.

Appendix F Traffic Impact Analysis [Revised]

Traffic Impact Analysis
Virginia Robinson Gardens Project
Beverly Hills, Los Angeles County, California

ATKINS

475 Sansome Street, Suite 2000
San Francisco, CA

October 2013

I. Introduction

This Traffic Impact Analysis provides an analysis of the traffic and circulation associated with the Virginia Robinson Gardens site located in Beverly Hills, California. The proposed project is located north of Santa Monica Boulevard (CA SR 2), east of Benedict Canyon Drive and west of Beverly Drive. The project site is located at 1008 Elden Way, north of Crescent Drive. The purpose of this report is to present existing and with-project traffic conditions associated with the proposed project and to meet the City of Beverly Hills traffic analysis requirements.

II. Site Description

The 6.5-acre project site is located in a residential neighborhood and functioned as an estate that served as the residence of Virginia and Harry Robinson from 1911 to 1977. Subsequently, the estate was transferred to the County of Los Angeles and is currently owned and operated by the County of Los Angeles Department of Parks and Recreation. The project site currently functions as an arboretum, botanic garden and a historic estate that contains a display garden, mansion and pool pavilion. The project site is open by appointment to the public and also serves as a site for charity and fundraising events twice every year. The location of the study area is shown in Figure 1 (Study Area).

III. Existing Conditions

The operation of the approximately 6-acre facility is governed by an EIR that was prepared in 1980 to address the change in land use from a single family residence to its current land use as a public garden. The operating hours for the arboretum are by appointment-only and extend from 11:00 AM to 3:30 PM, Tuesday to Friday. Additionally, a maximum of 100 people and 20 cars are allowed on the site during the Tuesday to Friday operating hours. Mini-tour buses are allowed (as long as they can fit on site) and vehicles visiting the site must park on-site. In addition, two large fundraising events are held on-site annually. Parking for such events is accommodated through valet parking or shuttle buses from the surrounding neighborhood.

Adjacent Street System

The study site is located at the end of a cul-de-sac at 1008 Elden Way. Regional access would be provided by Interstate 405 (I-405). Figure 2 (Project Vicinity and Study Intersections) displays the existing roadway network in the vicinity of the project site, as well as the intersections studied in this traffic analysis.

Regional Access

I-405 is a ten-lane (four mixed flow plus one HOV) freeway providing the primary regional access to the project site. It is a major north / south highway west of Beverly Hills, extending from Santa Clara to Westminster. In the vicinity of the City of Beverly Hills, I-405 has an interchange with Sunset Boulevard, Wilshire Boulevard, and Santa Monica Boulevard which are located just south of the study area and provide access from the study site via Benedict Canyon Drive and Beverly Drive.



Figure 1 Study Area

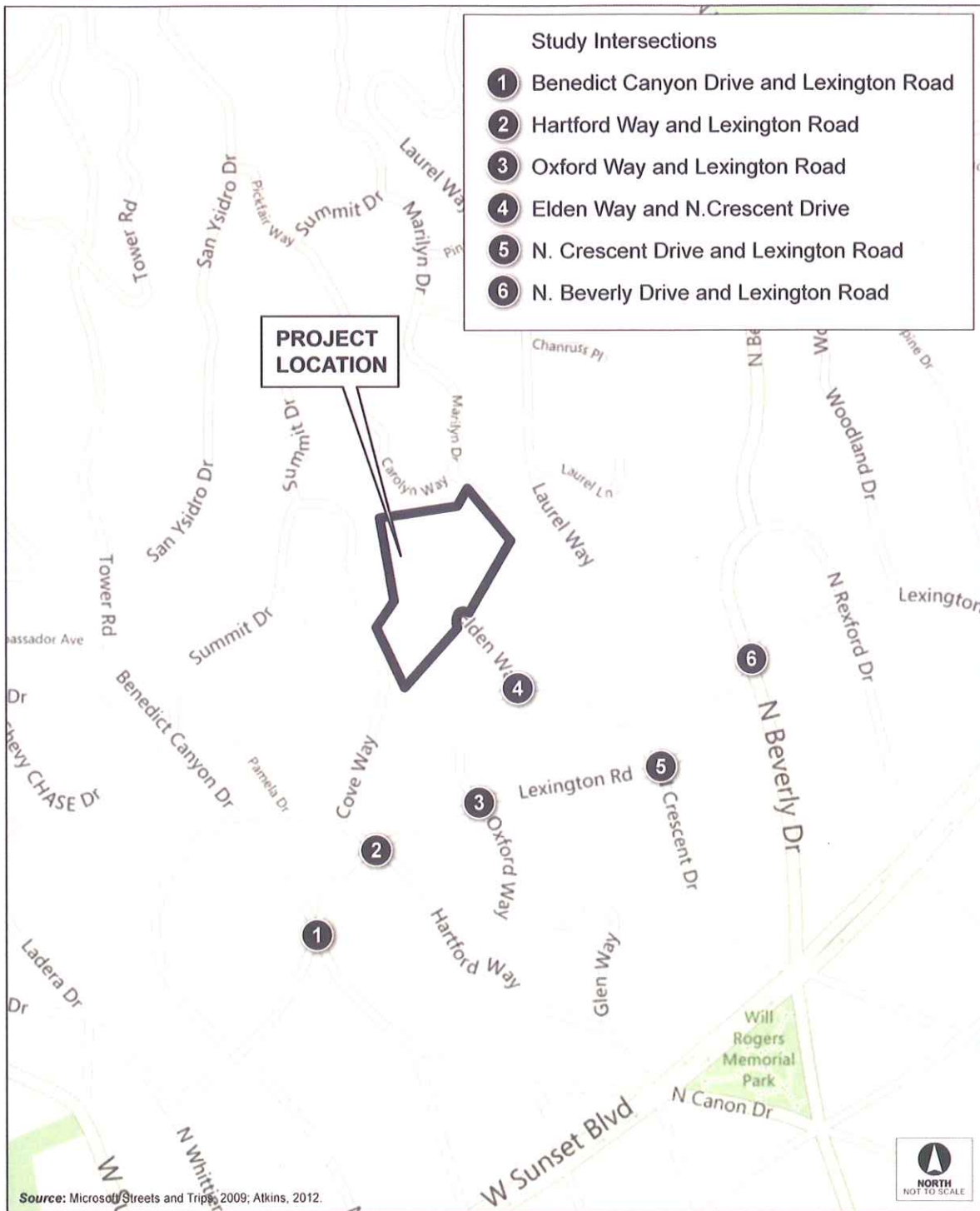


Figure 2 Project Vicinity and Study Intersections

Local Access

Benedict Canyon Drive is a two-lane north/south collector roadway in the vicinity of the study area that extends from Santa Monica Boulevard to Mulholland Drive, both of which interface with I-405 to the west via interchanges.

Beverly Drive, similar to Benedict Canyon Drive, is a two-lane north/south collector roadway in the vicinity of the study area. Beverly Drive extends from Santa Monica Boulevard in the south to Coldwater Canyon Drive to the north. Beverly Drive functions as a major roadway that provides critical north/south connectivity through the City of Beverly Hills.

Lexington Drive is a two-lane east/west arterial, south of the project site. The roadway extends from Whittier Drive on the west side and Beverly Drive to the east, terminating at Sunset Boulevard to the south.

Traffic Volumes

Exploratory machine counts were conducted on Crescent Drive and Elden Way from Tuesday to Sunday in June 2012. The goal of these counts was to determine the peaking characteristics of the site traffic and to determine the analysis periods for the project site. Review of the machine counts indicated that the roadway adjacent to the study area experienced peaks from 7:00 AM to 8:00 AM in the morning and from 4:45 PM to 5:45 PM in the evening.

Review of temporal distribution of daily traffic indicates that the roadway experiences the highest traffic on Thursdays and the lowest traffic on Sundays. Traffic on Fridays is similar to daily traffic on Thursdays. Traffic volumes on Saturdays are lower than the weekday peak volumes and occur during the middle of the day as opposed to the PM peak for weekdays. Figure 3 (Existing [2012] Weekly Volume Variation) shows the weekly volume variations on Elden Way and Crescent Drive.

