

DRAFT

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

Lead Agency:

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

July 2022

ECORP Consulting, Inc.
ENVIRONMENTAL CONSULTANTS

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

State Clearinghouse No. 2012091034

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JULY 2022

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1.0 INTRODUCTION

1.1 Background

1.1.1 Introduction

Virginia Robinson Gardens (Gardens) is a unique 6.2-acre publicly accessible historic estate and gardens in the City of Beverly Hills (City) operated and maintained by the Los Angeles County Department of Parks and Recreation (DPR) with support from the Friends of Robinson Gardens, a not-for-profit organization founded in 1982. The property is listed on the National Register of Historic Places, is designated as a California Point of Historical Interest, and is on the City of Beverly Hills Local Register of Historic Properties.

Built in 1911, it was once the residence of Virginia and Harry Robinson (of the Robinson department stores). Shortly before her death in 1977, Mrs. Robinson bequeathed her estate to Los Angeles County. The County works in partnership with the Friends of Robinson Gardens to preserve the estate for the public to enjoy and experience.

The Gardens are home to about 150 bird species and have been designated by the National Wildlife Federation as an official Certified Wildlife Habitat Site. This certification requires that green spaces provide four basic elements that all wildlife need: food, water, cover, and a place to raise young. The Gardens serve as an urban forest, providing valuable air pollution removal and carbon sequestration. The Gardens' trees also shade buildings, provide evaporative cooling, and block high winds. The Gardens also use sustainable practices like water conservation and removal of invasive plants.

The Gardens offer educational programming and tours to children from elementary schools in Beverly Hills as well as schools located in lower-income, underserved communities across Los Angeles County. The Friends of Robinson Gardens offers educational programming and botanical learning for school children, provides docent-led tours, and fundraises to offset costs not covered by taxpayer dollars.

1.1.2 Summary of Previous CEQA Documentation

On June 10, 1980, the Los Angeles Board of Supervisors certified an Environmental Impact Report (1980 EIR) for the Gardens to accompany the land use change from a single-family estate (residential purposes) to a public open space and garden. The 1980 EIR established a detailed schedule limiting the hours of operation and number of daily visitors allowed at the Gardens (Project Site) for guided tours, classes and seminars, and special events, as well as the number of employees at the Project Site. The 1980 EIR included operational regulations for the future use of the Project Site and has served as the governing land use document since that time.

When the 1980 EIR was certified, the Project Site was most valued as an extension of the plant testing program at the Los Angeles County Arboretum and Botanic Gardens. However, since the 1980 EIR was certified, the primary objectives of the Gardens shifted. In 2012, preservation, programming, and public access were the primary goals of the Project Site. To meet these goals, operational changes were

proposed for the Virginia Robinson Gardens. A Supplemental Environmental Impact Report (2014 SEIR) was prepared to analyze the proposed modifications to the operational limitations established in the 1980 EIR. The Final SEIR was certified in 2014 by the Los Angeles County Board of Supervisors. Approval of the 2014 operational changes amended Section 4 of the Friends of Robinson Gardens Support Agreement No. 010158 to reflect the changes to the days and hours of operation to conform with changes described in the Final 2014 SEIR. The 2014 SEIR concluded that there would be a significant and unavoidable impact with respect to traffic when compared to the City's Local Street traffic standards. The additional traffic on Elden Way (on Saturdays) would result in an increase greater than the City's Local Street threshold of 16 percent. A Statement of Overriding Considerations was adopted by the County Board of Supervisors along with certification of the 2014 SEIR.

1.2 Decision to Prepare a Supplement to the Final 2014 SEIR

To ensure the Gardens continue to fulfill the purposes of Virginia Robinson's bequeathment, for the benefit and enjoyment of the general public as an arboretum and botanical garden and to advance science an education of California horticulture, DPR believes that modifying the current hours of operation and limited uses is appropriate. DPR is preparing this SEIR to analyze the potential environmental impacts of the proposed operational changes (Proposed Project) that would meet current objectives of inclusivity and accessibility and adhere to DPR's mission to serve as stewards of parklands, build healthy and resilient communities, and advance social equity and cohesion.

Currently, the Virginia Robinson Gardens operate on a reservation basis for all visitors and is open Monday through Saturday. The current hours of operation are 9:30 a.m. to 4:00 p.m. year-round. All visitors must make a reservation and there is a limit of 100 visitors per day. No street parking is allowed on Elden Way. There is also a limit of four special use events per year as identified in the 2014 SEIR. These special use events are limited in the number of attendees. Their purpose is to generate funds to reduce taxpayer dollars needed to support the Gardens.

The proposed change in operating hours of 9:30 a.m. to sunset Monday through Sunday would enable the Gardens to serve the needs of more school children and the general public. All visits would continue to be by reservation only with no street parking or buses on Elden Way. All cars must park onsite for smaller events. The proposed operational changes also include up to 100 additional visitors per day, excluding any staff, volunteers, or security on site. The number of special use events would increase to no more than 24 per year with the same restrictions. A complete description of the Proposed Project is included in Section 2.4 of this SEIR.

The proposed operational changes would result in technical changes to the 2014 SEIR that would require additional environmental review and would result in new significant impacts. The proposed operational changes would not require a major revision of the previous 2014 SEIR, therefore, DPR has determined that a supplement to the SEIR is the appropriate CEQA document to be prepared (CEQA Guidelines Section 15163). CEQA Guidelines Section 15163 allows the lead agency (County) to choose to prepare a supplement to an EIR rather than a subsequent EIR if only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation. Pursuant to CEQA Guidelines Section 15163(b): the supplement to the EIR need contain only the information necessary to

make the previous EIR adequate for the project as revised. A supplement to an EIR may be circulated for public review by itself without recirculating the previous Draft or Final EIR.

The purpose of the SEIR is to provide local decision-makers and the public with an objective analysis of the potential environmental consequences of the Proposed Project. This SEIR provides a discussion of the environmental impacts related to the operational changes at the Gardens. In addition, since certification of the previous SEIR in 2014, the CEQA Guidelines have been revised to included analysis of energy, tribal cultural resources, wildfire, and vehicle miles traveled (CEQA Guidelines Section 15064.3). The analysis in Section 3 of this this SEIR found that the significance of most of the impacts remained the same as those discussed in the certified 2014 Final SEIR. A discussion of the proposed operational changes is included in Section 2.4 of this SEIR.

1.3 Availability of the SEIR/Public Review Process

In accordance with the CEQA Guidelines (Section 15082), the County, as Lead Agency, prepared a Notice of Preparation (NOP) for an SEIR on the Proposed Project. A copy of the NOP is provided in Appendix A. The NOP was distributed for review and comment to the State Clearinghouse and interested parties for a 30-day comment period (November 16, 2021 to December 16, 2021). A public notice was also published in the *Beverly Hills Courier* newspaper on November 5, 2021. A virtual community meeting was held on November 15, 2021. Letters received from agencies and the general public during the scoping period are provided in Appendix A.

This Draft SEIR is now available for public review electronically on DPR's website: https://parks.lacounty.gov/environmental-documents/.

The Draft SEIR is also available for review at the following physical locations:

City of Beverly Hills Public Library
444 N. Rexford Drive
Beverly Hills, California 90210

Virginia Robinson Gardens
1008 Elden Way
Beverly Hills, California 90210
(Please call (310) 550-2065 to make an appointment)

County of Los Angeles
Department of Parks and Recreation
1000 S. Fremont Avenue
Unit #40 A-9 West, 3rd Floor
Alhambra, California 91083
(Please call (626) 588-5317 to make an appointment)

A period of 45 days has been established for public review of the Draft SEIR for the Proposed Project. Agencies, organizations, and individuals are invited to comment on the information presented in the Draft SEIR during this period. Specifically, comments are requested on the scope and adequacy of the environmental analysis presented in this Draft SEIR and not on the prior 2014 SEIR. All comments on the Draft SEIR should be sent to the following contact:

Ms. Jui Ing Chien, Park Planner
County of Los Angeles Department of Parks and Recreation
1000 S. Fremont Avenue
Unit #40 A-9 West, 3rd Floor
Alhambra, California 91083
Telephone: (626) 588-5317
Email: jchien@parks.lacounty.gov

Following the 45-day public review period, DPR will prepare responses to all comments and will compile these comments and responses into a Final SEIR. The County of Los Angeles Board of Supervisors will consider the information in the Draft and Final SEIR during project review and when making a decision on the Proposed Project. The Final SEIR will need to be certified as complete by the Board of Supervisors prior to making a decision on the Proposed Project.

1.4 Documents Incorporated by Reference

An EIR may incorporate portions or all of any publicly available document by reference (CEQA Guidelines Section 15150). This Draft SEIR, where applicable, incorporates by reference the certified *2014 SEIR Proposed Operational Changes to the Virginia Robinson Gardens* (County of Los Angeles 2012; 2014a; 2014b). The existing conditions and impact analysis that apply to this SEIR are therefore referenced rather than repeated. In addition, this Draft SEIR includes new analysis from two new technical reports:

- *Traffic Impact Study – Virginia Robinson Gardens* (July 2022) (Appendix F)
- *Historical Resources Memorandum for Proposed Operational Changes at the Virginia Robinson Gardens in Beverly Hills* (June 2022) (Appendix C)

New modeling was performed for air quality, greenhouse gas emissions, energy, and noise (Appendices B and D). The new information in these reports and modeling results reflects changes in the circumstances or contains information that was not known or could not have been known with the exercise of reasonable diligence at the time the 2014 Final SEIR was certified.

The following documents are available at the website link below and at the Los Angeles County Department of Parks and Recreation, 1000 S. Fremont Avenue, Unit #40 A-9 West, 3rd Floor, Alhambra, California 91083, and are hereby incorporated by reference into this SEIR:

- *Draft Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (September 2012)*
- *Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (May 2014)*
- *Recirculated Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (July 2014)*

Documents are available at: https://parks.lacounty.gov/virginia-robinson-gardens-proposed-operational-changes-to-the-virginia-robinson-gardens-final-supplemental-eir/.

2.0 PROJECT DESCRIPTION

2.1 Project Location and Setting

Virginia Robinson Gardens is located at 1008 Elden Way in the City of Beverly Hills, Los Angeles County, California on a 6.2-acre parcel (Figure 2-1). The Project Site is located within a fully developed area of the City of Beverly Hills on County property, nestled at the top of a hill above Sunset Boulevard at the end of a cul-de-sac (Elden Way). The property is a terraced, irregularly shaped parcel bound by residential uses on all sides. The Project Site features the main residence, pool pavilion, trees, dense vegetation, and other landscape and built features (Figure 2-2).

2.2 Existing Operational Policies and Procedures at Virginia Robinson Gardens

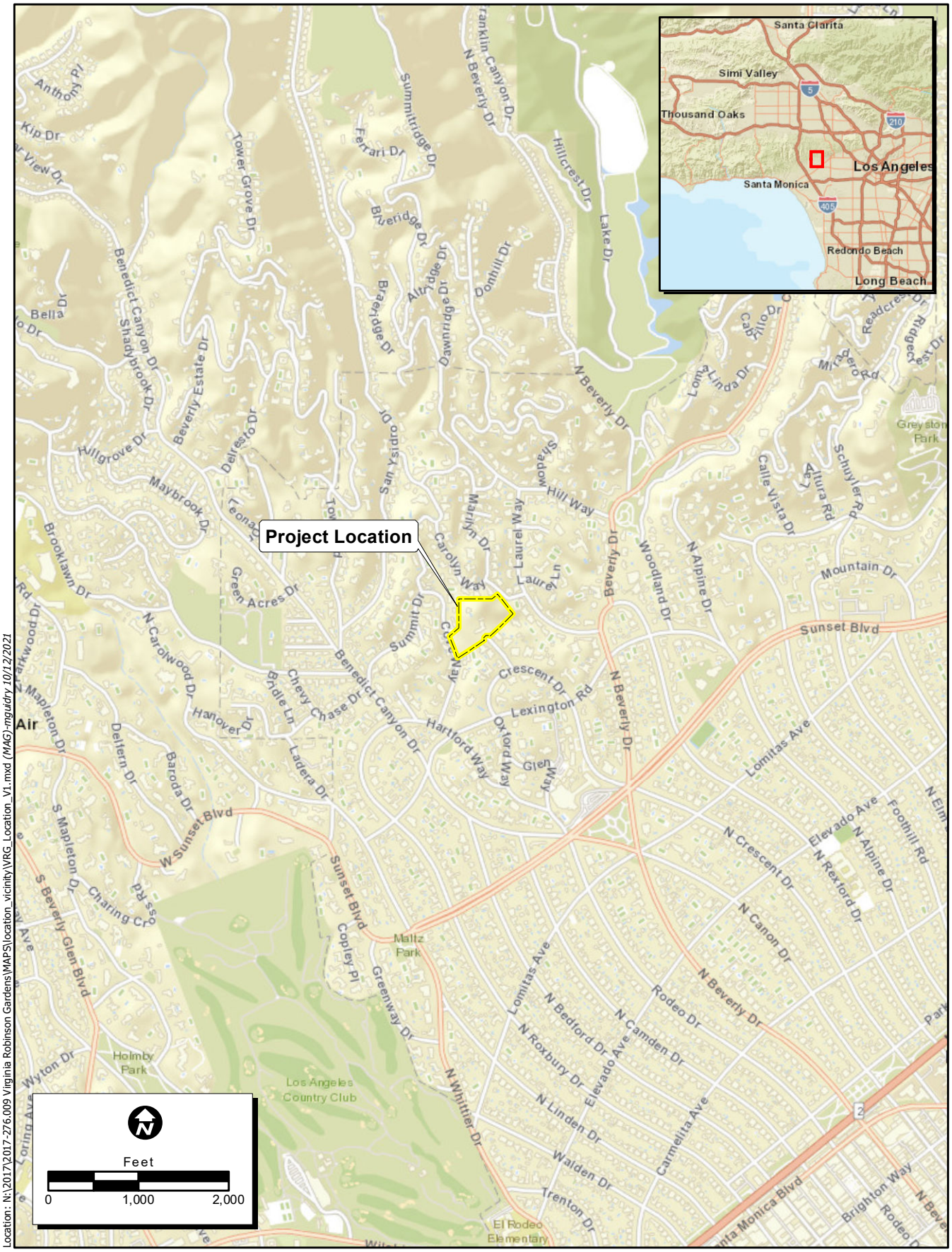
The existing operational policies and procedures practiced at the Virginia Gardens would continue to be applied to the Proposed Project. These policies and procedures are included below for informational purposes.

2.2.1 Visiting Virginia Robinson Gardens is by Reservation or Invitation Only

Daily visitation for garden tours is limited to 100 visitors per day. Visitors must make a parking and guest reservation so that the Gardens know when they will come and how many cars and people to expect. No walk-ins are allowed. Visitors are led through the Gardens by a trained docent on a 90-minute walking tour and are not allowed to tour the property unattended. Visitors must immediately leave following the tour/event. Street parking on Elden Way is not allowed. Parking attendants monitor the gates on Elden Way and visitors are directed to park on the property. The current yearly average of visitors to the Gardens is under 5,000 which equates to approximately 20 visitors per day.

2.2.2 Daily Visitor Tours are Scripted and Run 90 Minutes

Each tour is led by a volunteer docent. Children attending the Children's Science Program spend two and a half hours with a children's docent and use the Gardens as an outdoor classroom to study plants and animals. They eat lunch on the tennis court prior to returning to the school. Educational events are held in the pool pavilion and are typically followed by sit-down luncheon and further discussion with the presenter. Types of other events include botanical illustration, nature photography, bird watching, classes on vegetable gardening and plant collecting, forest bathing, yoga, and meditative walks.



Map Date: 10/12/2021
Base Source: Esri World Street map

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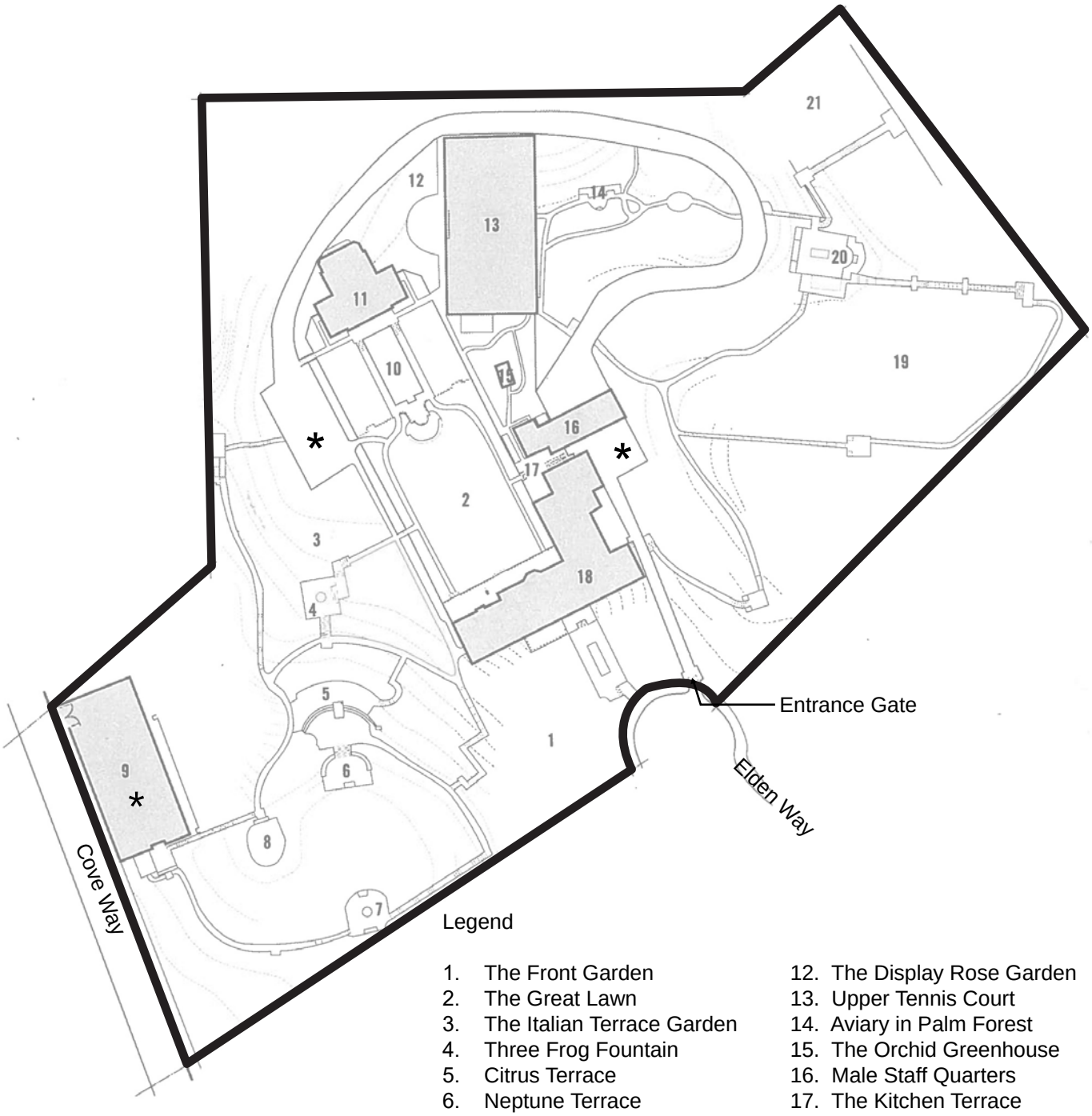
Figure 2-1. Project Location

2017-276.009 Virginia Robinson Gardens



***Source*:** ATKINS 2014, Beverly Hills' First Estate, The House and Gardens of Virginia & Harry Robinson By: Timothy Lindsay, Marcella Ruble, and Evelyn Carlson (Edited by Maralee Beck and Jamie Wolf).

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Figure 2-2. Virginia Robinson Gardens Property Map

2017-276.009 Virginia Robinson Gardens

2.2.3 Special Use Events

The average attendance per Special Use Event is 350 guests. The following good neighbor policies are practiced when the parking for Special Use Events exceeds available parking:

- A parking/transportation plan is developed to use either valet or shuttle vans to bring guests to the Gardens from off-site parking areas and parking permits are requested from the City of Beverly Hills.
- Deliveries are scheduled by time and vehicle size. Vehicles that do not fit down the driveway are off-loaded on streets other than Elden Way.
- The Gardens has preferred rental companies that know the property and the physical site restrictions and therefore use smaller trucks to bring rentals for event set-up.
- Sensitivity to the effect on the neighbors and the protection of the artifacts on the property itself are carefully considered when planning each event.
- All City of Beverly Hills ordinances for parking and time limits for events are adhered to for each event.
- Parking monitors are in place at the front gate during the load in and load out for each event to assure compliance by participants.
- Prior to each Special Use Event, the event operator and Gardens staff would coordinate with the Parks Bureau of the Los Angeles County Sheriff's Department in its preparation and implementation of an Operations Plan for police protection services to be provided by the County to supplement the private security being provided by the event operator.
- There are cameras and video surveillance monitors throughout the property.

Examples of past special use events include Garden Tour, Patron Party, El Nido Garden Gala, Gold meets Golden, birthdays and other family celebrations, memorial services, opera in the garden, and film screenings.

2.3 Project Objectives

The mission statement of the Virginia Robinson Gardens is as follows:

> 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.

The mission of the Los Angeles County Department of Parks and Recreation is as follows:

> Serve as stewards of parklands, build healthy and resilient communities, and advance social equity and cohesion.

To this end, the primary goal of the Proposed Project is to increase public access to the Virginia Robinson Gardens and enable more Los Angeles County residents, especially families and children, to enjoy and

experience the Gardens. Specifically, the Proposed Project has been developed to meet the following objectives:

- Implement operational changes to fulfill the missions of the Virginia Robinson Gardens and the Los Angeles County Department of Parks and Recreation.
- Increase the daily operating hours so that more visitors can be accommodated.
- Increase the number of days per week that the project site is open to the public.
- Increase visitor access each day for seminars and classes.
- Allow for an increase in the number of special events at the Gardens to help with fundraising to support operations and programming of the Gardens.
- Promote the use of alternative modes of transportation to the Gardens.

2.4 Project Description

The operational changes propose to expand the level of public use of the Virginia Robinson Gardens by extending the hours of operation and days, types of programs, and use of public transportation. Mrs. Robinson left a public garden to the community and a large number of historical archives. The Proposed Project would increase equitable access to the larger community to enjoy these assets. In addition, the increased number of Special Use Events would generate critical revenue for the Gardens, to offset the costs to operate and maintain this historic landmark.

Table 2-1 shows the operational activities (existing condition) approved in 2014 and the proposed operational changes. The Proposed Project does not include any ground disturbing activities normally associated with grading, demolition, or construction.

Table 2-1. Proposed Operational Changes

	Existing	Proposed
Days Open and Hours	• Monday to Saturday; 6 days per week. • 9:30 a.m. to 4:00 p.m.	• Monday to Sunday; 7 days a week. • 9:30 a.m. to sunset (as common for other County parks).
Number of Patrons in Attendance	• With advance reservation: • Up to 100 visitors* per day of docent tours, seminar/classes, or commercial filming (video only, no motion picture) or a combination of any of these activities. **The visitor maximum does not include staff, volunteers, or security.*	• With advance reservation: • Up to 200 visitors* per day for docent tours, seminar/classes, or commercial filming (video only, no motion picture) or a combination of any of these activities. **The visitor maximum does not include staff, volunteers, or security.*
Types of Events	• Offer children's programming. • Schedule staff and public programming such as temporary exhibits, health and physical fitness	• In addition to the existing type of events listed to the left, propose adding private and family ceremonies such as weddings.

Table 2-1. Proposed Operational Changes

	Existing	Proposed
	activities, painting, wine and cooking classes etc. • Institute subsidized musical and performing arts programs, and movie screenings. • Subject matter for events to be determined at the discretion of the Superintendent.	
Special Uses	• 4 special use events per year. Tickets are sold to regulate the number of visitors to ensure safety and a quality experience.	• Up to 24 special use events per year; up to 4 events per month. Tickets would be sold to regulate the number of visitors to ensure safety and a quality experience.
Parking	• With advance reservation: • Parking on property (35 spaces available). • No parking permitted on Elden Way. • For special events, offsite parking is made available, so guests are shuttled to the estate. Valet service is also utilized. • Visitor drop-off and walk-ins allowed. • All events require a parking/transportation plan. • Promote the use of shuttle service to reduce the number of trips to the Gardens.	• In addition to existing parking conditions listed to the left, promote the use of public transit and ridesharing such as Lyft/Uber.

2.4.1 Days Open and Hours

DPR proposes that the Gardens be open from 9:30 a.m. to sunset. Sunset is typically 7 to 8 p.m. in the summer and 5 to 6 p.m. in the winter. This means the Gardens would be open for up to 10.5 hours in the summer and 8.5 hours in the winter. Current hours are from 9:30 a.m. to 4:00 p.m., which translates to a duration of 6.5 hours. The proposed increase in the number of visitors would be spread over the increased hours of operations.

The current operational restrictions of 6.5 hours a day, six days a week limits the Gardens ability to fulfill the mission of Virginia Robinson's bequeathment to the County. By allowing the Gardens to welcome the public until sunset, as most other public gardens and parks do, students and the public would have greater access. The Gardens would be able to offer science and botanical education to more students from all schools, including Title I schools. Title I is a Federal Entitlement Program designed to meet the needs of children who come from low-income households. The program supplies supplemental funds to school districts with high concentration of poverty to support the school's educational goals. In Los Angeles County there are approximately 1,922 Los Angeles Unified Schools that currently qualify for this program. The Gardens developed and continues to deliver the educational programming.

With the proposed modifications, the Gardens would be open for up to four more hours in the summer and two more hours in the winter. This would allow the Gardens to develop an afterschool program for children. It would also mean that families would be able to visit the Gardens after school, in the afternoon, and late in the afternoon after work, daylight permitting. With longer hours available, the increase in visitors would be spread across the day.

2.4.2 Number of Patrons in Attendance

Public tours are at designated times only. Two tours are typically scheduled per day, one in the morning and one in the afternoon. Each tour is led by a trained docent(s). The Gardens are currently limited to 100 people per day, unless there is one of the four permitted Special Use Events. Tours are limited to 15 to 20 people for the best guest experience. This allows visitors to walk the garden paths comfortably and hear the docents.

The Proposed Project would increase the number of daily visitors from 100 to 200. The proposed increase in the number of visitors would be spread over the increased hours of operations. The current yearly average of visitors to the Gardens is under 5,000 which equates to approximately 20 visitors per day. Visits to the Gardens would continue to be by reservation only, with no walk-ins allowed. For Special Use Events, tickets would be sold to regulate the number of visitors to ensure safety and a quality experience; additional information on Special Use Events is provided in Section 2.4.5.

2.4.3 Types of Events

With the Proposed Project the Gardens would continue to offer daily programming, including children's programming, temporary exhibits, health and physical fitness activities, painting, wine and cooking classes etc. Subsidized musical and performing arts programs would be offered as well as movie screenings. The subject matter for events would continue to be determined at the discretion of the Superintendent. The Proposed Project would add family ceremonies such as weddings subject to the Special Use Event requirements described in Section 2.4.5.

2.4.4 Special Use Events

The Proposed Project includes up to 24 special use events per year (up to 4 events per month). Four special use events are allowed currently. The Gardens conform to Beverly Hills City ordinances and would continue to stop all amplified music at 10 p.m.

The proposed increase in the number of special events would improve the fundraising that supports the educational programs and maintenance of the Gardens. Private event rental is a vital means for raising funds to sustain the operations of facilities like the Virginia Robinson Gardens and lessens the tax-payer burden. Renting for private events is a normal operation and legal under the 501(c)(3) charitable tax designation, does not change a venue's tax status, and reflects the values of Virginia Robinson's bequeathment.

2.4.5 Parking

Parking on the property will remain the same (35 spaces available) and there will continue to be no parking on Elden Way. Parking is reserved when visitors make reservations for a tour. Smaller events can accommodate up to 35 cars with stacked parking. For larger events, valet service is required. The event must receive a Valet Permit and Special Event Permit from the City of Beverly Hills. A Street Parking Permit is issued by the City of Beverly Hills. For Special Use Events, the Gardens will continue to promote the use of shuttle service from offsite to reduce the number of trips and all events will require a parking/transportation plan. Special Use Event parking management is based on the total number of guests expected.

Vendors and staff for Special Use Events are required to park at a designated site and are shuttled to the Gardens. Specifically, all vendor cars can be parked at Greystone Mansion and Park located at 905 Loma Vista Drive, Beverly Hills, CA 90210, approximately 1.5 miles from the Gardens. Vendors may also park in the Cove Way parking lot and walk up the back way through the property.

The load in and load out procedures for Special Use Events is tightly regulated and scheduled by the County and the Friends of the Robinson Gardens working together with the renting organization. This coordination manages the activity on the street as well as protects the historic property and neighboring residences from damage. Vendors are assigned arrival and load out times. Prior to the event, they receive a packet of information on the dimensions of the driveway and the location of offsite parking as well as other information. There are preferred vendors that staff has trained. The largest vehicles are required to park off site. Smaller trucks then off load and deliver their contents to the property. The same program is used for loading out.

Gardens staff park their cars in the parking lot off the entrance at 1028 Cove Way. There are eight spaces available. Occasionally, staff use the upper parking lot when there are no tours scheduled for the day.

3.0 ENVIRONMENTAL REVIEW

3.1 Introduction

This section provides a discussion of the existing environment within and surrounding the Virginia Robinson Gardens (Gardens) followed by a summary of prior environmental review and an analysis of the impacts of the Proposed Project.

3.2 Aesthetics

3.2.1 Environmental Setting

The aesthetics environmental setting for the Gardens remains similar to that discussed in the *2012 Draft SEIR* and *2014 Final SEIR Proposed Operational Changes to the Virginia Robinson Gardens* (County of Los Angeles 2012; 2014a; 2014b). The Project Site is located within a fully developed area of the City of Beverly Hills (City) at the top of a hill above Sunset Boulevard. The approximately 6.2-acre Project Site is a terraced, irregularly shaped parcel bound by single-family residential uses on all sides. The Project Site features the main residence, pool pavilion, trees, and dense vegetation (Figure 2-2).

The surrounding residential streets feature extremely dense landscaping along the privately-owned properties that include hedges, shrubs, and mature trees. In addition, some properties are bordered by stone walls and gates. Therefore, any views of the Project Site from public streets are obstructed, except from the terminus of the Elden Way cul-de-sac at the entrance of the Project Site.

3.2.1.1 Caltrans California Scenic Highways Program

The California Scenic Highway Program protects and enhances the scenic beauty of California's highways and adjacent corridors. A highway can be designated as scenic based on how much natural beauty can be seen by users of the highway, the quality of the scenic landscape, and if development impacts the enjoyment of the view (California Department of Transportation [Caltrans] 2019). The closest state highway is State Route 2 (SR-2), Santa Monica Boulevard, located approximately 1.3 miles south-southeast of the Project Site. SR-2 is not a state-designated scenic highway, and no portion of the Project Site can be seen from SR-2. SR-1, Pacific Coast Highway, is located approximately 7 miles southwest of the Project Site and is not officially designated as a scenic highway. As with SR-2, no views of the Project Site can be seen from any portion of SR-1, and SR-1 cannot be seen from the Project Site.

3.2.1.2 Los Angeles County General Plan 2035

The Los Angeles County General Plan 2035 was adopted by the Los Angeles County Board of Supervisors on October 6, 2015, to provide the policy framework for the growth and development of the unincorporated County and County properties through 2035 (County of Los Angeles 2015). The Land Use Element provides strategies and planning tools to facilitate and guide future development and revitalization efforts. The Conservation and Natural Resources Element serves as the policy guide for conservation of scenic resources in the County.

3.2.1.3 City of Beverly Hills General Plan

The City of Beverly Hills General Plan, originally adopted in 1977 and amended and readopted in 2010, serves as a comprehensive, long-term plan for future development in the City (City of Beverly Hills 2010). The Open Space Element of the General Plan guides the maintenance and preservation of natural resources, open space, scenic resources, recreation and park lands in the City. The Open Space Element includes the following goals and policies related to scenic resources:

Goal OS-6: Visual Resource Preservation. Maintenance and protection of significant visual resources and aesthetics that define the City.

Policy OS-6.1: Protection of Scenic Views. Seek to protect scenic views and vistas from public places including City landmarks, hillside vistas, and urban views of the City.

3.2.2 Prior Environmental Review

3.2.2.1 Previous Environmental Analysis

The aesthetics impacts associated with the 2014 operational changes at the Virginia Robinson Gardens were evaluated in the following documents:

- *Draft Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (September 2012) – pages 18 through 51*
- *Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (May 2014)*
- *Recirculated Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (July 2014)*

3.2.2.2 Previously Identified Significant Project Impacts

The 2014 SEIR did not identify any significant project impacts to aesthetics associated with the previous operational changes at the Gardens.

3.2.2.3 Previously Identified Mitigation Measures

There were no mitigation measures identified in the 2014 SEIR because the impacts were found to be less than significant.

3.2.3 Environmental Impacts

The Proposed Project would continue to maintain and preserve the Virginia Robinson Gardens and its historic structures and gardens, as discussed in the 2012 *Draft SEIR* and 2014 *Final SEIR Proposed Operational Changes to the Virginia Robinson Gardens* (September County of Los Angeles 2012; 2014a; 2014b). The Proposed Project would not construct new buildings, alter existing buildings, change

landscaping, or alter the visual aspects of the Project Site in any way. As such, the Proposed Project would not degrade the visual character or quality of the site or its surroundings.

The Proposed Project would increase Special Use Events from 4 per year to 24 per year, and evening events would be offered that could include temporary outdoor lighting. The lighting would be directed toward a specific area of the Project Site, and since the Project Site and the other properties in the area are located on large parcels, the amount of light spillage onto neighboring residences would be limited. In addition, the dense landscaping surrounding the Project Site would block the majority of the nighttime lighting. This lighting would also be consistent with the lighting elements of adjacent neighborhood (as hosting special use events is commonplace in this neighborhood and throughout the City of Beverly Hills) and would not create a significant new source of light.

The increased number of visitors moving through the surrounding neighborhood would create a new, short-term, visual element to the project area. However, all daily visitors to the Gardens would continue to be by reservation only (up to 200 per day). All vehicles would park within the onsite 35 parking spaces, with no street parking or bus parking on Elden Way. Smaller events can accommodate up to 35 cars with stacked parking. Currently, during Special Use Events, vehicles arrive at the Project Site and cars are parked in the surrounding neighborhood (by valet); this would continue with the Proposed Project. This is consistent with events already held in the area by surrounding residences and would not be a condition unique to the Proposed Project Site.

Due to the short-term and minor nature of this new visual element, the Proposed Project would not substantially degrade the existing visual character or quality of the project area, resulting in a less than significant impact.

3.2.4 Mitigation Measures

Impacts would be less than significant therefore mitigation measures are not required.

3.2.5 Residual Impacts After Mitigation

Less than significant impacts would occur.