Review of daily traffic distribution indicates that the AM peak hour volume on Elden Way is less than 10 vehicles per hour and the PM peak hour is approximately 25 vehicles per hour. Elden Way accommodates higher volumes on weekdays as compared to weekends and experiences the highest volumes between 11:00 AM and 2:00 PM. Weekend volumes on other roadways are approximately half of weekday traffic. Daily volume variation on Elden Way is shown in Figure 4 (Existing [2012] Daily Volume Variation—Elden Way). Traffic related to construction activities in the neighborhood and parking overflow traffic from other streets in the entire area/neighborhood parks on Elden Way because it's the only street that has no parking restrictions. For example, Crescent Drive, Lexington Street and other local street all have 2-hour parking restriction which is absent on Elden Way. However, no volume reductions were performed to study counts and this yields a conservative analysis of operations.

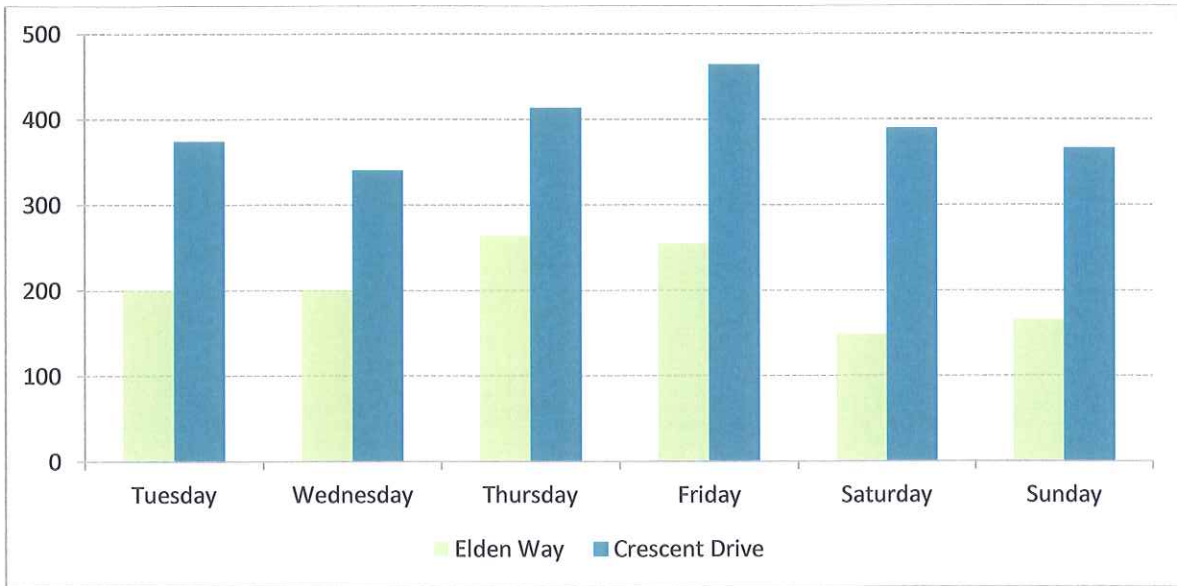


Figure 3 Existing (2012) Weekly Volume Variation

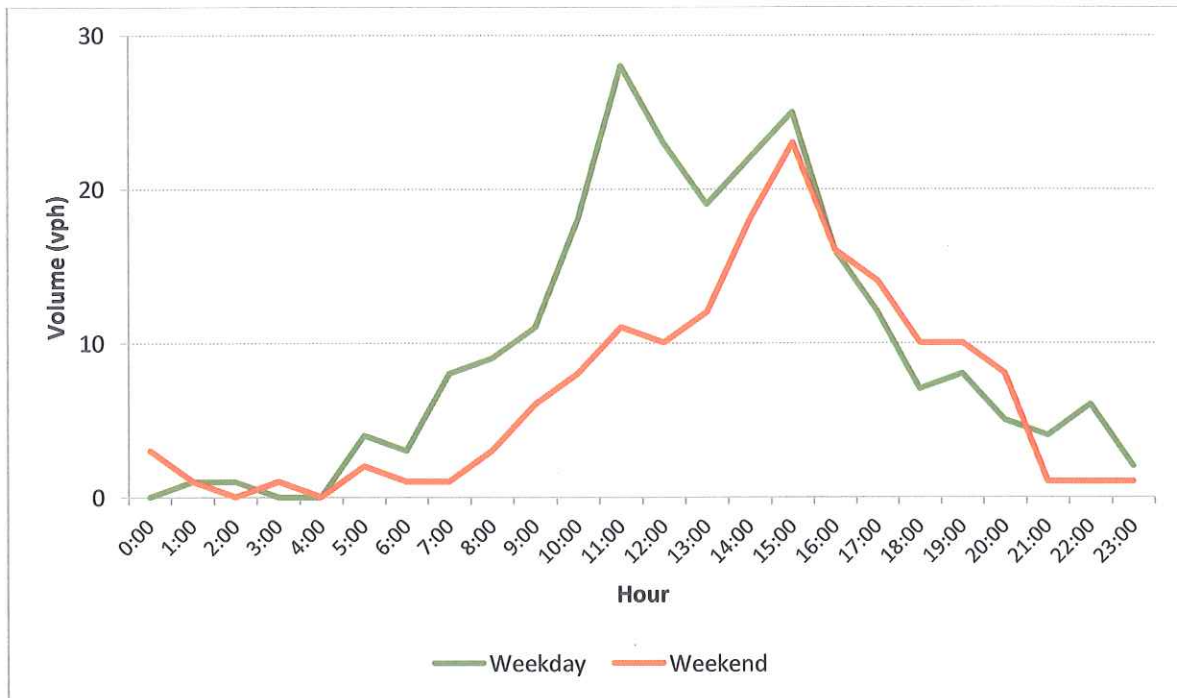


Figure 4 Existing (2012) Daily Volume Variation—Elden Way

The traffic counts also revealed that the project site did not experience any traffic during the morning peak and that the traffic intensity for the PM peak hour was much higher than that observed for the AM peak. Due to these observed patterns, the PM peak hour was determined to be 4:45 PM to 5:45 PM for the analysis. Existing year 2012 intersection operating conditions were evaluated for the evening (4:45 PM to 5:45 PM) peak periods. Detailed count sheets are provided in Appendix A. Intersection turning movement counts were collected at study intersections on two midweek days (Tuesday or Wednesday) in late June 2012. The following six study intersections were analyzed:

1. Benedict Canyon Drive and Lexington Road
2. Hartford Way and Lexington Road
3. Oxford Way and Lexington Road
4. Elden Way and N. Crescent Drive
5. N. Crescent Drive and Lexington Road
6. N. Beverly Drive and Lexington Road

All roadways in the study area are two-lane roadways with no turning lanes at intersections. The intersections of Benedict Canyon Drive and Lexington Road and N. Beverly Drive and Lexington Road are signalized intersections. The remaining intersections are side-street stop-controlled intersections. Existing PM peak hour volumes are shown in Figure 5 (Existing [2012] PM Peak Hour Turning Movement Counts).

Operational Analysis

To measure and describe the operating conditions of intersections, a rating system called Level of Service (LOS) is commonly used. The LOS is a qualitative description of the performance of an intersection based on the average delay per vehicle. Intersection levels of service range from LOS A, which indicates free flow or excellent conditions with short delays, to LOS F, which indicates congested or overloaded conditions with extremely long delays. LOS A through LOS D is considered excellent to satisfactory service levels, LOS E is undesirable, and LOS F conditions are representative of gridlock. The study intersections, both signalized and unsignalized, have been evaluated using the Highway Capacity Manual (HCM) 2010 methodology.

Signalized Intersections

For signalized intersections, HCM methodology determines the capacity of each lane group approaching the intersection. The LOS is then defined based on average delay (in seconds per vehicle) for the various movements at the intersection. A combined weighted average delay and LOS are presented for the intersection. In addition to HCM methodologies, Intersection Capacity Utilization (ICU) methodologies were used to compute intersection LOS in accordance with the analysis procedures of the City of Beverly Hills. Table 1 (Level of Service Criteria—Signalized Intersections Average Seconds of Delay) presents the LOS criteria for the signalized intersections.