3.3 Agriculture/Forestry Resources

3.3.1 Environmental Setting

The agriculture/forestry resources for the proposed operational changes at the Gardens are the same as those identified in the previously prepared 2014 SEIR (County of Los Angeles 2012; 2014a; 2014b). As discussed in the 2012 Draft SEIR, there are approximately 39,812 acres of farmland in Los Angeles County. However, the Project Site is not located on or adjacent to any farmland including Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The Project Site is not currently protected under the Williamson Act or zoned for agricultural uses, nor has it been used for strictly agricultural purposes since the Robinsons purchased the property in the early 1900s. While the Project Site is currently developed with acres of manicured gardens that surround the main residence and pool pavilion, the existing

vegetation is not considered to be a forestry resource per the definition of Public Resources Code Section 12220(g), timberland as defined by Public Resources Code Section 4526, or timberland zoned Timberland Production per Government Code Section 51104(g). The Project Site is located in a highly developed, residential neighborhood, and the Proposed Project would not involve any construction activities, including grading, or changes in land use.

3.3.2 Prior Environmental Review

3.3.2.1 Previous Environmental Analysis

The agriculture/forestry resources impacts associated with the 2014 operational changes at the Virginia Robinson Gardens were evaluated in the following documents:

- *Draft Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (September 2012) – pages 51 through 53*
- *Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (May 2014)*
- *Recirculated Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (July 2014)*

3.3.2.2 Previously Identified Significant Project Impacts

The 2014 SEIR did not identify any significant project impacts to agriculture/forestry resources associated with the previous operational changes at the Virginia Robinson Gardens.

3.3.2.3 Previously Identified Mitigation Measures

There were no mitigation measures identified in the 2014 SEIR because the impacts were found to be less than significant.

3.3.3 Environmental Impacts

As discussed above, the Project Site is located in a highly developed, residential neighborhood, and no farmland or forestry resources are located on the Project Site or vicinity. The Proposed Project would not involve any construction activities, including grading, or changes in land use. As such, implementation of the Proposed Project would have no impact on agriculture and forestry resources.

3.3.4 Mitigation Measures

Impacts would be less than significant therefore mitigation measures are not required.

3.3.5 Residual Impacts After Mitigation

Less than significant impacts would occur.

3.4 Air Quality

3.4.1 Environmental Setting

The City of Beverly Hills is located within Los Angeles County. The California Air Resource Board (CARB) has divided California into regional air basins according to topographic features. The City of Beverly Hills portion of Los Angeles County is located in a region identified as the South Coast Air Basin (SoCAB). The SoCAB occupies the non-desert portions of Los Angeles, Riverside, and San Bernardino counties and all of Orange County. The air basin is on a coastal plain with connecting broad valleys and low hills and is bounded by the Pacific Ocean on the southwest, with high mountains forming the remainder of the perimeter. The mountain ranges to the east affect the diffusion of pollutants by inhibiting the eastward transport of pollutants. Air quality in the SoCAB generally ranges from fair to poor and is similar to air quality in most of coastal Southern California. The entire region experiences heavy concentrations of air pollutants during prolonged periods of stable atmospheric conditions.

Both the U.S. Environmental Protection Agency (USEPA) and CARB have established ambient air quality standards for common pollutants. These ambient air quality standards are levels of contaminants representing safe levels that avoid specific adverse health effects associated with each pollutant. The ambient air quality standards cover what are called "criteria" pollutants because the health and other effects of each pollutant are described in criteria documents. The six criteria pollutants are ozone (O_3), carbon monoxide (CO), particulate matter (PM), nitrogen oxides (NO_x), sulfur dioxide (SO_2), and lead. Areas that meet ambient air quality standards are classified as attainment areas, while areas that do not meet these standards are classified as nonattainment areas. The portion of Los Angeles County encompassing the City of Beverly Hills and the Project Site is designated as a nonattainment area for the federal O_3 and fine particulate matter ($PM_{2.5}$) standards and is also a nonattainment area for the state standards for O_3, $PM_{2.5}$ and coarse particulate matter (PM_{10}) (CARB 2019).

The local air quality regulating authority in Los Angeles County portion of SoCAB, including the Project Site, is the South Coast Air Quality Management District (SCAQMD). The SCAQMD's primary responsibility is ensuring that the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) are attained and maintained in the Los Angeles County portion of the SoCAB. The SCAQMD is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants, inspecting stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle emissions, and conducting public education campaigns, as well as many other activities.

3.4.2 Previous Environmental Review

Air quality impacts associated with the 2014 operational changes at the Virginia Robinson Gardens were evaluated in the following documents:

- *Draft Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (September 2012) pages 53 through 57*

- *Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (May 2014)*
- *Recirculated Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (July 2014)*

3.4.2.1 Previously Identified Significant Project Impacts

The 2014 SEIR did not identify any significant project impacts to air quality associated with the proposed operational changes and therefore, no mitigation measures were required.

3.4.2.2 Previously Identified Mitigation Measures

There were no mitigation measures identified in the 2014 SEIR because the impacts were considered less than significant.

3.4.3 Environmental Impacts

3.4.3.1 Construction Impacts

The Project is proposing to expand the use of the Gardens to increase public access and benefit by extending the hours of operations, increasing the types of programs offered, and increasing the number of daily visitors. No construction is proposed for the Project. Therefore, no impact would occur.

3.4.3.2 Operations Impacts

Air Quality Plan

Air quality plans are prepared to accommodate growth, reduce the high levels of pollutants within jurisdictional areas, return clean air to the region, and minimize the impact of reduced air quality on the economy. The Project Site is located within the SoCAB, which is under the jurisdiction of the SCAQMD. The SCAQMD is required, pursuant to the federal Clean Air Act (CAA), to reduce emissions of criteria pollutants for which the SoCAB is in nonattainment. In order to reduce such emissions, the SCAQMD drafted the 2016 Air Quality Management Plan (2016 AQMP). The 2016 AQMP establishes a program of rules and regulations directed at reducing air pollutant emissions and achieving state (California) and national air quality standards. Projects that are consistent with the employment and population growth projected by the SCAQMD would not conflict with or obstruct implementation of the 2016 Air Quality Management Plan.

The Proposed Project would not affect population growth or substantially increase employment growth as the Project is only proposing to increase the number of Special Use Events occurring each year and the number of daily visitors. Additionally, the Project does not propose any construction and operational emissions attributed to the increased activity on the Project Site would be negligible and below the SCAQMD thresholds (Table 3.4-1).

Regional Operational Significance Analysis

Implementation of the Project would result in long-term operational emissions of criteria air pollutants such as PM_{10}, $PM_{2.5}$, CO, and SO_2 as well as O_3 precursors such as reactive organic gases (ROGs) and NO_X. Criteria air pollutant emissions were modeled using the California Emissions Estimator Model (CalEEMod), version 2020.4.0. CalEEMod is a statewide land use emissions computer model designed to quantify potential criteria pollutant emissions associated with both construction and operations from a variety of land use projects. Long-term operational emissions as a result of the Proposed Project would mainly be attributed to the proposed increase in daily visitors and the number of Special Use Events. It is noted that the increase in special use events, from 4 to 24, has the potential to increase area and energy source emissions, however; this increase would be negligible and was not accounted for in CalEEMod. Operational emissions attributable to the Project are identified in Table 3.4-1 and compared to the operational significance thresholds promulgated by the SCAQMD. As shown in Table 3.4-1, the Project's emissions would not exceed any SCAQMD thresholds for any criteria air pollutants during operation as a result of increased visitors. This impact is less than significant.

Table 3.4-1. Operational-Related Emissions (Regional Significance Analysis)

Emission Source	Pollutant (pounds per day)					
	ROG	**NOx**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Summer Emissions						
Area	0.00	0.00	0.00	0.00	0.00	0.00
Energy	0.00	0.00	0.00	0.00	0.00	0.00
Mobile	0.31	0.32	3.22	0.00	0.72	0.19
Total:	**0.31**	**0.32**	**3.22**	**0.00**	**0.72**	**0.19**
SCAQMD Regional Significance Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Exceed SCAQMD Regional Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Winter Emissions						
Area	0.00	0.00	0.00	0.00	0.00	0.00
Energy	0.00	0.00	0.00	0.00	0.00	0.00
Mobile	0.30	0.34	3.14	0.00	0.72	0.19
Total:	**0.30**	**0.34**	**3.14**	**0.00**	**0.72**	**0.19**
SCAQMD Regional Significance Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Exceed SCAQMD Regional Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod version 2020.4.0. Refer to Appendix A for Model Data Outputs.
Notes: Daily vehicle trips provided by KOA (2022; Appendix F).

Localized Operational Significance Analysis

According to the SCAQMD localized significance threshold methodology, localized significance thresholds (LSTs) would apply to the operational phase of a proposed project only if the project includes stationary sources (e.g., smokestacks) or attracts heavy-duty trucks that may spend long periods queuing and idling at the site (e.g., warehouse or transfer facilities). The Proposed Project does not include such uses. Therefore, in the case of the Proposed Project, the operational LST protocol is not applied. This impact is less than significant.

Operational Air Contaminants

Operations of the Proposed Project would not result in the development of any substantial sources of air toxics. There are no stationary sources associated with the operations of the Project; nor would the Project attract additional mobile sources that spend long periods queuing and idling at the Project Site. Onsite Project emissions would not result in significant concentrations of pollutants at nearby sensitive receptors. The Project would not have a high carcinogenic or non-carcinogenic risk during operation. As such, the impact is less than significant.

Carbon Monoxide Hot Spots

It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when idling at intersections. Concentrations of CO are a direct function of the number of vehicles, length of delay, and traffic flow conditions. Under certain meteorological conditions, CO concentrations close to congested intersections that experience high levels of traffic and elevated background concentrations may reach unhealthy levels, affecting nearby sensitive receptors. Given the high traffic volume potential, areas of high CO concentrations, or "hot spots," are typically associated with intersections that are projected to operate at unacceptable levels of service during the peak commute hours. It has long been recognized that CO hotspots are caused by vehicular emissions, primarily when idling at congested intersections. However, transport of this criteria pollutant is extremely limited, and CO disperses rapidly with distance from the source under normal meteorological conditions. Furthermore, vehicle emissions standards have become increasingly more stringent in the last 20 years. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams/mile for passenger cars (there are requirements for certain vehicles that are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of increasingly sophisticated and efficient emissions control technologies, CO concentration in the SoCAB is designated as in attainment. Detailed modeling of Project-specific CO "hot spots" is not necessary and thus this potential impact is addressed qualitatively.

A CO "hot spot" would occur if an exceedance of the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9 ppm were to occur. The analysis prepared for CO attainment in the SCAQMD's *1992 Federal Attainment Plan for Carbon Monoxide* in Los Angeles County and a Modeling and Attainment Demonstration prepared by the SCAQMD as part of the 2003 AQMP can be used to demonstrate the potential for CO exceedances of these standards. The SCAQMD is the air pollution control officer for much of southern California. The SCAQMD conducted a CO hot spot analysis as part of the 1992 CO Federal Attainment Plan at four busy intersections in Los Angeles County during the peak

morning and afternoon time periods. The intersections evaluated included Long Beach Boulevard and Imperial Highway (Lynwood), Wilshire Boulevard and Veteran Avenue (Westwood), Sunset Boulevard and Highland Avenue (Hollywood), and La Cienega Boulevard and Century Boulevard (Inglewood). The busiest intersection evaluated was at Wilshire Boulevard and Veteran Avenue, which has a traffic volume of approximately 100,000 vehicles per day. Despite this level of traffic, the CO analysis concluded that there was no violation of CO standards (SCAQMD 1992). In order to establish a more accurate record of baseline CO concentrations affecting the Los Angeles, a CO "hot spot" analysis was conducted in 2003 at the same four busy intersections in Los Angeles at the peak morning and afternoon time periods. This "hot spot" analysis did not predict any violation of CO standards. The highest one-hour concentration was measured at 4.6 ppm at Wilshire Boulevard and Veteran Avenue and the highest eight-hour concentration was measured at 8.4 ppm at Long Beach Boulevard and Imperial Highway. Thus, there was no violation of CO standards.

Similar considerations are also employed by other Air Districts when evaluating potential CO concentration impacts. More specifically, the Bay Area Air Quality Management District, the air pollution control officer for the San Francisco Bay Area, concludes that under existing and future vehicle emission rates, a given project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour, or 24,000 vehicles per hour where vertical and/or horizontal air does not mix, in order to generate a significant CO impact.

The Proposed Project is anticipated to result in an additional 100 daily traffic trips (KOA 2022; Appendix F). Thus, the Proposed Project would not generate traffic volumes at any intersection of more than 100,000 vehicles per day (or 44,000 vehicles per day) and there is no likelihood of the Project traffic exceeding CO values. This impact is less than significant.

Odors

Typically, odors are regarded as an annoyance rather than a health hazard. However, manifestations of a person's reaction to foul odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache).

With respect to odors, the human nose is the sole sensing device. The ability to detect odors varies considerably among the population and overall is quite subjective. Some individuals have the ability to smell minute quantities of specific substances; others may not have the same sensitivity but may have sensitivities to odors of other substances. In addition, people may have different reactions to the same odor; in fact, an odor that is offensive to one person (e.g., from a fast-food restaurant) may be perfectly acceptable to another. It is also important to note that an unfamiliar odor is more easily detected and is more likely to cause complaints than a familiar one. This is because of the phenomenon known as odor fatigue, in which a person can become desensitized to almost any odor and recognition only occurs with an alteration in the intensity.

Quality and intensity are two properties present in any odor. The quality of an odor indicates the nature of the smell experience. For instance, if a person describes an odor as flowery or sweet, then the person is describing the quality of the odor. Intensity refers to the strength of the odor. For example, a person may

use the word "strong" to describe the intensity of an odor. Odor intensity depends on the odorant concentration in the air. When an odorous sample is progressively diluted, the odorant concentration decreases. As this occurs, the odor intensity weakens and eventually becomes so low that the detection or recognition of the odor is quite difficult. At some point during dilution, the concentration of the odorant reaches a detection threshold. An odorant concentration below the detection threshold means that the concentration in the air is not detectable by the average human.

According to the SCAQMD, land uses commonly considered to be potential sources of obnoxious odorous emissions include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The Proposed Project does not include any uses identified by the SCAQMD as being associated with odors. Therefore, no impact would occur.

3.4.4 Mitigation Measures

Impacts would be less than significant therefore mitigation measures are not required.

3.4.5 Residual Impacts After Mitigation

Less than significant impacts would occur.

3.5 Biological Resources

3.5.1 Environmental Setting

The Project Site is in a residential area of northwest Beverly Hills and is completely surrounded by existing, established residential development with substantial landscaping, primarily for the purposes of decoration and to screen residential structures from adjacent streets. The existing environment is typical of urban settings in the Los Angeles Basin and is primarily comprised of buildings, surface streets, and non-native ornamental vegetation associated with landscaping. The local area is fully developed and lacks naturalized or native habitat for plant and wildlife species. The area has been developed for decades, and all native habitat that had once existed has been largely removed. No native vegetation communities, drainage features, wetlands, riparian corridors, or other undeveloped habitat occurs on the Project Site. In general, the ornamental landscape vegetation that characterizes the Project Site and vicinity is mature, with taller ornamental trees, shrubbery, and groundcover interspersed among the residential homes and surface streets (County of Los Angeles 2012).

3.5.2 Prior Environmental Review

3.5.2.1 Previous Environmental Analysis

The biological resources impacts associated with the 2014 operational changes at the Virginia Robinson Gardens were evaluated in the following documents:

- *Draft Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (September 2012) – pages 57 through 62*

- *Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (May 2014)*
- *Recirculated Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (July 2014)*

3.5.2.2 Previously Identified Significant Project Impacts

The 2014 SEIR did not identify any significant project impacts on biological resources associated with the previous operational changes at the Gardens.

3.5.2.3 Previously Identified Mitigation Measures

There were no mitigation measures identified in the 2014 SEIR because the impacts were found to be less than significant.

3.5.3 Environmental Impacts

The Gardens are home to approximately 150 bird species and have been designated by the National Wildlife Federation as an official Certified Wildlife Habitat Site. However, vegetation at the Project Site consists of non-native landscape plantings that do not function as any naturally occurring plant communities or habitat types. As such, the Project Site is not considered part of any sensitive natural community. In addition, no riparian, wetland, or other sensitive habitats are located on or immediately adjacent to the Project Site. As described in the 2012 Draft SEIR, no special-status plant or wildlife species are likely to occur on or in the vicinity of the Project Site due to existing anthropogenic-related disturbances and lack of suitable native habitat (County of Los Angeles 2012). Further, the Project Site is not governed by an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan. The Proposed Project does not include construction or land alteration activities that could result in the removal of existing vegetation or the addition of new vegetation at the Project Site. Existing protocols and precautions to protect the integrity of the structures and gardens will ensure that existing vegetation remains undisturbed by the proposed increase in visitors. Common wildlife would continue to benefit from the habitat that the gardens provide, and the biological functions and values associated with the existing environment would remain unchanged. A less than significant impact would occur.

3.5.4 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

3.5.5 Residual Impacts After Mitigation

Less than significant impacts would occur.

3.6 Cultural Resources

3.6.1 Environmental Setting

The cultural resources for the proposed operational changes at the Virginia Robinson Gardens are the same as those identified in the previously prepared 2014 SEIR (County of Los Angeles 2012; 2014a; 2014b). The Project Site was previously determined to be individually eligible for listing in the National Register of Historic Places (NRHP) on November 15, 1978 under NRHP Criterion C for Architecture and under Criterion A for Exploration/Settlement at the local level of significance. The Virginia Robinson Gardens is a registered California Point of Historical Interest and is also listed on the City of Beverly Hills' local historic landmarks list. As such, the Virginia Robinson Gardens is considered a Historical Resource in accordance with the California Environmental Quality Act (ECORP 2022; Appendix C).

3.6.2 Prior Environmental Review

3.6.2.1 Previous Environmental Analysis

The cultural resources impacts associated with the 2014 operational changes at the Virginia Robinson Gardens were evaluated in the following documents:

- *Draft Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (September 2012) – pages 63 through 68*
- *Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (May 2014)*
- *Recirculated Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (July 2014)*

3.6.2.2 Previously Identified Significant Project Impacts

The 2014 SEIR did not identify any significant project impacts on cultural resources associated with the previous operational changes at the Virginia Robinson Gardens.

3.6.2.3 Previously Identified Mitigation Measures

There were no mitigation measures identified in the 2014 SEIR because the impacts were found to be less than significant.

3.6.3 Environmental Impacts

Character-defining features within the Virginia Robinson Gardens would continue to be protected from direct and indirect actions of patrons under Special Use Event use guidelines, which has successfully occurred for decades. The proposed operational changes are consistent in type of use, use guidelines and rules, and long-term management that are already in place. The proposed operational changes will work to promote local historic preservation goals through continued public use and awareness though

increased and enhanced regulated access to the Virginia Robinson Gardens. Though these proposed operational changes will increase public use of the property, there will be no associated physical changes to the Virginia Robinson Gardens (ECORP 2022; Appendix C). Therefore, there will be no significant impact to the character-defining features or aspects of integrity of the Project Site.

3.6.4 Mitigation Measures

Based on the previous environmental impact analysis no new mitigation measures have been identified.

3.6.5 Residual Impacts After Mitigation

Less than significant impacts would occur.

3.7 Energy

3.7.1 Environmental Setting

Energy relates directly to environmental quality. Energy use can adversely affect air quality and other natural resources. The vast majority of California's air pollution is caused by burning fossil fuels. Consumption of fossil fuels is linked to changes in global climate and depletion of stratospheric ozone. Transportation energy use is related to the fuel efficiency of cars, trucks, and public transportation; choice of different travel modes (auto, carpool, and public transit); vehicle speeds; and miles traveled by these modes. Construction and routine operation and maintenance of transportation infrastructure also consume energy. In addition, residential, commercial, and industrial land uses consume energy, typically through the usage of natural gas and electricity. The impact analysis focuses on the sole source of energy that is relevant to the Proposed Project: automotive fuel as a result of increased daily visitors and special use events. It is noted that the extension of the operation hours and increase in the number of yearly events has the potential to impact operational electricity and natural gas usage; however, this increase would be negligible and was not accounted for in this analysis.

Fuel Consumption

Fuel use is typically measured in gallons (e.g., of gasoline or diesel fuel), although energy use for electric vehicles is measured in kilowatt hour (kWh). On-road fuel consumption in Los Angeles County from 2017 to 2021 is shown in Table 3.7-1. On-road fuel consumption has remained constant since 2021.

Table 3.7-1. Automotive Fuel Consumption in Los Angeles County 2017-2021

Year	Total Fuel Consumption (gallons)
2021	4,028,317,933
2020	3,562,972,128
2019	4,032,579,487
2018	4,110,058,522
2017	4,156,576,616

Source: CARB 2021.

3.7.2 Prior Environmental Review

3.7.2.1 Previous Environmental Analysis

The energy impacts associated with the 2014 operational changes at the Virginia Robinson Gardens were evaluated in the following documents:

- *Draft Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (September 2012) – page 133*
- *Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (May 2014)*
- *Recirculated Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (July 2014)*

3.7.2.2 Previously Identified Significant Project Impacts

The 2014 SEIR did not identify any significant project impacts to energy associated with the previous operational changes at the Virginia Robinson Gardens.

3.7.2.3 Previously Identified Mitigation Measures

There were no mitigation measures identified in the SEIR because the impacts were found to be less than significant.

3.7.3 Thresholds of Significance

In November 2018, the California Natural Resources Agency amended the CEQA Guidelines to include impact analysis to energy resources. Following Appendix G of the CEQA Guidelines, energy impacts are considered to be significant if the project would result in any of the following:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation, or

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

3.7.4 Environmental Impacts

The impact analysis focuses on the sole source of energy that is relevant to the Proposed Project: automotive fuel as a result of increased daily visitors and Special Use Events. Addressing energy impacts requires an agency to make a determination as to what constitutes a significant impact. There are no established thresholds of significance, statewide or locally, for what constitutes a wasteful, inefficient, and unnecessary consumption of energy for a proposed land use project. For the purpose of this analysis the amount of fuel necessary for increased visitors on the Project Site is calculated and compared to that consumed by on-road vehicles in Los Angeles County.

The amount of operational automotive fuel use was estimated using the CARB's EMFAC2021 computer program, which provides projections for typical daily fuel usage in Los Angeles County (see Appendix D). Fuel consumption associated with the Proposed Project is summarized in Table 3.7-2 (see Appendix D).

Table 3.7-2. Proposed Project Fuel Consumption

Energy Type	Annual Energy Consumption	Percentage Increase Countywide
Project Operations	16,389 gallons	0.006 percent

Source: Refer to Appendix D for Fuel Consumption calculations.
Notes: The Project increase in operational automotive fuel consumption is compared with the countywide fuel consumption in 2021.

The Project is estimated to generate an additional 100 daily trips (KOA 2022; Appendix F). As indicated in Table 3.7-2, this would result in the consumption of approximately 16,389 gallons of automotive fuel per year, which would increase the annual countywide automotive fuel consumption by 0.006 percent. This analysis conservatively assumes that all of the automobile trips projected to arrive at the Project during operations would be new to Los Angeles County. Fuel consumption associated with vehicle trips generated by the Project would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region. For these reasons, this impact would be less than significant.

The Project Site is currently, and has been since 1980, designated a house museum for public use that currently accommodates a myriad of events, such as children's programs, tours, photoshoots, and temporary exhibits and movie screenings. The Project would increase the number of Special Use Events occurring on the Project Site from 4 to 24 (up to 4 events per month) and increase the cap on the number of visitors per day from 100 to 200. The use of the Project Site would remain the same. As such, the Project would not conflict any plan for renewable energy or energy efficiency. No impact would occur.

3.7.5 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

3.7.6 Residual Impacts After Mitigation

Less than significant impacts would occur.

3.8 Geology and Soils

3.8.1 Environmental Setting

The site setting for this SEIR remains similar to that described in the 2014 SEIR (County of Los Angeles 2012; 2014a; 2014b). Several active and/or potentially active faults within Los Angeles County and the City of Beverly Hills could potentially affect structures on the Project Site due to seismic shaking. All of Southern California is in a seismically active region; as such, ground motion caused by an earthquake is likely to occur at the Project Site during the lifetime of the Proposed Project. The Project Site is located

approximately one mile from the Santa Monica fault that bisects Beverly Hills. However, the Santa Monica fault has not been active during recorded history. The current structures were updated in 1980 (upon opening as a public facility) to meet Building and Safety requirements to assure the safety of the visitors and have been maintained or upgraded over the years.

3.8.2 Prior Environmental Review

3.8.2.1 Previous Environmental Analysis

The geology and soil impacts associated with the 2014 operational changes at the Virginia Robinson Gardens were evaluated in the following documents:

- *Draft Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (September 2012) – pages 68 through 75*
- *Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (May 2014)*
- *Recirculated Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (July 2014)*

3.8.2.2 Previously Identified Significant Project Impacts

The 2014 SEIR did not identify any significant project impacts on geology and soils associated with the proposed operational changes at Virginia Robinson Gardens.

3.8.2.3 Previously Identified Mitigation Measures

There were no mitigation measures identified in the 2014 SEIR because the impacts were found to be less than significant.

3.8.3 Environmental Impacts

The Proposed Project would not result in any ground disturbing activities, would not alter the conditions of the existing soil, and would not alter drainage volumes or patterns on or off the Project Site. In addition, the increase in visitors would not result in soil erosion or loss of topsoil as visitors would continue to be required to stay on the designated paths and would not impact the existing setting. 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. The physical conditions of the Project Site would not be altered from existing conditions and visitors and employees would be exposed to the same amount of potential seismic ground shaking. No paleontological resources are known to have been discovered on the Project Site, and the Proposed Project would not include construction or ground-disturbing activities that could disturb such resources even if they were present. As such, the Proposed Project would have a less than significant impact on geology and soils.

3.8.4 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

3.8.5 Residual Impacts After Mitigation

Less than significant impacts would occur.

3.9 Greenhouse Gas Emissions

3.9.1 Environmental Setting

Greenhouse Gas (GHG) emissions are released as byproducts of fossil fuel combustion, waste disposal, energy use, land use changes, and other human activities. This release of gases, such as carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and chlorofluorocarbons, creates a blanket around the earth that allows light to pass through but traps heat at the surface, preventing its escape into space. While this is a naturally occurring process known as the greenhouse effect, human activities have accelerated the generation of GHGs beyond natural levels. The overabundance of GHGs in the atmosphere has led to an unexpected warming of the earth and has the potential to severely impact the earth's climate system.

Each GHG differs in its ability to absorb heat in the atmosphere based on the lifetime, or persistence, of the gas molecule in the atmosphere. CH_4 traps more than 25 times more heat per molecule than CO_2, and N_2O absorbs 298 times more heat per molecule than CO_2. Often, estimates of GHG emissions are presented in carbon dioxide equivalents (CO_2e). Expressing GHG emissions in carbon dioxide equivalents takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO_2 were being emitted.

The local air quality agency regulating the SoCAB is the SCAQMD, the regional air pollution control officer for the basin. As previously stated, to provide guidance to local lead agencies on determining significance for GHG emissions in CEQA documents, SCAQMD staff convened a GHG CEQA Significance Threshold Working Group. The Working Group was formed to assist the SCAQMD's efforts to develop a GHG significance threshold and is composed of a wide variety of stakeholders including the State Office of Planning and Research, CARB, the Attorney General's Office, a variety of city and county planning departments in the Basin, various utilities such as sanitation and power companies throughout the Basin, industry groups, and environmental and professional organizations. Numeric bright line and efficiency-based thresholds were developed to be consistent with CEQA requirements for developing significance thresholds, are supported by substantial evidence, and provide guidance to CEQA practitioners and lead agencies with regard to determining whether GHG emissions from a proposed project are significant.

In *Center for Biological Diversity v. Department of Fish and Wildlife* (2015) 62 Cal. 4th 2014, 213, 221, 227, following its review of various potential GHG thresholds proposed in an academic study [Crockett, *Addressing the Significance of Greenhouse Gas Emissions: California's Search for Regulatory Certainty in an Uncertain World* (July 2011), 4 Golden Gate U. Envtl. L. J. 203], the California Supreme Court identified the use of numeric bright-line thresholds as a potential pathway for compliance with CEQA GHG requirements. The study found numeric bright line thresholds designed to determine when small projects

were so small as to not cause a cumulatively considerable impact on global climate change was consistent with CEQA. Specifically, Public Resources Code section 21003(f) provides it is a policy of the State that "[a]ll persons and public agencies involved in the environmental review process be responsible for carrying out the process in the most efficient, expeditious manner in order to conserve the available financial, governmental, physical and social resources with the objective that those resources may be better applied toward the mitigation of actual significant effects on the environment." The Supreme Court-reviewed study noted, "[s]ubjecting the smallest projects to the full panoply of CEQA requirements, even though the public benefit would be minimal, would not be consistent with implementing the statute in the most efficient, expeditious manner. Nor would it be consistent with applying lead agencies' scarce resources toward mitigating actual significant climate change impacts." (Crockett, *Addressing the Significance of Greenhouse Gas Emissions: California's Search for Regulatory Certainty in an Uncertain World* (July 2011), 4 Golden Gate U. Envtl. L. J. 203, 221, 227.)

3.9.2 Prior Environmental Review

GHG-related impacts associated with the 2014 operational changes at the Virginia Robinson Gardens were evaluated in the following documents:

- *Draft Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (September 2012) pages 75 through 77*
- *Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (May 2014)*
- *Recirculated Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (July 2014)*

3.9.2.1 Previously Identified Significant Project Impacts

The 2014 SEIR did not identify any significant project GHG-related impacts associated with the proposed operational changes and therefore, no mitigation measures were required.

3.9.2.2 Previously Identified Mitigation Measures

There were no mitigation measures identified in the 2014 SEIR because the impacts were considered less than significant.

3.9.3 Thresholds of Significance

The significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) by considering whether the Project complies with applicable plans, policies, regulations and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. Lead agencies may set a project-specific threshold based on the context of each particular project, including using the SCAQMD Working Group expert recommendation. This standard is appropriate for this Project because it is in the same air quality basin that the experts analyzed. For the

Proposed Project, the SCAQMD's 3,000 metric tons of CO_2e per year threshold is used as the significance threshold in addition to the qualitative thresholds of significance set forth below from Section VII of CEQA Guidelines Appendix G. The 3,000 metric tons of CO_2e per year threshold represents a 90 percent capture rate (i.e., this threshold captures projects that represent approximately 90 percent of GHG emissions from new sources). The 3,000 metric tons of CO_2e per year value is typically used in defining small projects within this air basin that are considered less than significant because it represents less than one percent of future 2050 statewide GHG emissions target and the lead agency can provide more efficient implementation of CEQA by focusing its scarce resources on the top 90 percent. This threshold is correlated to the 90 percent capture rate for industrial projects within the air basin. Land use projects above the 3,000 metric tons of CO_2e per year level would fall within the percentage of largest projects that are worth mitigating without wasting scarce financial, governmental, physical and social resources (Crockett 2011). As noted in the academic study, the fact that small projects below a numeric bright line threshold are not subject to CEQA-based mitigation does not mean such small projects do not help the State achieve its climate change goals because even small projects participate in or comply with non-CEQA-based GHG reduction programs, such as constructing development in accordance with statewide GHG-reducing energy efficiency building standards, called Cal Green or Title 24 energy-efficiency building standards (Crockett 2011).

3.9.4 Environmental Impacts

3.9.4.1 Construction Emissions

The Proposed Project is proposing to expand the use of the Gardens to increase public access and benefit by extending the hours of operations, increasing the types of programs offered, and increasing the number of daily visitors. No construction is proposed for the Proposed Project. Therefore, no impact would occur.

3.9.4.2 Operational Emissions

Generation of GHG Emissions

Operations of the Project would result in an increase in GHG emissions primarily associated with motor vehicle trips. GHG emissions were modeled using CalEEMod, version 2020.4.0 (Appendix B). CalEEMod is a statewide land use emissions computer model designed to quantify pollutant emissions associated with both construction and operations from a variety of land use projects. Long-term operational GHG emissions as a result of the Proposed Project would mainly be attributed to the increase in daily visitors. It is noted that the increase in special use events, from 4 to 24, has the potential to increase GHG source emissions, however; this increase would be negligible and was not accounted for in CalEEMod. Long-term operational GHG emissions attributed to the Project are identified in Table 3.9-1.

Table 3.9-1. Operational-Related Greenhouse Gas Emissions	
Emission Source	**CO_2e (Metric Tons/Year)**
Area Source	0
Energy	0
Mobile	117
Waste	0
Water	0
Total:	**117**
SCAQMD Significance Threshold	*3,000*
Exceed SCAQMD Threshold?	**No**

Source: CalEEMod version 2020.4.0. Refer to Appendix B for Model Data Outputs.
Notes: Average daily vehicle trips provided by KOA (2022; Appendix F).

As shown in Table 3.9-1, operational-generated emissions would not exceed the SCAQMD's numeric bright-line threshold of 3,000 metric tons of CO_2e annually. This impact is less than significant.

Conflict with an Applicable Plan, Policy or Regulation

The Project Site is currently, and has been since 1980, designated a house museum for public use that currently accommodates a myriad of events, such as children's programs, tours, photoshoots, and temporary exhibits and movie screenings. The Project would increase the number of Special Use Events occurring on the Project Site from 4 to 24 (up to 4 events per month) and would increase the maximum number of visitors per day from 100 to 200. The use of the site would remain the same. As such, the Proposed Project would not conflict with any plan, policy or regulation adopted for the purpose of reducing GHG emissions. Additionally, as shown in Table 3.9-1, Project operations as a result of increased visitors would not exceed the SCAQMD's numeric bright-line threshold of 3,000 metric tons of CO_2e annually. No impact would occur.

3.9.5 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

3.9.6 Residual Impacts After Mitigation

The Proposed Project would not result in residual GHG impacts.

3.10 Hazards and Hazardous Materials

3.10.1 Environmental Setting

The hazards and hazardous materials setting for this SEIR remains similar to that described in the 2014 SEIR (County of Los Angeles 2012; 2014a; 2014b). 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. There are no hazardous materials at the Project Site that could be disturbed in other ways that would create a significant hazard to the public or the environment. According to the City of Beverly Hills General Plan, no sites within the City are currently listed in the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 database or the Cortese List. In addition, although there are properties in Beverly Hills on the Brownfield Reuse Program "CalSites" database and the Spills, Leaks, Investigations, and Cleanup list, these sites are not located within a one-mile radius of the Project Site and are topographically and hydrologically downgradient. Although properties on the EnviroStor database and the Leaking Underground Storage Tank (LUST) database are located within a one-mile radius from the Project Site, the sites have been remediated and the cases are closed. The Proposed Project is not located within 0.25 mile of an existing or proposed school. The closest airport to the Project Site is the Santa Monica Airport, located approximately 5 miles southwest of the Project Site.

3.10.1.1 Los Angeles County General Plan 2035

The County of Los Angeles General Plan Safety Element's purpose is to reduce the potential risk of death, injuries, and economic damage resulting from natural and manmade hazards (County of Los Angeles 2015). Goals and policies for emergency response include:

Goal S4: Effective County emergency response management capabilities.

Policy S4.5: Ensure that there are adequate resources, such as sheriff and fire services, for emergency response.

Policy S4.6: Ensure that essential public facilities are maintained during natural disasters, such as flooding.

All counties of California have a local Office of Emergency Services (OES) to identify hazards and to prepare for, respond to, mitigate, and help recover from both large and small local incidents. The Los Angeles County Office of Emergency Management (OEM) is a coordinating agency that brings together local agencies to focus on unified responses to disaster.