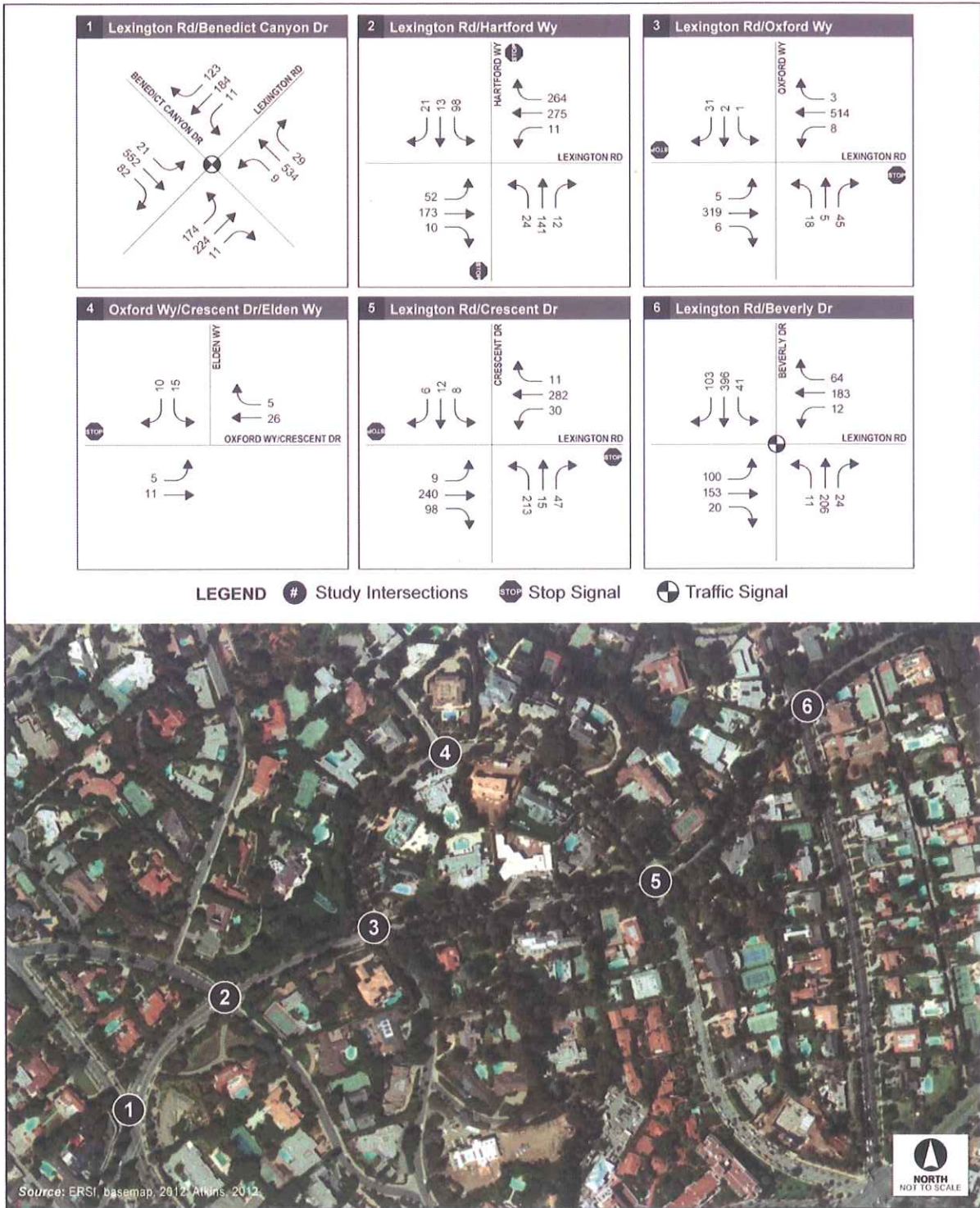


Figure 5 Existing (2012) PM Peak Hour Turning Movement Counts

Table 1
Level of Service Criteria—Signalized Intersections Average Seconds of Delay

Level of Service	HCM Signalized Intersection Delay (sec/veh)	ICU Thresholds
A	0.0–10.0	0–0.55
B	>10–20	>0.55–0.64
C	>20–35	>0.64–0.73
D	>35–55	>0.73–0.82
E	>55–80	>0.82–0.91
F	>80	>0.91

SOURCE: TRB, *Highway Capacity Manual*, Special Report 209 (2010).

Unsignalized Intersections

For unsignalized (all-way stop-controlled and side-street stop-controlled) intersections, the method outlined in Chapter 17 of the Transportation Research Board's 2010 HCM was used. This method estimates the worst-approach total delay (measured in seconds per vehicle) experienced by motorists traveling through an intersection. Total delay is defined as the amount of time required for a driver to stop at the back of the queue, move to the first-in-queue position, and depart from the queue into the intersection. Table 2 (Level of Service Criteria—Unsignalized Intersections Average Seconds of Delay) summarizes the relationship between the delay and LOS for unsignalized intersections. Synchro software was used to calculate HCM-based LOS for unsignalized intersections.

Table 2
Level of Service Criteria—Unsignalized Intersections Average Seconds of Delay

Level of Service	Signalized Intersection Delay (sec/veh)
A	0.0–10.0
B	>10–15
C	>15–25
D	>25–35
E	>35–50
F	>50

SOURCE: TRB, *Highway Capacity Manual*, Special Report 209 (2010).

Analysis of existing intersection operations indicate that three of the six intersections operate at LOS F and the remaining intersections operate at LOS D or better. Intersections of Hartford Way and Crescent Way with Lexington Drive are side-street stop controlled intersections and the delay reported represents higher wait time for side streets. The detailed intersection LOS calculation worksheets are presented in Appendix B.

**Table 3
Intersection Operations for Existing (2012) Conditions**

Intersection	LOS		Delay/Utilization		v/c	
	HCM	ICU	HCM	ICU	HCM	ICU
Lexington Road/Benedict Canyon Road*	C	F	21.5	95.8%	0.88	0.96
Lexington Road /Hartford Way	F	—	95.8		0.87	
Lexington Road /Oxford Drive	C	—	15.9		0.18	
N. Crescent Drive/Elden Way	A	—	8.8		0.03	
Lexington Road /N. Crescent Way	F	—	51.6		0.84	
Lexington Road /N. Beverly Drive*	B	D	10.8	81.4%	0.65	0.81

* Signalized intersection, ICU values used for comparative analysis

Bicycle and Pedestrian Facilities

Bicycle facilities are generally divided into three categories:

- **Class I Bikeway (Bike Path)**—A completely separate facility designated for the exclusive use of bicycles and pedestrians with vehicle and pedestrian cross-flow minimized.
- **Class II Bikeway (Bike Lane)**—A striped lane designated for the use of bicycles on a street or highway. Vehicle parking and vehicle/pedestrian cross-flow are permitted at designated locations.
- **Class III Bikeway (Bike Route)**—A route designated by signs or pavement marking for bicyclists within the vehicular travel lane (i.e., shared use) of a roadway.

All study roadways operate as Class III bikeways and accommodate bicycle traffic alongside vehicular traffic. Bicycle counts conducted as a part of the traffic data collection task indicate little to no bicycle traffic in the study area during the peak hour. Beverly Drive at Lexington Road experienced the most bicyclists (2 to 3 per approach) on the north and east legs of the intersections. Similarly, minimal pedestrian activity was observed in the study area. Most intersection approaches experienced 1 or 2 pedestrians during the peak hour except for the Beverly Drive/Lexington Road intersection, which experienced between 3 and 7 pedestrians during the peak hour.

IV. Traffic Impact Analysis

The project site currently accommodates a maximum of 100 patrons and a maximum of 20 vehicles per day. The project generates approximately 40 total vehicle trips a day and approximately 25 round trips a day which translates to 50 total trips a day. Figure 6 (Daily Trip Contribution of the Project Site to Elden Way for Current Conditions) shows the daily contribution of the project site to Elden Way for current conditions (existing volumes—without the proposed project changes).