3.10.1.2 City of Beverly Hills Plans

The City of Beverly Hills has developed two plans designed to implement programs facilitating emergency management: the Emergency Operations Plan (EOP) and the Hazard Mitigation Action Plan (HMAP). The

EOP addresses the City's planned response to emergency situations associated with all hazards, such as natural and man-made disasters, technological incidents, and national security emergencies. In addition, the HMAP includes resources and information to assist City departments, residents, and public and private sector organizations in planning for hazards. The strategies outlined in the HMAP address multi-hazard issues as well as activities for earthquakes, wildfires, terrorism, earth movements, flooding, and windstorms.

3.10.2 Prior Environmental Review

3.10.2.1 Previous Environmental Analysis

Hazards and hazardous materials impacts associated with the 2014 operational changes at the Virginia Robinson Gardens were evaluated in the following documents:

- *Draft Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (September 2012) – pages 77 through 81*
- *Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (May 2014)*
- *Recirculated Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (July 2014)*

3.10.2.2 Previously Identified Significant Project Impacts

The 2014 SEIR did not identify any significant project impacts on hazards and hazardous materials.

3.10.2.3 Previously Identified Mitigation Measures

There were no mitigation measures identified in the 2014 SEIR because the impacts were found to be less than significant.

3.10.3 Environmental Impacts

Although more events would occur throughout the year (an increase of up to 20 additional Special Use Events per year), attendance at those events would be generally the same as under existing conditions. The Proposed Project would comply with all applicable City codes and regulations pertaining to emergency response and evacuation plans maintained by the police and fire departments in the City of Beverly Hills. According to the General Plan, Elden Way is not a street that carries regional traffic that could serve as a major evacuation route. The Beverly Hills *Wildfire Hazard Area and Evacuation Routes Interactive Map* designates Lexington Drive as the nearest evacuation route to the Project Site, which serves as a secondary evacuation route, approximately 1,000 feet south of the Project Site (City of Beverly Hills 2022b). Lexington Road connects to Beverly Drive to the east and Benedict Canyon Drive to the west, which are both designated as primary evacuation routes. The County would coordinate with the Gardens staff and City of Beverly Hills to expedite evacuation in the event of a wildfire or other emergency event.

To facilitate evacuation, an advanced reservation is required for parking to ensure that all visitors are able to park on site. No street parking on Elden Way is permitted by visitors. The Proposed Project would not include street closures and would not change the traffic flow or access to the Project Site, which could impede emergency evacuation. Additionally, each Special Use Event would continue to be required to prepare a traffic management plan, to ensure that emergency access to the Project site and surrounding area is maintained.

The Proposed Project would not involve changes to the physical environment, such as ground-disturbing or construction-related activities that could release hazardous materials into the environment. There are no hazardous materials at the Project Site that could be disturbed in other ways that would create a significant hazard to the public or the environment. In addition, the Proposed Project would not involve any changes to the on-site uses. The Project Site meets, and the Proposed Project would meet, all applicable regulations related to fire safety. Impacts would be less than significant.

3.10.4 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

3.10.5 Residual Impacts After Mitigation

Impacts would be less than significant.

3.11 Hydrology and Water Quality

3.11.1 Environmental Setting

The hydrology and water quality setting for this SEIR remains similar to that described in the 2014 SEIR (County of Los Angeles 2012; 2014a; 2014b). The City of Beverly Hills is located on the Central Coastal Plain of the Los Angeles Groundwater Basin. This basin is composed of four subbasins, three of which the City of Beverly Hills is able to access: Santa Monica Subbasin, Hollywood Subbasin, and Central Subbasin. According to the City's General Plan, the Project Site is located within the Hollywood Groundwater Basin (County of Los Angeles 2015). The City of Beverly Hills is located within the boundaries of the Ballona Creek Watershed, which drains an area of approximately 130 square miles. The Project Site is located approximately 0.75 mile east of Benedict Canyon Creek.

Currently, the Project Site is substantially pervious (approximately 5.5 acres of the total site acreage of 6.2 acres) and is heavily landscaped. As such, the majority of water entering the Project Site (rain and/or irrigation) is absorbed into the ground and does not runoff into neighboring properties down-gradient from the Project Site. In addition, much of the landscape in front of the main house has been designed to be drought tolerant and the irrigation system would not be altered with the implementation of the Proposed Project.

3.11.2 Prior Environmental Review

3.11.2.1 Previous Environmental Analysis

Hydrology and water quality impacts associated with the 2014 operational changes at the Virginia Robinson Gardens were evaluated in the following documents:

- *Draft Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (September 2012) – pages 82 through 89*
- *Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (May 2014)*
- *Recirculated Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (July 2014)*

3.11.2.2 Previously Identified Significant Project Impacts

The 2014 SEIR did not identify any significant project impacts on hydrology and water quality.

3.11.2.3 Previously Identified Mitigation Measures

There were no mitigation measures identified in the 2014 SEIR because the impacts were found to be less than significant.

3.11.3 Environmental Impacts

No additional impervious surfaces would be added as a result of the Proposed Project; therefore, additional runoff would not be created. The project would not create or contribute to runoff water that would exceed the capacity of existing or planned stormwater drainage. 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.

Rainwater is captured on-site, with the water penetrating the grounds and recharging local groundwater source(s). The Proposed Project would not involve construction, which could penetrate the groundwater table and degrade the water quality.

While the Proposed Project would increase visitation to the Project Site on a weekly basis (due to the increase in daily hours and the additional operational day) and annually (due to the increase of special use events), the Project would not result in a substantial water demand that would require the Metropolitan Water District (MWD) to obtain more water resources from groundwater sources (refer to Section 3.20. Utilities and Service Systems of this SEIR for further information regarding project-related water demand). All water features in the Gardens have recirculating pumps to conserve water. The front lawn grass has been replaced with a drought tolerant meadow, and trees that were determined to be too water intensive were replaced with more climate-appropriate Mediterranean plantings. The Gardens participates in the

City of Beverly Hills' WaterWise program. 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.

3.11.4 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

3.11.5 Residual Impacts After Mitigation

Impacts would be less than significant.

3.12 Land Use and Planning

3.12.1 Environmental Setting

The land use and planning setting for this SEIR remains similar to that described in the 2014 SEIR (County of Los Angeles 2012; 2014a; 2014b). The Project Site is located at 1008 Elden Way in the northwestern portion of Beverly Hills. The Project Site is approximately 6.2 acres in size, located at the end of a cul-de-sac in an established residential area. Consistent with surrounding land uses, the Project Site is developed with the main residence, the pool pavilion, a swimming pool, tennis court, and approximately 5.5 acres of landscaped grounds.

Development in the immediate vicinity of the Project Site includes residential uses to the north, west, south, and east. The surrounding area is characterized by curvilinear streets lined with large, well maintained single-family homes with extensive landscaping that obstructs direct views of the residences.

The Project Site is under the ownership and jurisdiction of Los Angeles County, but within the City of Beverly Hills. Because the Proposed Project is regarded as a public function, the County would have sovereign immunity from the zoning and building regulations of the City. However, to ensure consistency with the surrounding community, the Proposed Project would adhere to the City's land use requirements. 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.

3.12.1.1 City of Beverly Hills General Plan

The City's General Plan Land Use Element describes the following plans and policies related to existing neighborhood character and quality:

> *LU 2.1 City Places: Neighborhoods, Districts, and Corridors. Maintain and enhance the character, distribution, built form, scale, and aesthetic qualities of the City's distinctive residential neighborhoods, business districts, corridors, and open spaces.*

LU 2.6 City History. Acknowledge the City's history of places and buildings, preserving historic sites, buildings, and districts that contribute to the City's identity while accommodating renovations of existing buildings to maintain their economic viability, provided the new construction contextually "fits" and complements the site or building.

LU 5.1 Neighborhood Conservation. Maintain the uses, densities, character, amenities, and quality of the City's residential neighborhoods, recognizing their contribution to the City's identity, economic value, and quality of life.

LU 6.1 Neighborhood Identity. Maintain the characteristics that distinguish the City's single-family neighborhoods from one another in such terms as topography, lot size, housing scale and form, and public streetscapes.

3.12.2 Prior Environmental Review

3.12.2.1 Previous Environmental Analysis

The land use and planning impacts associated with the 2014 operational changes at the Virginia Robinson Gardens were evaluated in the following documents:

- *Draft Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (September 2012) – pages 89 through 94*
- *Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (May 2014)*
- *Recirculated Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (July 2014)*

3.12.2.2 Previously Identified Significant Project Impacts

The 2014 SEIR did not identify any significant project impacts on land use and planning.

3.12.2.3 Previously Identified Mitigation Measures

No significant impacts were identified; therefore, no mitigation measures were required.

3.12.3 Environmental Impacts

By way of discretionary action, the County Board of Supervisors will consider an amendment to the existing Agreement between the County and The Friends of Virginia Robinson Gardens. Formally, this amendment will consist of revising Section 4.05 of the Agreement to reflect the proposed changes to the operation of Virginia Robinson Gardens. As such, the Proposed Project would maintain the consistency of the existing uses of the Project Site with, and would not conflict with, the existing City of Beverly Hills land use plans and regulations.

Although the Gardens is available to be rented for commercial purposes, the rental process is not unique to the Gardens, as public facilities in the City and County are available for private rental. The proposed increase in the number of special events would improve the fundraising that supports the educational programs and maintenance of the Gardens. Private event rental is a vital means for raising funds to sustain the operations of facilities like the Virginia Robinson Gardens and lessens the tax-payer burden. Renting for private events is a normal operation and legal under the 501(c)(3) charitable tax designation, does not change a venue's tax status, and reflects the values of Virginia Robinson's bequeathment. 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. Further, because the Proposed Project would amend the existing operational hours and days of the Project Site that were established in the 1980 EIR and modified in the 2014 SEIR (although not the land uses regulations), the Proposed Project would be consistent with the land use regulations and policies for the Project Site. The changes are consistent with the existing uses of the Project Site, as they are effectively an expansion of the existing uses, thereby not introducing new uses on site.

Currently, an advanced reservation is required for parking to ensure that all visitors are able to park on the site. No street parking is permitted on Elden Way. 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. Additionally, with advanced reservations, visitors would be allowed to arrive at the Project Site on foot or be dropped off at the gate. This would support the current trend of visitors from the adjacent neighborhood walking to the site, as well as the current social promotion of the use of public transportation and alternative modes of transportation (such as Uber, Lyft, and taxis). Special Use Events would comply with City ordinances, and valet service must obtain City parking permits for use of public streets to avoid overlapping events with surrounding neighbors. No additional cars would be allowed to park on the street with the Proposed Project than are currently allowed. Impacts would be less than significant.

In addition to the County of Los Angeles (Lead Agency), no other agency approvals are required; however, as a courtesy to the City of Beverly Hills, input from the City will continue to be sought. As a good neighbor, the Department of Parks and Recreation aims to comply with the City's regulations. Impacts to land use and planning would be less than significant.

3.12.4 Mitigation Measures

No significant impacts have been identified; therefore, no mitigation measures are required.

3.12.5 Residual Impacts After Mitigation

Project impacts would be less than significant.

3.13 Mineral Resources

3.13.1 Environmental Setting

The Proposed Project is located in a highly developed residential neighborhood in the northern area of the City of Beverly Hills. As identified in the Mineral Resource Zones (MRZ) map included in the Conservation Element of the City's General Plan, the Project Site is located within an area designated as MRZ-3. The classification MRZ-3 is assigned to areas of undetermined resource significance. As the Project Site and the surrounding area are substantially developed, any mineral resources that may have existed have already been disturbed or made unavailable (County of Los Angeles 2012).

3.13.2 Prior Environmental Review

3.13.2.1 Previous Environmental Analysis

The mineral resources impacts associated with the 2014 operational changes at the Virginia Robinson Gardens were evaluated in the following documents:

- *Draft Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (September 2012) – page 95*
- *Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (May 2014)*
- *Recirculated Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (July 2014)*

3.13.2.2 Previously Identified Significant Project Impacts

The 2014 SEIR did not identify any significant project impacts to mineral resources associated with the previous operational changes at the Virginia Robinson Gardens.

3.13.2.3 Previously Identified Mitigation Measures

There were no mitigation measures identified in the 2014 SEIR because the impacts were found to be less than significant.

3.13.3 Environmental Impacts

The Proposed Project would not result in construction activities or physical alterations of the Project Site, including subsurface activities, such that mineral resources would be encountered. As such, the Proposed Project would not result in the loss of availability of a known mineral resource or interfere, to any greater extent than under existing conditions, with a mineral resource that would be of value to the region and residents of the state, thereby resulting in no impact.

3.13.4 Mitigation Measures

No impact would occur therefore mitigation measures are not required.

3.13.5 Residual Impacts After Mitigation

No impact would occur.

3.14 Noise

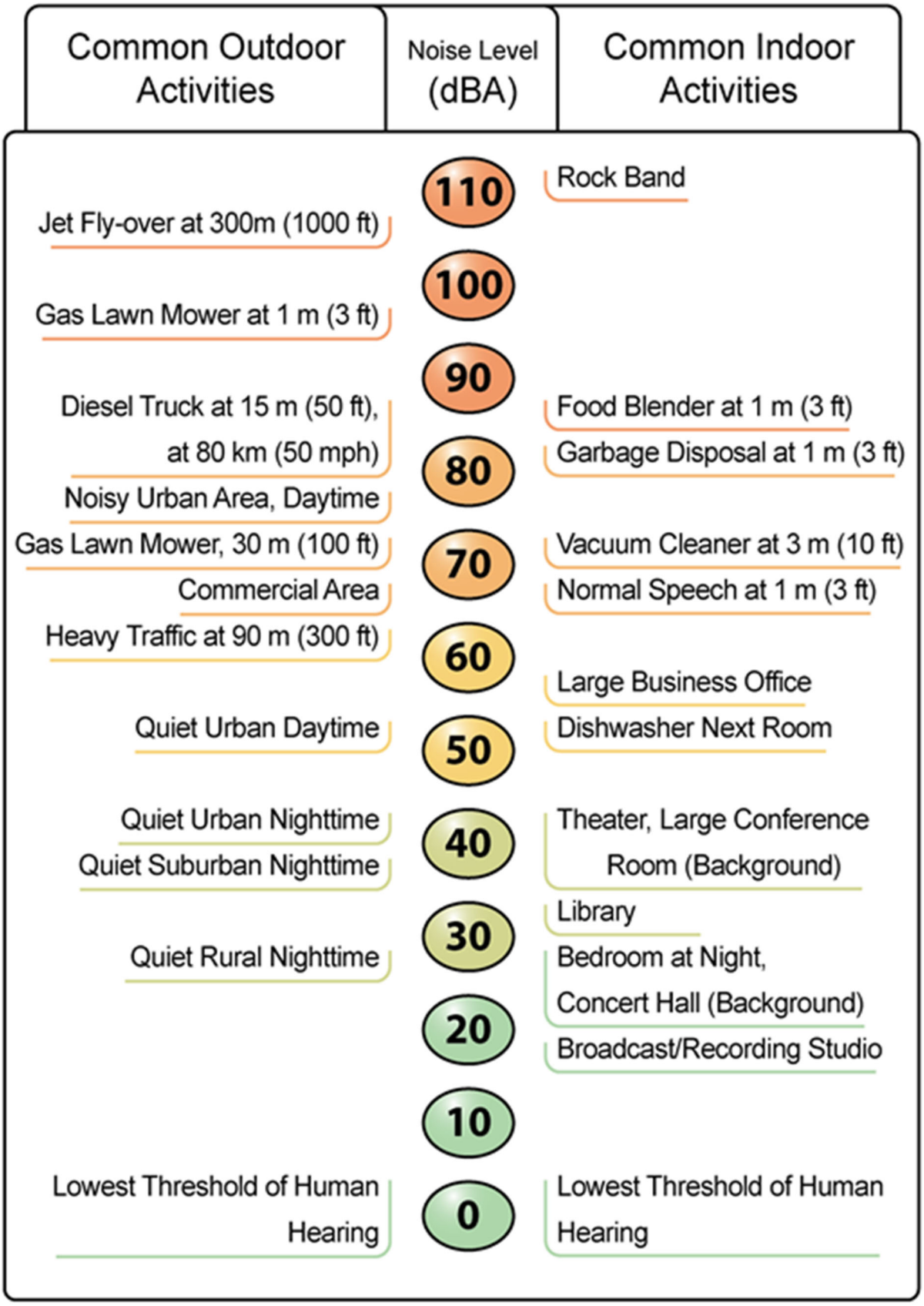
3.14.1 Environmental Setting

3.14.1.1 Addition of Decibels

Noise is defined as unwanted sound. Sound is technically described in terms of the loudness (amplitude) and frequency (pitch) of the sound. The decibel (dB) scale is logarithmic, not linear, and therefore sound levels cannot be added or subtracted through ordinary arithmetic. Two sound levels 10 dB apart differ in acoustic energy by a factor of 10. When the standard logarithmic decibel is A-weighted (dBA), an increase of 10 dBA is generally perceived as a doubling in loudness. For example, a 70 dBA sound is half as loud as an 80 dBA sound and twice as loud as a 60 dBA sound. When two identical sources are each producing sound of the same loudness, the resulting sound level at a given distance would be three dB higher than one source under the same conditions (Federal Transit Administration [FTA] 2018). For example, a 65 dB source of sound, such as a truck, when joined by another 65 dB source results in a sound amplitude of 68 dB, not 130 dB (i.e., doubling the source strength increases the sound pressure by three dB). Under the decibel scale, three sources of equal loudness together would produce an increase of five dB. Typical noise levels associated with common noise sources are depicted in Figure 3-1.

3.14.1.2 Sound Propagation and Attenuation

Noise can be generated by a number of sources, including mobile sources such as automobiles, trucks and airplanes, and stationary sources such as construction sites, machinery, and industrial operations. Sound spreads (propagates) uniformly outward in a spherical pattern, and the sound level decreases (attenuates) at a rate of approximately six dB for each doubling of distance from a stationary or point source. Sound from a line source, such as a highway, propagates outward in a cylindrical pattern, often referred to as cylindrical spreading. Sound levels attenuate at a rate of approximately three dB for each doubling of distance from a line source, such as a roadway, depending on ground surface characteristics (Federal Highway Administration [FHWA] 2011). No excess attenuation is assumed for hard surfaces like a parking lot or a body of water. Soft surfaces, such as soft dirt or grass, can absorb sound, so an excess ground-attenuation value of 1.5 dB per doubling of distance is normally assumed. For line sources, an overall attenuation rate of three dB per doubling of distance is assumed (FHWA 2011).



Source: California Department of Transportation (Caltrans) 2020a

Figure 3-1. Common Noise Levels

Noise levels may also be reduced by intervening structures; generally, a single row of detached buildings between the receptor and the noise source reduces the noise level by about five dBA (FHWA 2006), while a solid wall or berm generally reduces noise levels by 10 to 20 dBA (FHWA 2011). However, noise barriers or enclosures specifically designed to reduce site-specific construction noise can provide a sound reduction 35 dBA or greater (Western Electro-Acoustic Laboratory, Inc. [WEAL] 2000). To achieve the most potent noise-reducing effect, a noise enclosure/barrier must physically fit in the available space, must completely break the "line of sight" between the noise source and the receptors, must be free of degrading holes or gaps, and must not be flanked by nearby reflective surfaces. Noise barriers must be sizable enough to cover the entire noise source and extend lengthwise and vertically as far as feasibly possible to be most effective.

The limiting factor for a noise barrier is not the component of noise transmitted through the material, but rather the amount of noise flanking around and over the barrier. In general, barriers contribute to decreasing noise levels only when the structure breaks the "line of sight" between the source and the receiver.

The manner in which older homes in California were constructed generally provides a reduction of exterior-to-interior noise levels of about 20 to 25 dBA with closed windows (Caltrans 2002). The exterior-to-interior reduction of newer residential units is generally 30 dBA or more (Harris Miller, Miller & Hanson Inc. [HMMH] 2006). Generally, in exterior noise environments ranging from 60 dBA Community Noise Equivalent Level (CNEL) to 65 dBA CNEL, interior noise levels can typically be maintained below 45 dBA, a typically residential interior noise standard, with the incorporation of an adequate forced air mechanical ventilation system in each residential building, and standard thermal-pane residential windows/doors with a minimum rating of Sound Transmission Class (STC) 28. (STC is an integer rating of how well a building partition attenuates airborne sound. In the U.S., it is widely used to rate interior partitions, ceilings, floors, doors, windows, and exterior wall configurations.) In exterior noise environments of 65 dBA CNEL or greater, a combination of forced-air mechanical ventilation and sound-rated construction methods is often required to meet the interior noise level limit. Attaining the necessary noise reduction from exterior to interior spaces is readily achievable in noise environments less than 75 dBA CNEL with proper wall construction techniques following California Building Code methods, the selections of proper windows and doors, and the incorporation of forced-air mechanical ventilation systems.

3.14.1.3 Noise Descriptors

The decibel scale alone does not adequately characterize how humans perceive noise. The dominant frequencies of a sound have a substantial effect on the human response to that sound. Several rating scales have been developed to analyze the adverse effect of community noise on people. Because environmental noise fluctuates over time, these scales consider that the effect of noise on people is largely dependent on the total acoustical energy content of the noise, as well as the time of day when the noise occurs. The L_{eq} is a measure of ambient noise, while the L_{dn} and CNEL (Community Noise Equivalent Level) are measures of community noise. Each is applicable to this analysis and defined in Table 3.14-1.

Table 3.14-1. Common Acoustical Descriptors

Descriptor	Definition
Decibel, dB	A unit describing the amplitude of sound, equal to 20 times the logarithm to the base 10 of the ratio of the pressure of the sound measured to the reference pressure. The reference pressure for air is 20.
Sound Pressure Level	Sound pressure is the sound force per unit area, usually expressed in micropascals (or 20 micronewtons per square meter), where 1 pascal is the pressure resulting from a force of 1 newton exerted over an area of 1 square meter. The sound pressure level is expressed in decibels as 20 times the logarithm to the base 10 of the ratio between the pressures exerted by the sound to a reference sound pressure (e.g., 20 micropascals). Sound pressure level is the quantity that is directly measured by a sound level meter.
Frequency, Hz	The number of complete pressure fluctuations per second above and below atmospheric pressure. Normal human hearing is between 20 Hz and 20,000 Hz. Infrasonic sound are below 20 Hz and ultrasonic sounds are above 20,000 Hz.
A-Weighted Sound Level, dBA	The sound pressure level in decibels as measured on a sound level meter using the A weighting filter network. The A-weighting filter de-emphasizes the very low and very high frequency components of the sound in a manner similar to the frequency response of the human ear and correlates well with subjective reactions to noise.
Equivalent Noise Level, L_{eq}	The average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.
L_{max}, L_{min}	The maximum and minimum A-weighted noise level during the measurement period.
L_{01}, L_{10}, L_{50}, L_{90}	The A-weighted noise levels that are exceeded 1%, 10%, 50%, and 90% of the time during the measurement period.
Day/Night Noise Level, L_{dn} or DNL	A 24-hour average L_{eq} with a 10 dBA "weighting" added to noise during the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the nighttime. The logarithmic effect of these additions is that a 60 dBA 24-hour L_{eq} would result in a measurement of 66.4 dBA L_{dn}.
Community Noise Equivalent Level, CNEL	A 24-hour average L_{eq} with a 5 dBA "weighting" during the hours of 7:00 p.m. to 10:00 p.m. and a 10 dBA "weighting" added to noise during the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a 60 dBA 24-hour L_{eq} would result in a measurement of 66.7 dBA CNEL.
Ambient Noise Level	The composite of noise from all sources near and far. The normal or existing level of environmental noise at a given location.
Decibel, dB	A unit describing the amplitude of sound, equal to 20 times the logarithm to the base 10 of the ratio of the pressure of the sound measured to the reference pressure. The reference pressure for air is 20.

The A weighted decibel sound level scale gives greater weight to the frequencies of sound to which the human ear is most sensitive. Because sound levels can vary markedly over a short period of time, a method for describing either the average character of the sound or the statistical behavior of the variations must be utilized. Most commonly, environmental sounds are described in terms of an average level that has the same acoustical energy as the summation of all the time-varying events.

The scientific instrument used to measure noise is the sound level meter. Sound level meters can accurately measure environmental noise levels to within approximately 1 dBA. Various computer models are used to predict environmental noise levels from sources, such as roadways and airports. The accuracy of the predicted models depends on the distance between the receptor and the noise source. Close to the noise source, the models are accurate to within approximately 1 to 2 dBA.

3.14.1.4 Human Response to Noise

The human response to environmental noise is subjective and varies considerably from individual to individual. Noise in the community has often been cited as a health problem, not in terms of actual physiological damage, such as hearing impairment, but in terms of inhibiting general well-being and contributing to undue stress and annoyance. The health effects of noise in the community arise from interference with human activities, including sleep, speech, recreation, and tasks that demand concentration or coordination. Hearing loss can occur at the highest noise intensity levels.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day or night or over a 24-hour period. Environmental noise levels are generally considered low when the CNEL is below 60 dBA, moderate in the 60 to 70 dBA range, and high above 70 dBA. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet, suburban, residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate-level noise environments are urban residential or semi-commercial areas (typically 55 to 60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with noisier urban residential or residential-commercial areas (60 to 75 dBA) or dense urban or industrial areas (65 to 80 dBA). Regarding increases in A-weighted noise levels (dBA), the following relationships should be noted in understanding this analysis:

- Except in carefully controlled laboratory experiments, a change of 1 dBA cannot be perceived by humans.
- Outside of the laboratory, a 3 dBA change is considered a just-perceivable difference.
- A change in level of at least 5 dBA is required before any noticeable change in community response would be expected. An increase of 5 dBA is typically considered substantial.
- A 10 dBA change is subjectively heard as an approximate doubling in loudness and would almost certainly cause an adverse change in community response.

3.14.1.5 Effects of Noise on People

Hearing Loss

While physical damage to the ear from an intense noise impulse is rare, a degradation of auditory acuity can occur even within a community noise environment. Hearing loss occurs mainly due to chronic exposure to excessive noise but may be due to a single event such as an explosion. Natural hearing loss associated with aging may also be accelerated from chronic exposure to loud noise.

The Occupational Safety and Health Administration (OSHA) has a noise exposure standard that is set at the noise threshold where hearing loss may occur from long-term exposures. The maximum allowable level is 90 dBA averaged over eight hours. If the noise is above 90 dBA, the allowable exposure time is correspondingly shorter.

Annoyance

Attitude surveys are used for measuring the annoyance felt in a community for noises intruding into homes or affecting outdoor activity areas. In these surveys, it was determined that causes for annoyance include interference with speech, radio and television, house vibrations, and interference with sleep and rest. The L_{dn} as a measure of noise has been found to provide a valid correlation of noise level and the percentage of people annoyed. People have been asked to judge the annoyance caused by aircraft noise and ground transportation noise. There continues to be disagreement about the relative annoyance of these different sources.

3.14.1.6 Fundamentals of Environmental Ground-borne Vibration

Vibration Sources and Characteristics

Sources of earth-borne vibrations include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) or manmade causes (explosions, machinery, traffic, trains, construction equipment, etc.). Vibration sources may be continuous (e.g., factory machinery) or transient (e.g., explosions).

Ground vibration consists of rapidly fluctuating motions or waves with an average motion of zero. Several different methods are typically used to quantify vibration amplitude. One is the peak particle velocity (PPV); another is the root mean square (RMS) velocity. The PPV is defined as the maximum instantaneous positive or negative peak of the vibration wave. The RMS velocity is defined as the average of the squared amplitude of the signal. The PPV and RMS vibration velocity amplitudes are used to evaluate human response to vibration.

PPV is generally accepted as the most appropriate descriptor for evaluating the potential for building damage. For human response, however, an average vibration amplitude is more appropriate because it takes time for the human body to respond to the excitation (the human body responds to an average vibration amplitude, not a peak amplitude). Because the average particle velocity over time is zero, the RMS amplitude is typically used to assess human response. The RMS value is the average of the amplitude squared over time, typically a 1- sec. period (FTA 2018).

Table 3.14-2 displays the reactions of people and the effects on buildings produced by continuous vibration levels. The annoyance levels shown in the table should be interpreted with care since vibration may be found to be annoying at much lower levels than those listed, depending on the level of activity or the sensitivity of the individual. To sensitive individuals, vibrations approaching the threshold of perception can be annoying. Low-level vibrations frequently cause irritating secondary vibration, such as a slight rattling of windows, doors, or stacked dishes. The rattling sound can give rise to exaggerated vibration complaints, even though there is very little risk of actual structural damage. In high-noise environments, which are more prevalent where ground-borne vibration approaches perceptible levels, this rattling phenomenon may also be produced by loud airborne environmental noise causing induced vibration in exterior doors and windows.

Ground vibration can be a concern in instances where buildings shake, and substantial rumblings occur. However, it is unusual for vibration from typical urban sources such as buses and heavy trucks to be perceptible. For instance, heavy-duty trucks generally generate ground-borne vibration velocity levels of 0.006 PPV at 50 feet under typical circumstances, which as identified in Table 3.14-2 is considered very unlikely to cause damage to buildings of any type. Common sources for ground-borne vibration are planes, trains, and construction activities such as earth-moving which requires the use of heavy-duty earth moving equipment.

Table 3.14-2. Human Reaction and Damage to Buildings for Continuous or Frequent Intermittent Vibration Levels

Peak Particle Velocity (inches/second)	Approximate Vibration Velocity Level (VdB)	Human Reaction	Effect on Buildings
0.006–0.019	64–74	Range of threshold of perception	Vibrations unlikely to cause damage of any type
0.08	87	Vibrations readily perceptible	Recommended upper level to which ruins and ancient monuments should be subjected
0.1	92	Level at which continuous vibrations may begin to annoy people, particularly those involved in vibration sensitive activities	Virtually no risk of architectural damage to normal buildings
0.2	94	Vibrations may begin to annoy people in buildings	Threshold at which there is a risk of architectural damage to normal dwellings
0.4–0.6	98–104	Vibrations considered unpleasant by people subjected to continuous vibrations and unacceptable to some people walking on bridges	Architectural damage and possibly minor structural damage

Source: Caltrans 2020b

Existing Ambient Noise Environment

Noise Sensitive Land Uses

Noise-sensitive land uses are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose. Residential dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. Additional land uses such as hospitals, historic sites, cemeteries, and certain recreation areas are considered sensitive to increases in exterior noise levels. Schools, churches, hotels, libraries, and other places where low interior noise levels are essential are also considered noise-sensitive land uses.

The Project Site is located in a highly developed area of the City of Beverly Hills and is surrounded by single-family residential properties to the north, south, east and west directly adjacent to the Project Site boundary.

Existing Ambient Noise Environment

The most common and significant source of noise in the City of Beverly Hills is mobile noise generated by transportation-related sources. Other sources of noise are the various land uses (i.e., residential and commercial) that generate stationary-source noise. The Gardens was built in 1911 and has been a house museum and botanical garden for public use since 1980. It is located in an established residential neighborhood surrounded by single-family residential land uses. As shown in Table 3.14-3, the long-term ambient recorded noise level was measured at 49.4 dBA CNEL on the Project Site. Additionally, according to the 2014 SEIR, the short-term ambient recorded noise levels range from 51.0 to 69.0 dBA L_{eq} near the Project Site.

Existing Ambient Noise Measurements

In order to quantify existing ambient noise levels on the Project Site, a 90-hour (3.75 days) noise measurement was conducted starting on Friday, February 11, 2022, extending into Tuesday, February 15, 2022. The noise measurement is representative of the typical existing noise experienced within the Project Site during both weekend and weekdays and is depicted in Table 3.14-3. See Appendix E for the Noise Measurement Location.

Table 3.14-3. Existing (Baseline) Noise Measurement

Location	CNEL dBA	L_{eq} dBA	L_{min} dBA	L_{max} dBA	Time
Near the southern portion of the Project Site approximately 50 feet from Elden Way.	**49.4**	45.7	28.1	83.1	11:04 a.m. – 5:46 a.m.

Source: The noise measurement was taken by ECORP with a Larson Davis SoundExpert LxT precision sound level meter, which satisfies the American National Standards Institute for general environmental noise measurement instrumentation. Prior to the measurements, the SoundExpert LxT sound level meter was calibrated according to manufacturer specifications with a Larson Davis CAL200 Class I Calibrator. See Appendix E for noise measurement outputs.

Notes: CNEL is a 24-hour average L_{eq} with a 5 dBA "weighting" during the hours of 7:00 p.m. to 10:00 p.m. and a 10 dBA "weighting" added to noise during the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively. L_{eq} is the average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. L_{min} is the minimum noise level during the measurement period and L_{max} is the maximum noise level during the measurement period.

As shown in Table 3.14-3, the long-term ambient recorded noise level was measured at 49.4 dBA CNEL. Environmental noise levels are generally considered low when the CNEL is below 60 dBA, moderate in the 60 to 70 dBA range, and high above 70 dBA. Therefore, the 24-hour noise measurement of 49.4 dBA CNEL suggests that the Project vicinity currently experiences low levels of noise. The most common noise in the Project vicinity is produced by automotive vehicles (e.g., cars, trucks, buses, motorcycles). Traffic moving along streets produces a sound level that remains relatively constant and is part of the minimum ambient noise level in the Project vicinity. Vehicular noise varies with the volume, speed and type of traffic. Slower traffic produces less noise than fast-moving traffic. Trucks typically generate more noise than cars. Infrequent or intermittent noise also is associated with vehicles, including sirens, vehicle alarms, slamming of doors, trains, garbage and construction vehicle activity and honking of horns. These noises add to urban noise and are regulated by a variety of agencies.

Existing Roadway Noise Levels

Existing roadway noise levels were calculated for the roadway segments in the Project vicinity. This task was accomplished using the FHWA Highway Traffic Noise Prediction Model (FHWA-RD-77-108) (see Appendix B) and traffic volumes from the Project's Traffic Impact Study (KOA 2022). The model calculates the average noise level at specific locations based on traffic volumes, average speeds, roadway geometry, and site environmental conditions. The average vehicle noise rates (energy rates) used in the FHWA model have been modified to reflect average vehicle noise rates identified for California by Caltrans. The Caltrans data shows that California automobile noise is 0.8 to 1.0 dBA higher than national levels and that medium and heavy truck noise is 0.3 to 3.0 dBA lower than national levels. The average daily noise levels along these roadway segments are presented in Table 3.14-4.

Table 3.14-4. Existing (Baseline) Traffic Noise Levels

Roadway Segment	Surrounding Uses	CNEL at 100 feet from Centerline of Roadway
North Beverly Drive		
North of Lexington Road	Residential	59.4
South of Lexington Road	Residential	58.0
North Crescent Drive		
South of Lexington Road	Residential	50.7
Between Lexington Road and Elden Way	Residential	41.9
Elden Way		
North of North Crescent Drive	Residential	39.1
Lexington Road		
East of North Beverly Drive	Residential	52.5
Between North Beverly Drive and Crescent Drive	Residential	54.6
Between Crescent Drive and Oxford Way	Residential	55.7
Between Oxford Way and Hartford Way	Residential	55.7
Between Hartford Way and Benedict Canyon Drive	Residential	52.5
West of Benedict Canyon Drive	Residential	53.9
Oxford Way		
South of Lexington Road	Residential	41.3
Hartford Way		
South of Lexington Road	Residential	42.1
Between Lexington Road and Cove Way	Residential	54.0
Between Cove Way and Benedict Canyon Road	Residential	50.2
West of Benedict Canyon Road	Residential	46.3
Cove Way		
North of Hartford Way	Residential	55.4
Benedict Canyon Drive		
South of Lexington Road	Residential	57.1
Between Lexington Road and North Roxbury Drive	Residential	59.1
North of Hartford Way	Residential	61.2

Source: Traffic noise levels were calculated by ECORP using the FHWA roadway noise prediction model in conjunction with the trip generation rate identified by KOA (2022). Refer to Appendix E for traffic noise modeling assumptions and results.