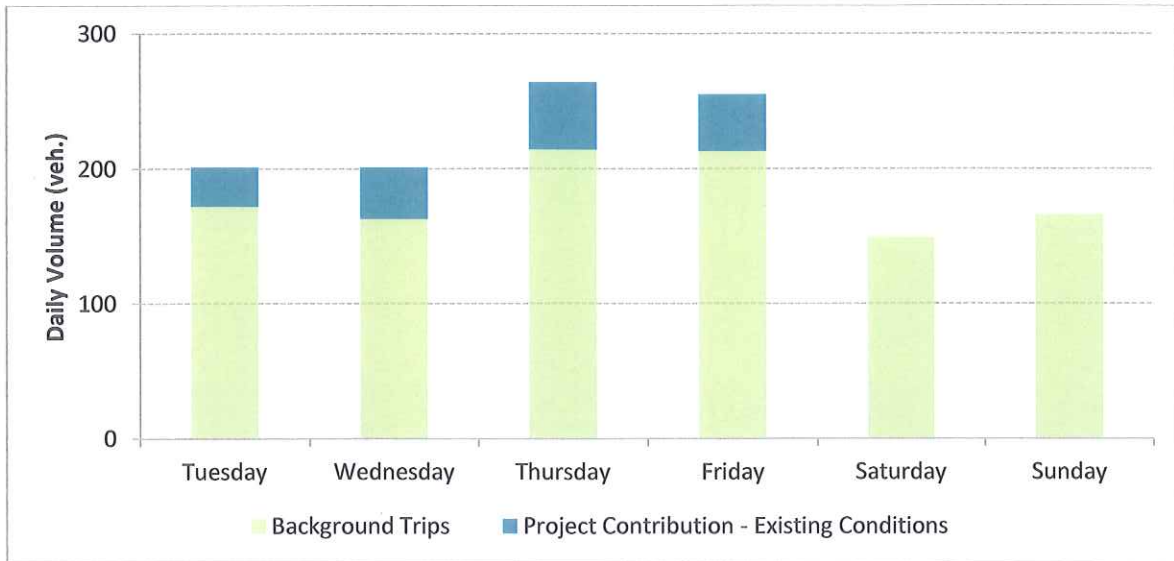


Figure 6 Daily Trip Contribution of the Project Site to Elden Way for Current Conditions

The County of Los Angeles is proposing changes to the hours and days of operation of the project site. The County is proposing to:

- Extending operating hours from 9:30 AM to 5:30 PM from March through November and from 9:30 AM to 4:00 PM for the remaining months of the year. The current hours during which the project site is open extends from 9:30 AM to 3:30 PM, while still limiting the number of visitors at a time to 100. For the purposes of this analysis, it is assumed that the site is open from 9:30 AM to 5:30 PM to allow for a conservative estimate of any potential impacts.
- A change from daily use of Tuesday–Friday to Monday–Friday (plus two Saturdays per month). The proposed opening on Saturdays will be conducted in a phased manner to help better assess and monitor the influence of weekend operations. The project site will be open on only two Saturdays every month for the first year after which the schedule will be reviewed by the District. However, for the purposes of this analysis, it is assumed that the site is open on all Saturdays to allow for a conservative analysis.
- The number of special events would increase to four per year from the existing two events per year.

These changes are not projected to result in additional trips during weekdays but are anticipated to shift the departure time of trips from the project site. Currently, the project site adds no trips during the analysis peak hour since the visiting hours end at 3:30 PM. Extending the closing time of the project site to 5:30 PM is projected to add approximately 10 trips to the PM peak hour which extends from 4:45 PM to 5:45 PM. These trips also reflect potential employee or other residual visitor trips. Resultant daily trips for proposed conditions are shown in Figure 7 (Daily Trip Contribution of the Project Site to Elden Way for Proposed Conditions) and contribution of trips from the project site to peak hour volumes are shown in Figure 8 (Peak Hour Trip Contribution of the Project Site for Proposed Conditions). As can be seen from Figure 7, the proposed conditions do not result in any change to the total daily trips on Elden Way and result in approximately 20 round trips on Saturdays. However, since the adjacent roadway experiences low volumes on weekends, these additional weekend trips are anticipated to have little to no impact on intersection operations.

Changes proposed to special events (up to two additional events annually) will occur during non-peak hours and will be accompanied by valet parking and shuttle buses in the neighborhood which would negate any impacts to intersection operations or impacts due to parking issues for these events.

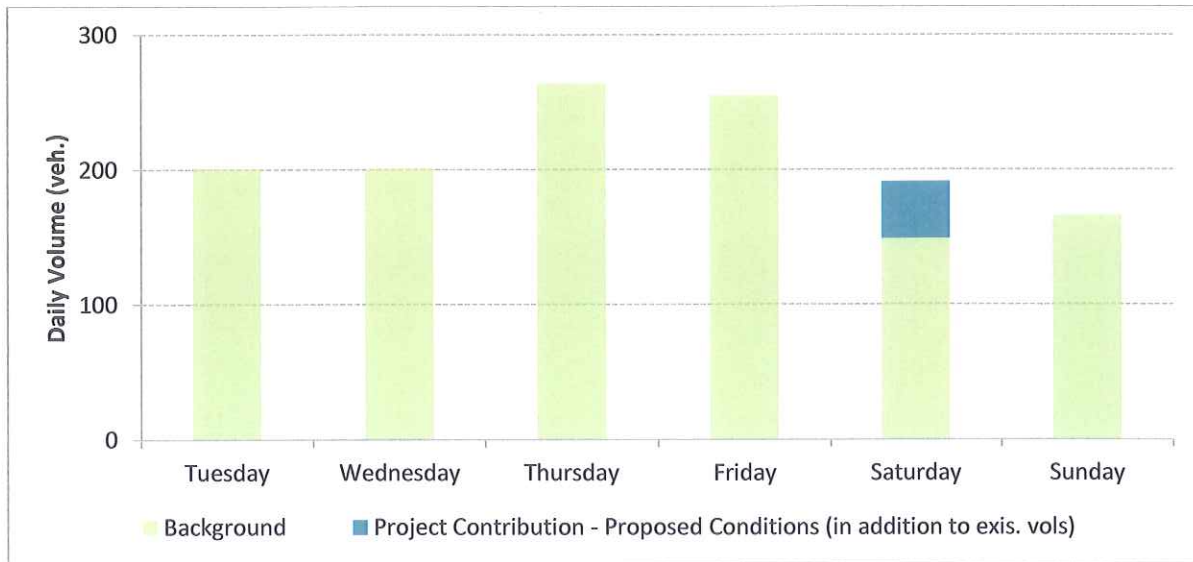
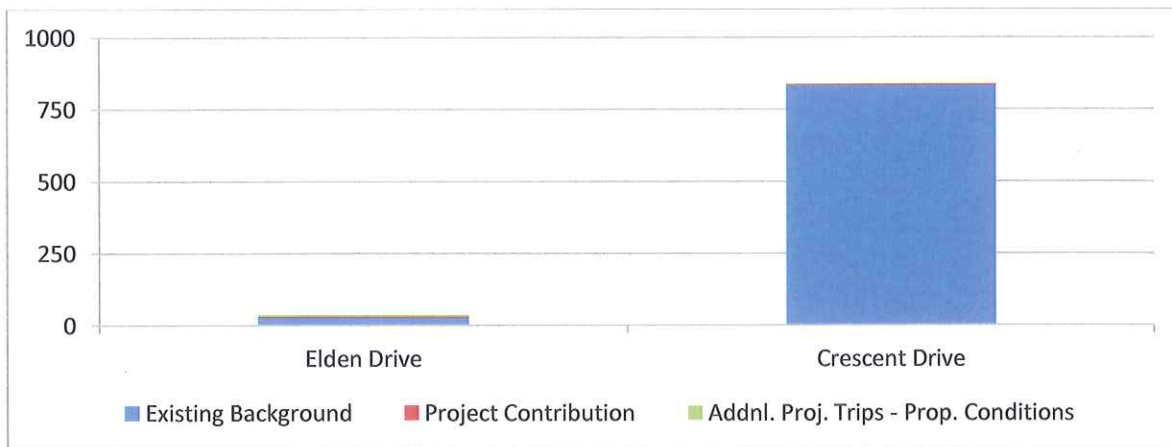


Figure 7 Daily Trip Contribution of the Project Site to Elden Way for Proposed Conditions



	Existing Background Volume	Project Contribution—Current Conditions	Additional Project Trips—Proposed Conditions	% change
Elden Way	25	5	7	19%
Crescent Drive	833	2	3	0.3%
Benedict Canyon Drive	1486	2	3	0.2%
Beverly Drive	910	3	4	0.4%

Figure 8 Peak Hour Trip Contribution of the Project Site for Proposed Conditions

As shown in Figure 8, the project adds approximately seven more trips to Elden Way during the PM peak hour. All of these project trips are egress trips that are bound towards Benedict Canyon Drive or Beverly Drive via Crescent Drive and Lexington Road. The project-generated additional trips were assigned to study roadways based on existing travel patterns from Elden Way. Resultant intersection volumes with project trip contributions are shown in Figure 9 (Existing Plus Project [2012] PM Peak Hour Turning Movement Counts). The project adds a miniscule amount of traffic to most surrounding roadways which does not impact intersection or roadway operations as evidenced by the intersection analysis for proposed conditions.