As shown, the existing traffic-generated noise level on Project-vicinity roadways currently ranges from 41.9 to 61.2 dBA CNEL at a distance of 100-feet from the centerline. As previously described, CNEL is 24-hour average noise level with a 5 dBA "weighting" during the hours of 7:00 p.m. to 10:00 p.m. and a 10 dBA "weighting" added to noise during the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively.

3.14.2 Regulatory Setting

3.14.2.1 Federal

Occupational Safety and Health Act of 1970

OSHA regulates onsite noise levels and protects workers from occupational noise exposure. To protect hearing, worker noise exposure is limited to 90 decibels with A-weighting (dBA) over an eight-hour work shift (29 Code of Regulations 1910.95). Employers are required to develop a hearing conservation program when employees are exposed to noise levels exceeding 85 dBA. These programs include provision of hearing protection devices and testing employees for hearing loss on a periodic basis.

U.S. Environmental Protection Agency Office of Noise Abatement and Control

The U.S. Environmental Protection Agency (USEPA) Office of Noise Abatement and Control was originally established to coordinate Federal noise control activities. In 1981, USEPA administrators determined that subjective issues such as noise would be better addressed at more local levels of government. Consequently, in 1982 responsibilities for regulating noise control policies were transferred to State and local governments. However, documents and research completed by the EPA Office of Noise Abatement and Control continue to provide value in the analysis of noise effects.

3.14.2.2 State

State of California General Plan Guidelines

The State of California regulates vehicular and freeway noise affecting classrooms, sets standards for sound transmission and occupational noise control, and identifies noise insulation standards and airport noise/land-use compatibility criteria. The State of California General Plan Guidelines (State of California 2003), published by the Governor's Office of Planning and Research (OPR), also provides guidance for the acceptability of projects within specific CNEL/Ldn contours. The guidelines also present adjustment factors that may be used in order to arrive at noise acceptability standards that reflect the noise control goals of the community, the particular community's sensitivity to noise, and the community's assessment of the relative importance of noise pollution.

State Office of Planning and Research Noise Element Guidelines

The State OPR Noise Element Guidelines include recommended exterior and interior noise level standards for local jurisdictions to identify and prevent the creation of incompatible land uses due to noise. The

Noise Element Guidelines contain a land use compatibility table that describes the compatibility of various land uses with a range of environmental noise levels in terms of the CNEL.

California Department of Transportation

In 2020, the California Department of Transportation (Caltrans) published the Transportation and Construction Vibration Manual (Caltrans 2020b). The manual provides general guidance on vibration issues associated with the construction and operation of projects concerning human perception and structural damage. Table 2 presents recommendations for levels of vibration that could result in damage to structures exposed to continuous vibration.

3.14.2.3 Local

City of Beverly Hills General Plan Noise Element

The Noise Element of the City's General Plan provides policy direction for minimizing noise impacts on the community and for coordinating with surrounding jurisdictions and other entities regarding noise control. By identifying noise-sensitive land uses and establishing compatibility guidelines for land use and noises, noise considerations will influence the general distribution, location, and intensity of future land uses. The result is that effective land use planning and mitigation can alleviate the majority of noise problems.

The Noise Element contains goals and policies that are intended to achieve the vision of the General Plan and guide the City's efforts to protect noise sensitive land uses and support the health and serenity of its citizens. The Noise Element goals and policies applicable to the Proposed Project are listed below.

Goal N 1: Land Use Conflicts: Minimize land use conflicts between various noise sources and other human activities.

Policy N1.1: Land Use Compatibility Guidelines: Revise the noise regulations of the Municipal Code to eliminate current ambient noise level standards in residential and commercial areas and replace them with Land Use Noise Compatibility Matrix (Table 3.14-5), to govern acceptable levels of noise for specific land uses and provide a baseline for mitigating land uses that exceed acceptable noise levels.

Table 3.14-5. City of Beverly Hills Land Use Noise Compatibility Matrix

Land Use Categories	Community Noise Equivalent Level (CNEL, dBA)			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Residential (Low Density, Single Family, Duplex, Mobile Homes)	50–60	55–70	70–75	75–85
Residential (Multiple Family)	50–65	60–70	70–75	70–85
Transient Lodging (Hotel, Motel)	50–65	60–70	70–80	80–85
Schools, Libraries, Churches, Hospitals, Nursing Homes	50–70	60–70	70–80	80–85
Auditoriums, Concert Halls, Amphitheaters	N/A	50–70	N/A	65–85
Sports Arenas, Outdoor Spectator Sports	N/A	50–75	N/A	70–85
Playgrounds, Neighborhood Parks	50–70	N/A	67.5–75	72.5–85
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50–70	N/A	70–80	80–85
Office Buildings, Business Commercial and Professional	50–75	67.5–77.5	75–85	N/A
Industrial, Manufacturing, Utilities, Agriculture	50–75	70–80	75–85	N/A

Source: City of Beverly Hills 2010

Policy N1.3: Limit Hours of Commercial and Entertainment Operations: Limit hours of commercial and entertainment operations adjacent to residential neighborhoods and other noise sensitive receptors in order to minimize exposure to excessive noise.

Policy N1.5: Noise Mitigation Measures: Require noise mitigation measures for noise-sensitive receptors when a significant noise impact is identified. A significant noise impact occurs when there is an increase in CNEL, as shown in Table 3.14-6.

Table 3.14-6. Noise Mitigation Measures	
Existing Noise Level CNEL dBA	**dBA Increase Over Existing**
55	3
60	2
65	1
70	1
Over 75	1

Source: City of Beverly Hills 2010

Goal N 2: Motor Vehicles: Minimized motor vehicle traffic noise impacts on sensitive noise receptors.

Policy N2.3: Limit Cut-Through Traffic: Continue Efforts to Discourage Traffic on Residential Streets.

Goal N 3: Non-Transportation Noise: Minimized motor vehicle traffic noise impacts on sensitive noise receptors.

Policy N3.1: Protection from Stationary Noise Sources: Continue to enforce interior and exterior noise standards to ensure that sensitive noise receptors are not exposed to excessive noise levels from stationary noise sources such as machinery, equipment, fans, and air conditioning equipment.

Policy N3.2: Regulation of Sound-amplifying Equipment: Continue to regulate the use of sound-amplifying equipment.

City of Beverly Hills Municipal Code

The City's regulations with respect to noise are included in Title 5, Chapter 1, *Noise Regulations*, of the City's Municipal Code. Specifically, Article 2 states that it is prohibited for any person within any residential zone of the city to use or operate any sound amplifying equipment between the hours of 10:00 p.m. and 8:00 a.m. to be distinctly audible at or beyond the property line of the property on which the equipment is located.

3.14.3 Prior Environmental Review

3.14.3.1 Previous Environmental Analysis

The noise impacts associated with the previous operational changes at the Virginia Robinson Gardens were evaluated in the following documents:

- *Draft Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (September 2012) – pages 96 through 107*
- *Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (May 2014)*
- *Recirculated Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (July 2014)*

3.14.3.2 Previously Identified Significant Project Impacts

The 2014 SEIR did not identify any significant project impacts to noise associated with the previous operational changes and therefore no mitigation measures were required.

3.14.3.3 Previously Identified Mitigation Measures

There were no mitigation measures identified in the 2014 SEIR because the impacts were considered less than significant.

3.14.4 Thresholds of Significance

Following Appendix G of the CEQA Guidelines, noise impacts are considered to be significant if the project would result in any of the following:

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;

b) Generation of excessive groundborne vibration or groundborne noise levels; or

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels.

3.14.5 Environmental Impacts

3.14.5.1 Construction

The Project is proposing to expand the use of the Gardens for increased public access and benefit by extending the hours of operations, increasing the types of programs offered, and increasing the number of daily visitors. No construction is proposed for the Project. Therefore, no construction-related impact would occur.

3.14.5.2 Operation

The Project is proposing to increase the number of Special Use Events occurring on the Project Site from 4 to 24 (up to 4 events per month) and increasing the maximum number of visitors per day from 100 to 200. Operational noise sources associated with the increased activity at the Gardens include mobile (i.e., traffic) and stationary (i.e., people talking, crowd noise, and amplified music) sources.

Operational Offsite Traffic Noise

Increasing the number of Special Use Events and daily visitors would result in additional traffic on adjacent roadways, thereby increasing vehicular noise in the Project vicinity. The Project Site is accessible from Elden Way. Future traffic noise levels as a result of Project operations on Project vicinity roadways were modeled based on the traffic volumes identified by KOA (2022). The calculated noise levels as at affected sensitive land uses a result of the Project are compared to the noise standards promulgated in the City of Beverly Hills General Plan Noise Element (Tables 3.14-5 and 3.14-6). Per General Plan Noise Element Policy N1.1, Land Use Compatibility Guidelines, the noise/land use compatibility standards identified in Table 3.14-5 govern acceptable levels of noise for specific land uses and provide a baseline for mitigating land uses that exceed acceptable noise levels. Noise Element Policy N1.5 establishes the increases in noise level that would be considered significant, based on existing noise level. For instance:

- For roadways that generate noise levels of less than 55 dBA CNEL under existing conditions, an increase in noise level that would cause the roadway to generate a noise level of 55 dBA CNEL or higher would be considered significant.
- For roadways that generate noise levels of 55.1 to 59.9 dBA CNEL under existing conditions, an increase of 3 dBA CNEL or more would be considered significant.
- For roadways that generate noise levels of 60 to 64.9 dBA CNEL under existing conditions, an increase of 2 dBA CNEL or more would be considered significant.
- For roadways that generate noise levels greater than 70 dBA CNEL under existing conditions, an increase of 1 dBA CNEL or more would be considered significant.

Table 3.14-7 shows the calculated offsite roadway noise levels under existing traffic levels compared to future conditions with an increase in daily visitors to the Project Site.

Table 3.14-7. Existing Plus Project Conditions - Predicted Traffic Noise Levels

Roadway Segment	Surrounding Uses	CNEL at 100 feet from Centerline of Roadway		Change in dBA	Noise Standard (dBA CNEL)	Exceed Standard
		Existing Conditions	Existing + Project Conditions			
North Beverly Drive						
North of Lexington Road	Residential	59.4	59.4	**0.0**	*>3.0 dBA increase*	**No**
South of Lexington Road	Residential	58.0	58.0	**0.0**	*>3.0 dBA increase*	**No**
North Crescent Drive						
South of Lexington Road	Residential	50.7	50.8	**0.1**	*>55 dBA*	**No**
Between Lexington Road and Elden Way	Residential	41.9	46.8	**4.9**	*>55 dBA*	**No**
Elden Way						
North of North Crescent Drive	Residential	39.1	45.7	**6.6**	*>55 dBA*	**No**
Lexington Road						
East of North Beverly Drive	Residential	52.5	52.6	**0.1**	*>55 dBA*	**No**
Between North Beverly Drive and Crescent Drive	Residential	54.6	54.8	**0.2**	*>55 dBA*	**No**
Between Crescent Drive and Oxford Way	Residential	55.7	55.7	**0.0**	*>3.0 dBA increase*	**No**
Between Oxford Way and Hartford Way	Residential	55.7	55.8	**0.1**	*>3.0 dBA increase*	**No**
Between Hartford Way and Benedict Canyon Drive	Residential	52.5	52.7	**0.2**	*>3.0 dBA increase*	**No**
West of Benedict Canyon Drive	Residential	53.9	53.9	**0.0**	*>55 dBA*	**No**
Oxford Way						
South of Lexington Road	Residential	41.3	41.3	**0.0**	*>55 dBA*	**No**
Hartford Way						
South of Lexington Road	Residential	42.1	42.1	**0.0**	*>55 dBA*	**No**

Table 3.14-7. Existing Plus Project Conditions - Predicted Traffic Noise Levels

Roadway Segment	Surrounding Uses	CNEL at 100 feet from Centerline of Roadway		Change in dBA	Noise Standard (dBA CNEL)	Exceed Standard
		Existing Conditions	Existing + Project Conditions			
Between Lexington Road and Cove Way	Residential	54.0	54.0	**0.0**	*>55 dBA*	**No**
Between Cove Way and Benedict Canyon Road	Residential	50.2	50.3	**0.1**	*>55 dBA*	**No**
West of Benedict Canyon Road	Residential	46.3	46.3	**0.0**	*>55 dBA*	**No**
Cove Way						
North of Hartford Way	Residential	55.4	55.5	**0.1**	*>3.0 dBA increase*	**No**
Benedict Canyon Drive						
South of Lexington Road	Residential	57.1	57.2	**0.1**	*>3.0 dBA increase*	**No**
Between Lexington Road and North Roxbury Drive	Residential	59.1	59.1	**0.0**	*>3.0 dBA increase*	**No**
North of Hartford Way	Residential	61.2	61.2	**0.0**	*>2.0 dBA increase*	**No**

Source: Traffic noise levels were calculated by ECORP using the FHWA roadway noise prediction model in conjunction with the trip generation rate identified by KOA (2022; Appendix F). Refer to Appendix E for traffic noise modeling assumptions and results.

As shown in Table 3.14-7, no roadway segment would experience an increase of noise beyond the City's significance standards as a result of the Project. Specifically, 12 of the Project vicinity roadway segments currently generate traffic noise levels of below 55 dBA CNEL; however, none of these roadway segments would generate traffic noise greater than 55 dBA CNEL as a result of the Project. Seven of the Project vicinity roadway segments currently generate traffic noise levels of 55 to 59.9 dBA CNEL; however, none of these roadway segments experience an increase in traffic noise of 3 dBA or greater. Lastly, one of the Project vicinity roadway segments currently generates traffic noise levels of 60 to 64.9 dBA CNEL and this roadway segment would not experience an increase in traffic noise of 2 dBA or greater. The Proposed Project's contribution of offsite traffic noise as a result of increased daily visitors would be less than significant.

Operational Onsite Stationary Noise

As previously described, the Project would expand the use of the Gardens to increase public access and benefit by extending the hours of operations and increasing the types of programs offered. This would result in an increase of daily visitors and the number of Special Use Events held per year. Maintenance operations on the Project Site, including operation of leaf blowers and other landscaping equipment, would be identical to existing conditions, and conditions on surrounding properties in the area, with implementation of the Project. No increase in maintenance or landscaping operations would occur.

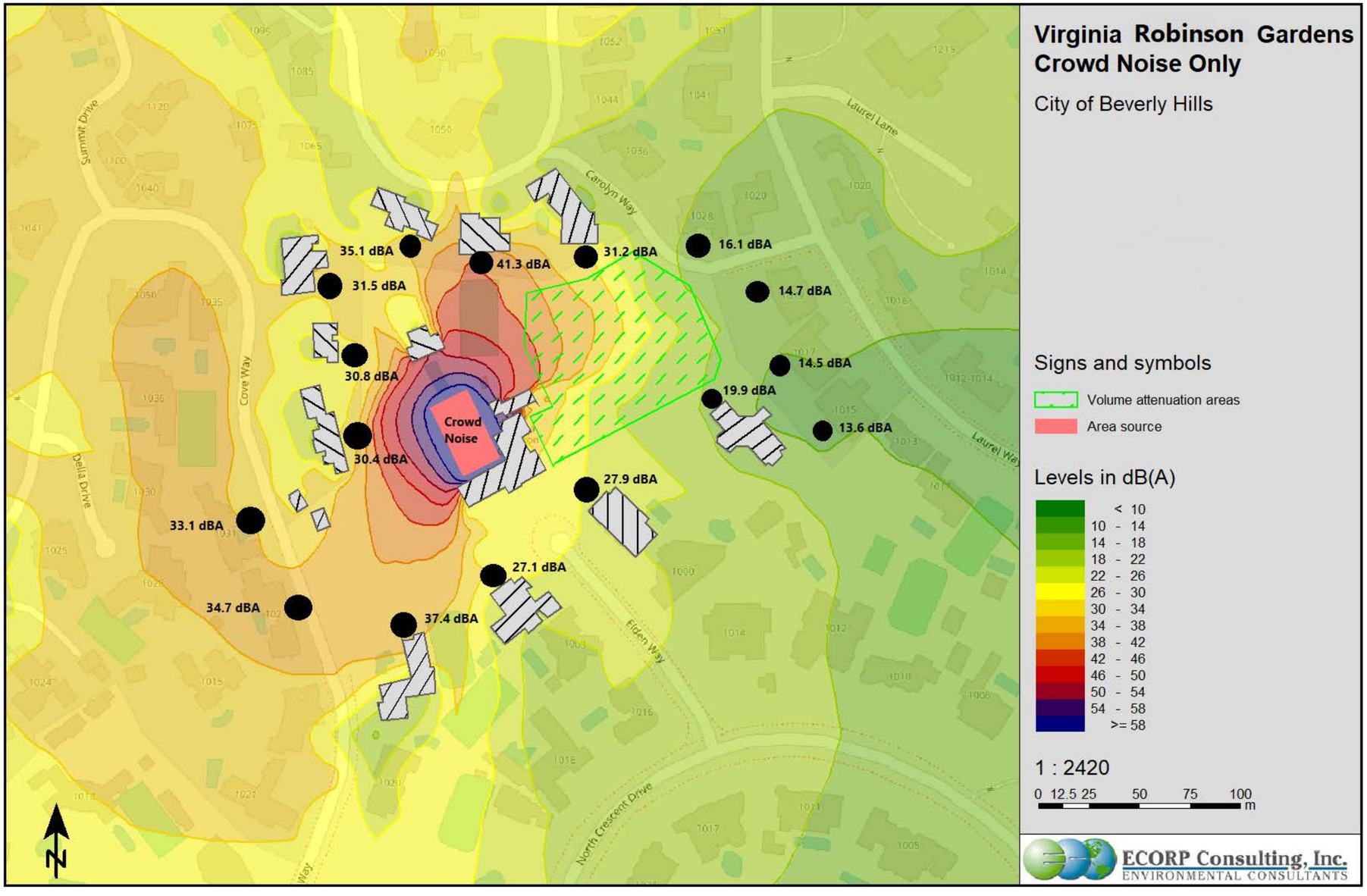
Onsite noise as a result of Special Use Event activities (i.e., amplified sound and crowd noise) has been calculated using the SoundPLAN 3D noise model, which predicts noise propagation from a noise source based on the location, noise level, and frequency spectra of the noise sources as well as the geometry and reflective properties of the local terrain, buildings, and barriers (Appendix E).