Significance Criteria

Criteria defining the significance of impact were obtained from the City of Beverly Hills' traffic study guidelines. In general, the following criteria were used to determine the presence or absence of project impact:

- A change in volume to capacity ratio of 0.040 or more if "plus project" condition LOS is D
- A change in volume to capacity ratio of 0.020 or more if "plus project" condition LOS is E or F

Existing Plus Project Conditions

Traffic generated by the proposed project was added to existing condition volumes to determine potential impacts. Table 4 (Intersection Operations for Existing [2012] Plus Project Conditions) shows the results of the intersection operations analysis for the weekday PM peak hours under Year 2012 plus proposed project traffic conditions.

Table 4
Intersection Operations for Existing (2012) Plus Project Conditions

Intersection	LOS		Delay/Utilization		v/c		Change in v/c
	HCM	ICU	HCM	ICU	HCM	ICU	
Lexington Road /Benedict Canyon Road*	C	F	21.7	95.8%	0.88	0.96	0
Lexington Road /Hartford Way	F	—	99		0.882		+0.012
Lexington Road /Oxford Drive	C	—	21.9		0.26		+0.08
N. Crescent Drive/Elden Way	A	—	8.8		0.04		+0.01
Lexington Road /N. Crescent Way	F	—	51.6		0.84		0
Lexington Road /N. Beverly Drive*	B	D	11	81.8%	0.65	0.82	+0.01

* Signalized intersection, ICU values used for comparative analysis

Similar to existing conditions without project, the intersection analysis for "with project" conditions indicates that three of the six analysis intersections operate at LOS F. However, the addition of project generated trips does not cause any of the intersections to exceed the significance criteria. Hence, the proposed project does not result in a significant impact to intersection operations.

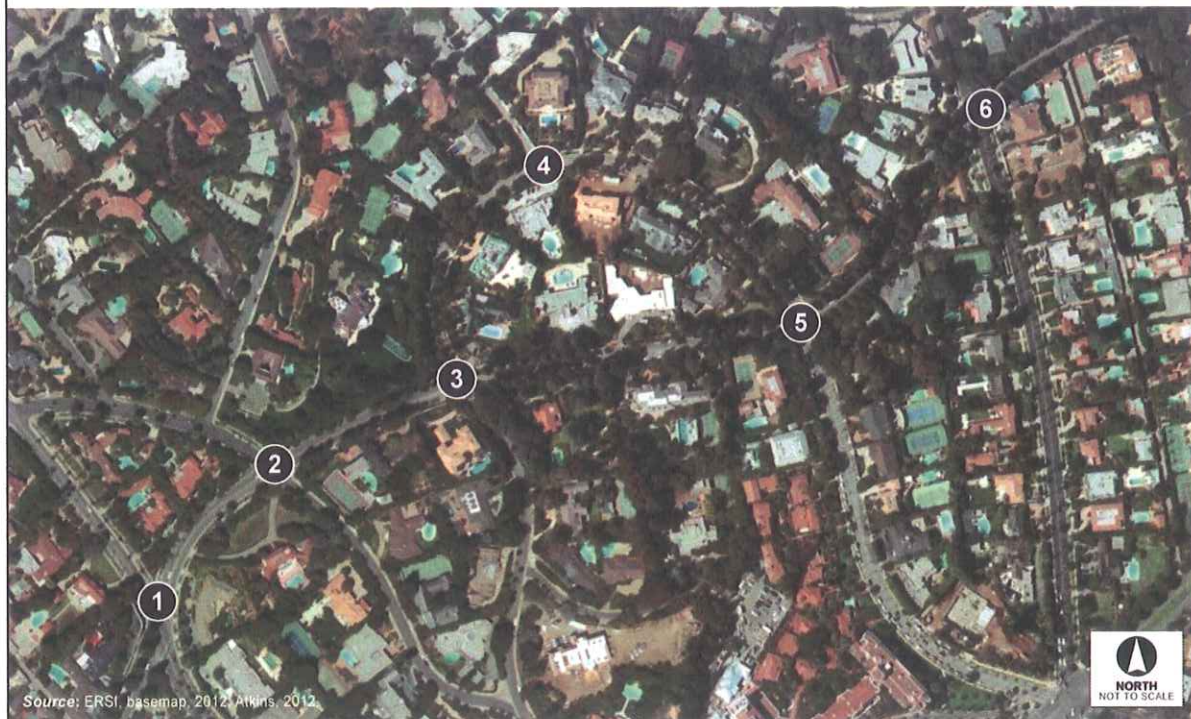
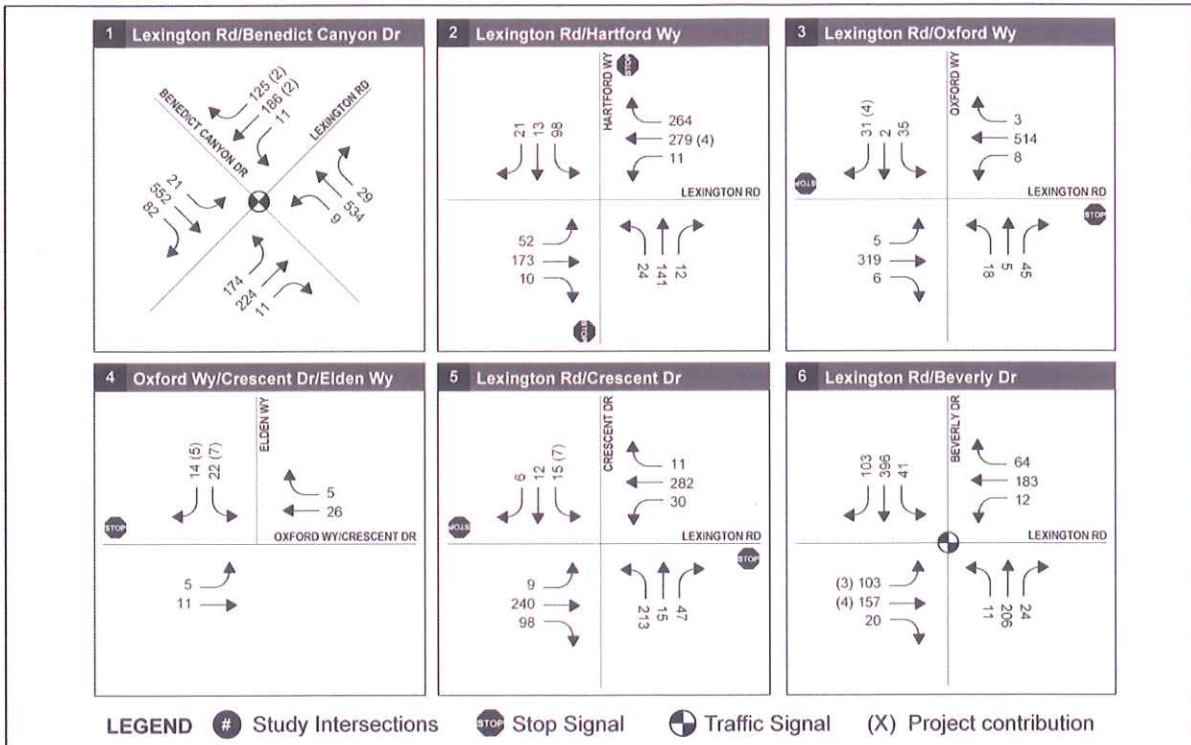


Figure 9 Existing Plus Project (2012) PM Peak Hour Turning Movement Counts

Opening Year Background Conditions

The changes proposed for the project site are anticipated to take effect by the fall of year 2013. However, opening year conditions were analyzed using year 2014 volumes to yield a conservative analysis. An annual growth rate of 1% was assumed for calculating ambient growth for the study area. This growth rate is a conservative estimate of traffic growth since the study area is built out with limited potential for significant changes to land use intensity.

Anticipated traffic growth between existing and opening year conditions is projected to result in minor increases to intersection delays as compared to existing conditions. The intersections of Lexington Road and Benedict Canyon Road, Lexington Road and Hartford Way and Lexington Road and N. Crescent Way are projected to function at LOS F as shown in Table 5 (Intersection Operations for Opening Year [2014] Conditions). In addition, the intersection of Lexington Drive and North Beverly Drive is projected to operate at LOS E for 2014 conditions as compared to LOS D under existing (2012) conditions. Intersection volumes for 2014 background conditions are shown in Figure 10 (Opening Year [2014] PM Peak Hour Turning Movement Counts).

Table 5
Intersection Operations for Opening Year (2014) Conditions

Intersection	LOS		Delay/Utilization		v/c	
	HCM	ICU	HCM	ICU	HCM	ICU
Lexington Road /Benedict Canyon Road	C	F	23.2	97.2%	0.90	0.97
Lexington Road /Hartford Way	F	—	119.8		0.96	
Lexington Road /Oxford Drive	C	—	16.2		0.19	
N. Crescent Drive/Elden Way	A	—	8.8		0.03	
Lexington Road /N. Crescent Way	F	—	58.2		0.88	
Lexington Road /N. Beverly Drive	B	E	11.2	83%	0.66	0.83

Opening Year Plus Project Conditions

Traffic generated by the proposed project was added to opening year (2014) background condition volumes to determine potential impact of project generated trips. Table 6 (Intersection Operations for Opening Year [2014] Plus Project Conditions) shows the results of the intersection operation analysis for the weekday PM peak hours under Year 2014 plus proposed project traffic conditions. Intersection volumes for opening year (2014) plus project conditions are shown in Figure 11 (Opening Year [2014] Plus Project Conditions PM Peak Hour Turning Movement Counts).

Similar to opening year (2014) conditions without project trips, the intersection analysis for “with project” conditions indicates that three of the six analysis intersections operate at LOS F. However, the addition of project generated trips does not cause any of the intersections to exceed the significance criteria. Hence, the proposed project does not result in a significant impact to intersection operations.

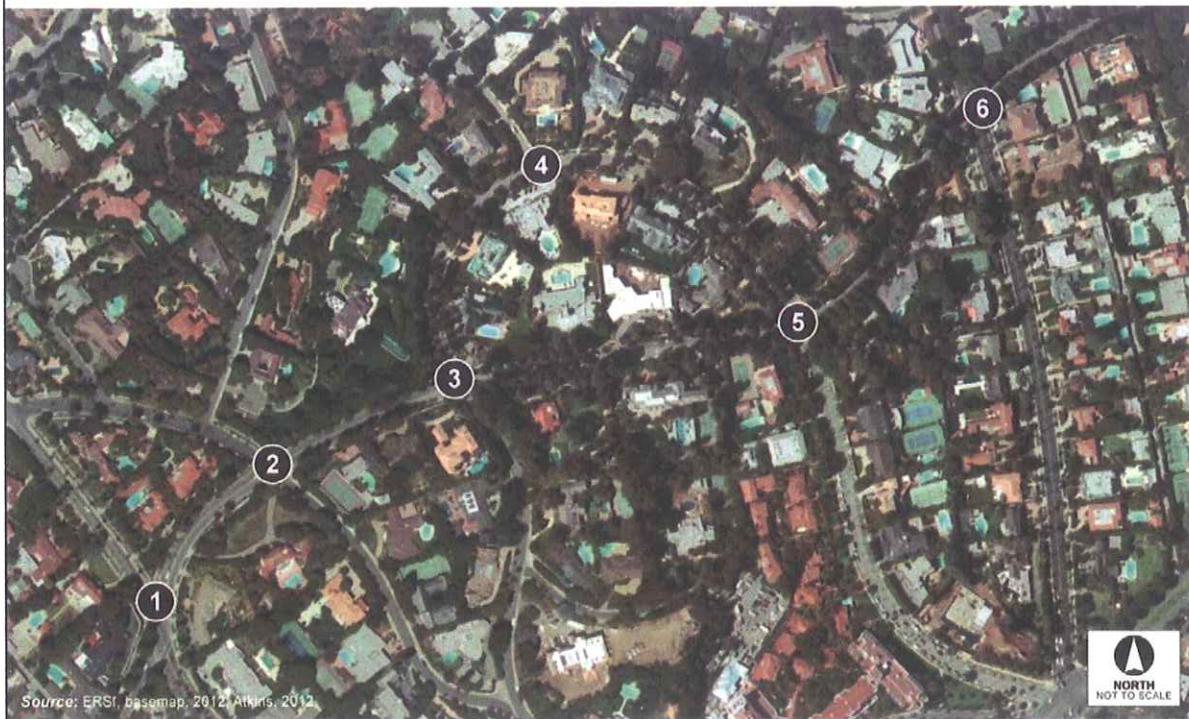
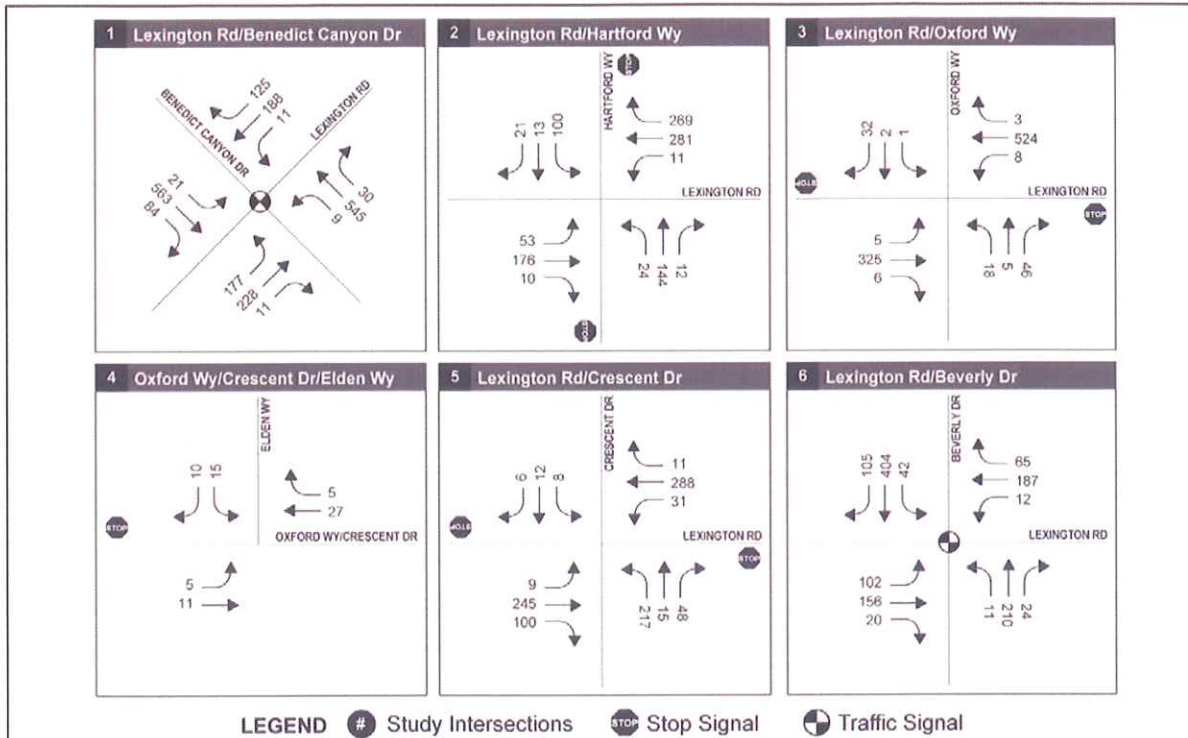


Figure 10 Opening Year (2014) PM Peak Hour Turning Movement Counts

Table 6
Intersection Operations for Opening Year (2014) Plus Project Conditions

Intersection	LOS		Delay/Utilization		v/c		Change in v/c
	HCM	ICU	HCM	ICU	HCM	ICU	
Lexington/Benedict Canyon Road	C	F	23.4	97.5%	0.9	0.97	0
Lexington/Hartford Way	F	—	124		0.97		+0.01
Lexington/Oxford Drive	C	—	16.3		0.19		0
N. Crescent Drive/Elden Way	A	—	8.8		0.04		+0.01
Lexington/N. Crescent Way	F	—	58.4		0.88		0
Lexington/N. Beverly Drive	B	E	11.3	83.4%	0.67	0.84	+0.01

V. Conclusion

The traffic analysis conducted in support of the proposed changes to operating hours for the Virginia Robinson Garden project site indicates the absence of any impacts due to these proposed changes. The proposed project would add approximately 20 round trips to the peak hour on Saturday during low traffic conditions which results in minimal changes to intersection operations. The proposed project does not add any new trips on weekdays and only results in a moderate shift of less than 15 trips during the peak hour. Analysis indicates that this shift in travel does not result in an impact to intersection operations. The proposed increase (up to two) in special events that would be held throughout the year will occur during non-peak hours and will be accompanied by valet parking which would negate any impacts to intersection operations or impacts due to parking issues for these events.

In summary, the proposed project does not result in significant impacts to traffic or parking operations in the study area.

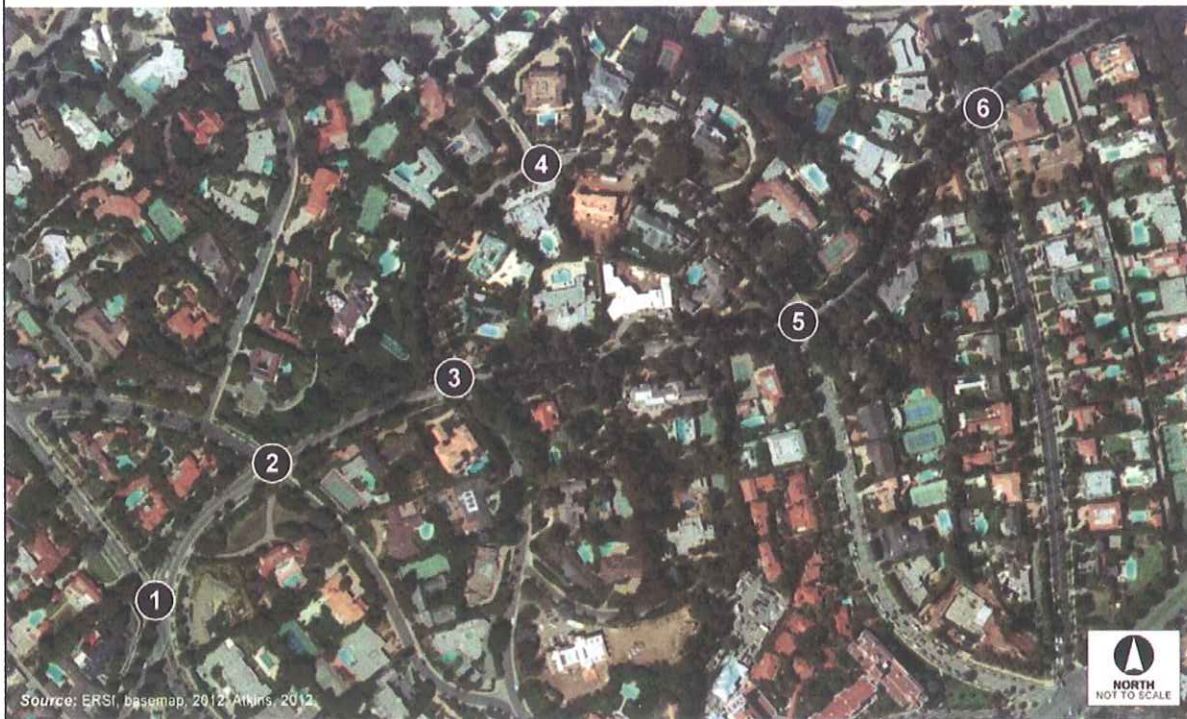
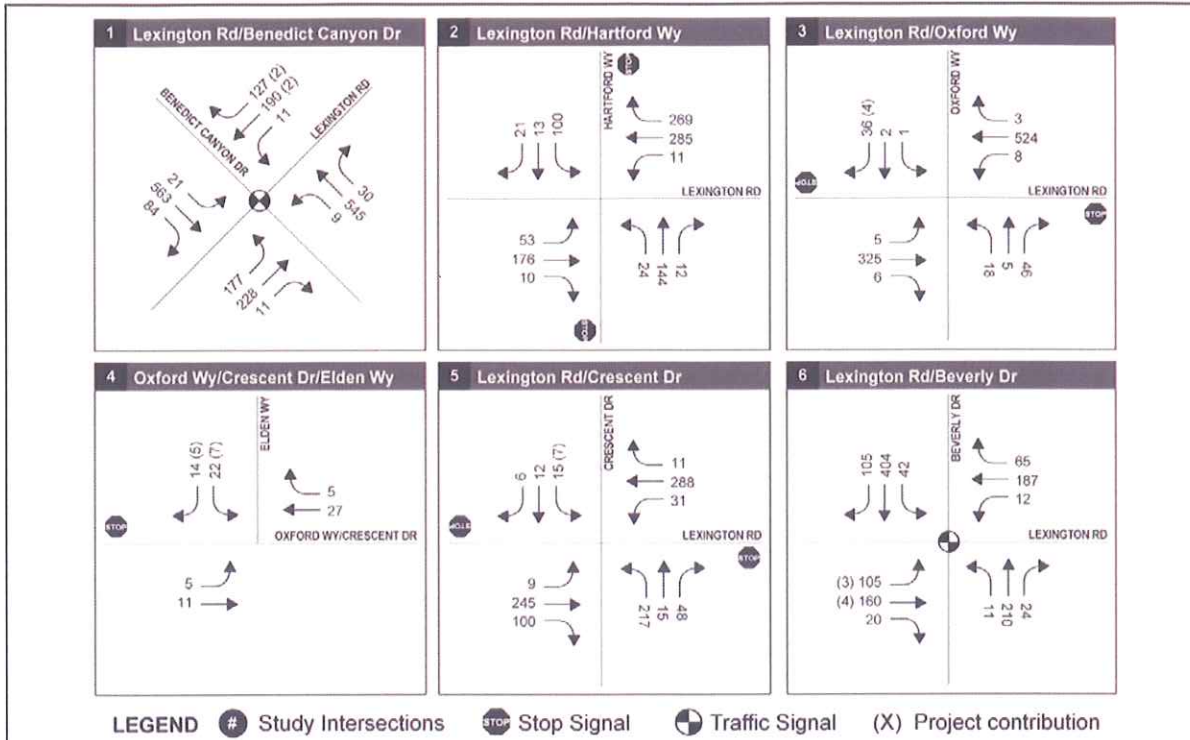


Figure 11 Opening Year (2014) Plus Project Conditions PM Peak Hour Turning Movement Counts

Appendix G

**Virginia Robinson Gardens Infeasibility
Analysis of Traffic Mitigation Memo
[New]**

**APPENDIX G
VIRGINIA ROBINSON GARDENS
INFEASIBILITY ANALYSIS OF TRAFFIC MITIGATION**

Prepared by: County of Los Angeles, Department of Parks and Recreation, Planning Division, 2014.

This analysis addresses the feasibility of reducing the number of vehicle trips for the proposed operation of VRG on Saturdays (40 vehicle trips), to conform to the City standard of no more than a 16% increase in traffic to have a less than a significant impact (20 vehicle trips). The following determinations were made:

1. To make budget on various classes, such as botanical illustration or photography, the minimum number of students is 15. Although students are encouraged to carpool, they typically arrive in separate vehicles, which results in 30 vehicle trips.
2. Special programs held in the Pool Pavilion have a maximum capacity of 49 visitors. These events, now offered during the week, typically sell out. Even if guests would arrive two to a car, this would equal 50 vehicle trips.
3. Off-site parking and shuttle

**Greystone Mansion and Park
905 Loma Vista Drive
Beverly Hills, CA 90210**

Contact: City employee; Ms. Cindy Brynun, BH Recreation and Parks, Senior Recreation Service Supervisor

Greystone parking lot holds 187 vehicles. The parking lot is commonly booked on Saturdays for revenue generating events, such as weddings, car shows and filming. There is a low probability from March to October that the parking lot would be available for VRG use. Whereas, the winter season, there is a higher probability that the parking lot would be available for use. However, the over-riding concern about use of the parking lot by a 3rd party is losing income from a last minute booking because Greystone reserved a date for VRG to use the parking lot. There is also concern about upsetting the neighbors of Greystone if the parking lot is used too often for parking vehicles not associated with attending a Greystone event.

**Beverly Hills Women's Club
1700 Chevy Chase Dr.
Beverly Hills, CA 90120**

Contact: Mumsey Nemeroff, Women's Club President

Beverly Hills Women's Club parking lot holds approximately 30 cars. The Women's club is busiest on weekends, therefore, Saturdays are typically not available for VRG off-site parking. Ms. Nemeroff indicated they cannot afford to give VRG any weekend reservation because it means they would give up potential revenues. Further concern was if they did give VRG a reservation they potentially would lose revenue from last minute bookings. More so, past president Ms. Claudia Deutsch indicated a city ordinance regulating the Women's club actually prohibits them from allowing 3rd party from using their parking lot.

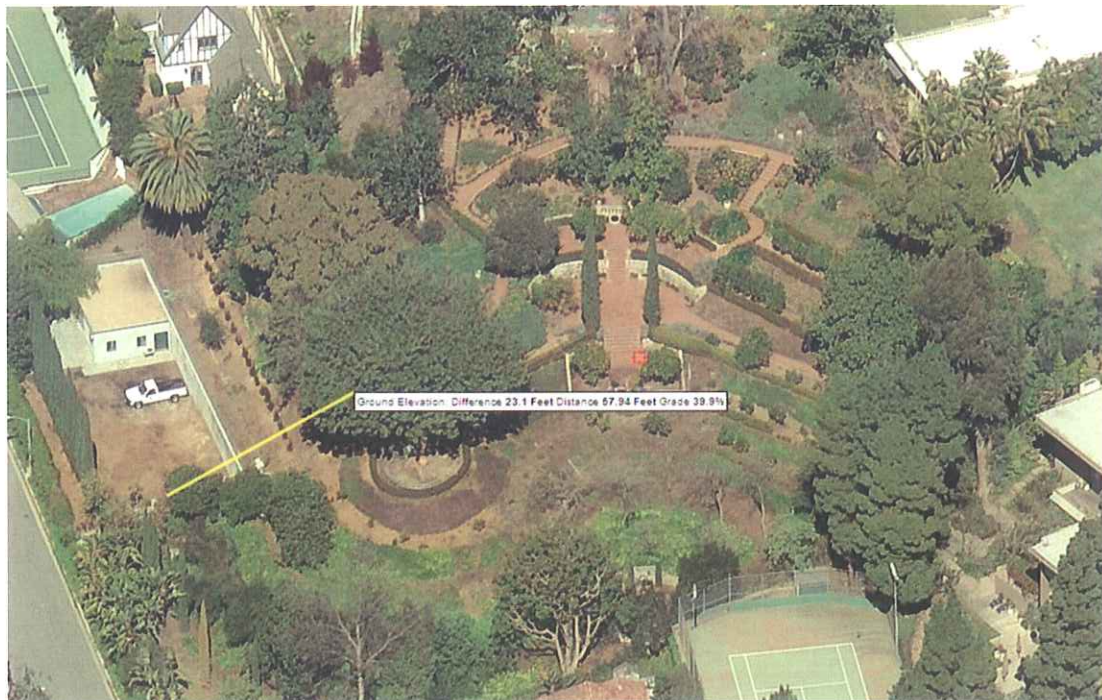
City Parking Structures - Designated Pick-Up

Two City parking structures were visited to determine travel time to VRG, parking availability, and possible pick up locations. Parking would be on a first-come, first-serve basis and if permitted by the City, there would be a designated pick-up location. However, at best, this would provide for an additional 14 visitors to VRG because the largest vehicle that can fit through the VRG front gate is a 14 passenger vehicle. Assuming a van is provided, it is feasible for a shuttle to utilize four of the 20 vehicle trips but this would only assist in the increasing attendance rather than completely solving the problem of allowing the public reasonable access to the site.

The feasibility of making two sequential shuttle trips was researched as well. While this would be physically possible, for a 10:00 am program, the first group would need to be picked up at 9:00 am for a 9:20 am arrival at VRG. A 20 minute interval is needed to allow for a 5 minute grace period and up to 15 minutes to travel and disembark at VRG. The shuttle would return to the pick-up spot at 9:35 for the second group of visitors and arrive at VRG by 9:55 am. Meanwhile, the first group of visitors would need some type of low level program to occupy them while they wait in one area. Current policy is that no visitor walks the park unaccompanied. So because of the waiting period and the extra demand on decent time to monitor the first arrival group and last departure group, two sequential shuttle trips is infeasible.

Cove Way Parking Lot

The Cove Way parking will be limited to the most athletic staff/vendors, not carrying items to the event, such as food, wine, instruments, ice, a screen or projector. Support staff and/or vendors have items to carry in. For instance, musicians have instruments to carry and need a place to park close to the venue. If they park in the Cove Way parking lot or even on Cove Way which has no time limit on parking, they must climb 76 steps to get to the Great lawn and 5 more steps (total 81 steps) to get into the Pool Pavilion. As seen below, the first 68 feet are at a 40% grade.



The distance from Cove Way to the Great Lawn is approximately 300 feet, the length of a football field. Therefore, due to the topography and distance, utilizing the Cove Way parking lot is not feasible for most of the support staff.



Typical Programs

Listed below are examples of programs that could occur on Saturdays but cannot due to exceeding the City limit of 20 vehicle trips on Elden Way.

Art Classes – 58 vehicle trips for minimum enrollment of 15 people

- A minimum of 15 students is required to make budget. If no one carpools, this causes 32 vehicle trips including the instructor.
- On the last day of the program after the final class, a juried exhibit is organized for family and friends. This would be approximately 13 more visitors, generating another 26 vehicle trips

Lecture & Luncheon – 58 to 64 vehicle trips

- Assume 50 guests with some amount of carpooling = 40 vehicle trips
- Normally, tickets to this type of program costs approximately \$60. However, with a 20 vehicle trip restriction, the cost of tickets will have to increase to cover the cost of the programming.
- Each special program requires some or all of the following support:
 - Music (string quartet, band, etc.): 8 to 12 vehicle trips
 - Catering service: 2 to 4 vehicle trips
 - Props: 2 vehicle trips
 - Linens: 2 vehicle trips
 - Ice Delivery: 2 vehicle trips
 - Florist: 2 vehicle trips

TOTAL: 18 to 24 vehicle trips only for support

Saturday Events

- Various types of events are proposed for Saturdays, which include docent led tours and performing arts programs for adults and children.
- The price break for most of these events, which, for a non-profit must be 60/40 profit/expense, is not economically feasible unless attendance is at or close to 100 participants. This is especially true when we offer programs to working families with children at the lowest possible cost to encourage participation. Hence, the more participants the lower the cost of attendance.

Conclusion

If two Saturdays a month are approved, the public would best be served by scheduling multiple uses/programs to maximize their access to VRG. However, reducing the number of vehicle trips from 40 to 20 is infeasible due to the severe restriction it places on the public's ability to access the site and participate in programs.