The main source of noise at Special Use Events would be produced from amplified sound systems; however, it is noted that not all Special Use Events would have amplified music. Noise levels from amplified sound systems vary considerably and depend upon the size of the area intended to be served, the crowd size, and the nature of the amplified sound (e.g., music versus voice announcements). To account for this variation, three separate SoundPLAN modeling calculations were conducted:

- The first modeling calculation accounts for an event with crowd noise but no amplified music within an area source dimension of 125 feet by 65 feet positioned between the pool and main house on the event lawn.
- The second modeling calculation accounts for moderate intensity amplified music (acoustical instruments with pickup amplifies) within an area source of 10 feet by 32 feet positioned directly adjacent to the main house as well as crowd noise within an area source 125 feet by 65 feet on the event lawn.
- The third modeling calculation accounts for high intensity amplified music (electrified, high energy, and fast tempo) within an area source of 10 feet by 32 feet positioned directly adjacent to the main house as well as crowd noise within an area source 125 feet by 65 feet on the event lawn.

Additionally, all modeling calculations include a volume attenuation area directly east of the main house and event lawn to account for the dense foliage in the area.

Modeled sound levels in the Project vicinity at the nearby residential properties as a result of Special Use Event scenarios described above are included in Table 3.14-8. Additionally, noise contour graphics (Figures 3-2 through 3-4) were prepared to depict the predicted noise levels in the Project vicinity. It is noted that Project noise modeling represents a worst-case scenario in which all potential Project noise sources are being generated at full intensity at the same moment. It is very unlikely that noise levels as a result of Special Use Event activities would reach that of those predicted in Table 3.14-8.



Map Date: 5/2/2022
Photo (or Base) Source: *SoundPLAN*

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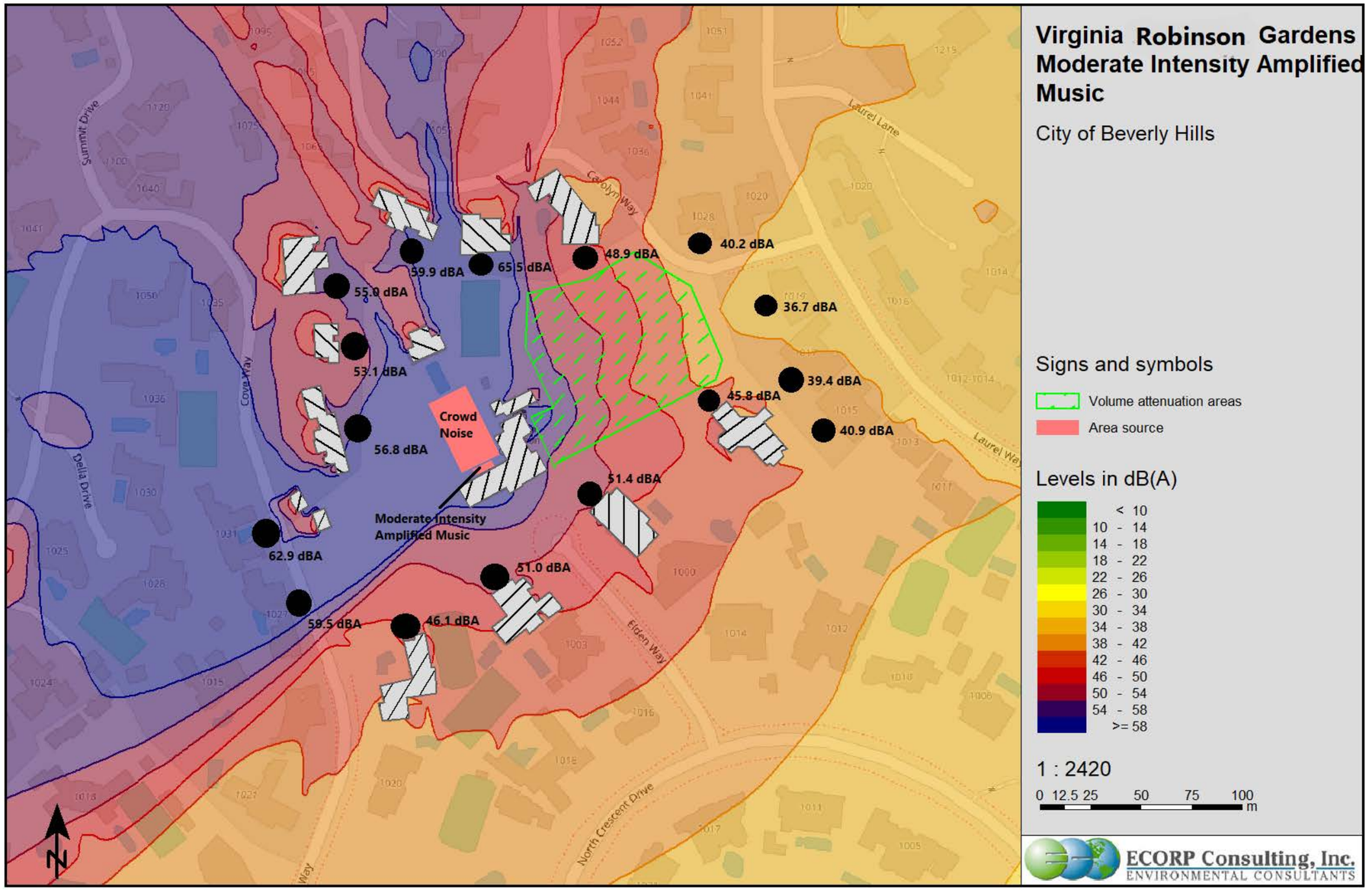
ENVIRONMENTAL CONSULTANTS

Figure 3-2. Modeled Operational Noise Levels: Crowd Noise Only

2017-276.009



Map Date: 5/2/2022
Photo (or Base) Source: *SoundPLAN*

ECORP Consulting, Inc.
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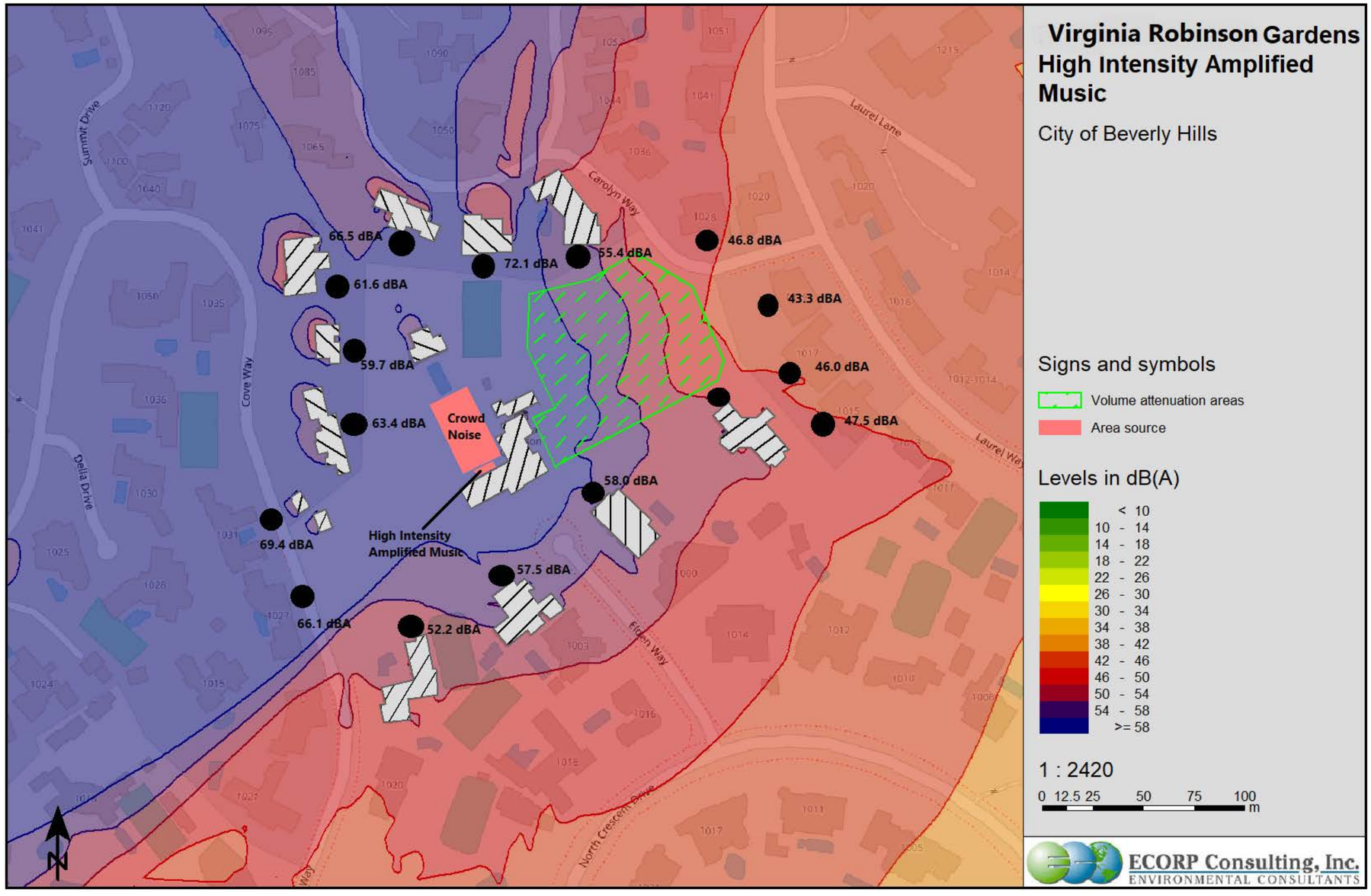
Figure 3-3. Modeled Operational Noise Levels: Moderate Intensity Amplified Music

2017-276.009



Map Date: 5/2/2022
Photo (or Base) Source: *SoundPLAN*

ECORP Consulting, Inc.
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Figure 3-4. Modeled Operational Noise Levels: High Intensity Amplified Music

2017-276.009

Table 3.14-8. Modeled Operational Noise Levels	
House Number/ Location	**Modeled Operational Noise Attributed to the Project (dBA L_{eq})**
Crowd Noise Only	
House 1025 (south of Project Site)	19.9 dBA L_{eq}
House 1006 (south of Project Site)	27.9 dBA L_{eq}
House 1005 (south of Project Site)	27.1 dBA L_{eq}
House 1024 (south of Project Site)	37.4 dBA L_{eq}
House 1027 (west of Project Site)	34.7 dBA L_{eq}
House 1031 (west of Project Site)	33.1 dBA L_{eq}
House 1032 (west of Project Site)	30.4 dBA L_{eq}
House 1034 (north of Project Site)	30.8 dBA L_{eq}
House 1036 (north of Project Site)	31.5 dBA L_{eq}
House 1055 (north of Project Site)	35.1 dBA L_{eq}
House 1045 (north of Project Site)	41.3 dBA L_{eq}
House 1035 (north of Project Site)	31.2 dBA L_{eq}
House 1028 (northeast of Project Site)	16.1 dBA L_{eq}
House 1019 (east of Project Site)	14.7 dBA L_{eq}
House 1017 (southeast of Project Site)	14.5 dBA L_{eq}
House 1015 (southeast of Project Site)	13.6 dBA L_{eq}
Crowd Noise with Moderate Intensity Amplified Music	
House 1025 (south of Project Site)	45.8 dBA L_{eq}
House 1006 (south of Project Site)	45.8 dBA L_{eq}
House 1005 (south of Project Site)	51.0 dBA L_{eq}
House 1024 (south of Project Site)	46.1 dBA L_{eq}
House 1027 (west of Project Site)	59.5 dBA L_{eq}
House 1031 (west of Project Site)	62.9 dBA L_{eq}
House 1032 (west of Project Site)	56.8 dBA L_{eq}
House 1034 (north of Project Site)	53.1 dBA L_{eq}
House 1036 (north of Project Site)	55.0 dBA L_{eq}
House 1055 (north of Project Site)	59.9 dBA L_{eq}
House 1045 (north of Project Site)	65.5 dBA L_{eq}
House 1035 (north of Project Site)	48.9 dBA L_{eq}
House 1028 (northeast of Project Site)	40.2 dBA L_{eq}
House 1019 (east of Project Site)	36.7 dBA L_{eq}
House 1017 (southeast of Project Site)	39.4 dBA L_{eq}
House 1015 (southeast of Project Site)	40.9 dBA L_{eq}

Table 3.14-8. Modeled Operational Noise Levels

House Number/ Location	Modeled Operational Noise Attributed to the Project (dBA L_{eq})
Crowd Noise with High Intensity Amplified Music	
House 1025 (south of Project Site)	52.4 dBA L_{eq}
House 1006 (south of Project Site)	58.0 dBA L_{eq}
House 1005 (south of Project Site)	57.5 dBA L_{eq}
House 1024 (south of Project Site)	52.2 dBA L_{eq}
House 1027 (west of Project Site)	66.1 dBA L_{eq}
House 1031 (west of Project Site)	69.4 dBA L_{eq}
House 1032 (west of Project Site)	63.4 dBA L_{eq}
House 1034 (north of Project Site)	59.7 dBA L_{eq}
House 1036 (north of Project Site)	61.6 dBA L_{eq}
House 1055 (north of Project Site)	66.5 dBA L_{eq}
House 1045 (north of Project Site)	72.1 dBA L_{eq}
House 1035 (north of Project Site)	55.4 dBA L_{eq}
House 1028 (northeast of Project Site)	46.8 dBA L_{eq}
House 1019 (east of Project Site)	43.3 dBA L_{eq}
House 1017 (southeast of Project Site)	46.0 dBA L_{eq}
House 1015 (southeast of Project Site)	47.5 dBA L_{eq}

Source: Stationary source noise levels were modeled by ECORP using SoundPLAN 3D noise model. Refer to Appendix E for noise modeling assumptions and results.
Notes: L_{eq} is the average acoustic energy content of noise for a stated period of time. Thus, the Leq of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure.

As shown in Table 3.14-8, noise as a result of Special Use Events occurring on the Project Site would range from:

- 13.6 to 41.3 dBA L_{eq} with crowd noise only
- 36.7 to 62.9 dBA L_{eq} with crowd noise and moderate intensity amplified music
- 43.3 to 72.1 dBA L_{eq} with crowd noise and high intensity amplified music at the nearby residential land uses

Noise generated as a result of Special Use Events occurring on the Project Site would be similar to existing conditions because the proposed types of special uses to be held at the Gardens would be similar to what currently occurs. Put differently, the three Special Use Event scenarios analyzed in Table 3.14-8 (no amplified music and crowd noise, moderate intensity amplified music [*acoustical instruments with pickup amplifies*], and high intensity amplified music [*electrified, high energy, and fast tempo*]), are currently allowed and occur at the Project Site under current conditions. The level of noise produced during an individual Special Use Event is not proposed to change. Therefore, noise generated at the Project Site

during a Special Use Event with implementation of the Proposed Project would be similar to what could currently occur. However, the frequency of Special Use Events would increase under the Proposed Project from four events to approximately 24 events annually. It is noted that the City's regulations with respect to noise (Title 5, Chapter 1, *Noise Regulations*, of the City's Municipal Code) state that it is prohibited for any person within any residential zone of the City to use or operate any sound amplifying equipment between the hours of 10:00 p.m. and 8:00 a.m. to be distinctly audible at or beyond the property line of the property on which the equipment is located. Therefore, the Project's noise-related effects associated with the increase in the frequency of Special Use Events would continue to be limited to the less noise-sensitive daytime hours.

The calculated operational noise levels associated with Special Use Events at the Project Site are identified in dBA L_{eq}, which is defined as the average acoustic energy content of noise for a stated period of time. This noise metric differs from dBA CNEL, which is a 24-hour average L_{eq} with "weighting" during certain hours to account for noise sensitivity in the evening and nighttime. The use of L_{eq} to characterize special event noise at the Project Site is appropriate since these events do not span over 24 hours. However, the City of Beverly Hills does not promulgate a noise limit in dBA L_{eq}. Therefore, while noise generated at the Project Site during a Special Use Event with implementation of the Proposed Project would be similar to what could occur during a currently-allowed Special Use Event, this analysis utilizes the City's noise/land use compatibility thresholds (see Table 3.14-5) for residential receptors in order to address the noise-related effect of increasing the frequency of special events from four events to approximately 24 events annually. As shown in Table 3.14-5, noise levels as high as 70 dBA at residences are considered to be conditionally acceptable.

As identified in Table 3.14-8, Special Use Event onsite noise would reach levels up to 62.9 dBA L_{eq} with crowd noise and moderate intensity amplified music and noise levels up to 72.1 dBA L_{eq} with crowd noise and high intensity amplified music at the nearby residential land uses. As a result, **Mitigation Measure NOI-1** is required to reduce onsite noise levels during Special Use Events with amplified music. Mitigation Measure NOI-1 would require that all property owners and occupants located within 500 feet of the Gardens' boundary be sent a notice at least five (5) days prior to commencement of all Special Use Events employing the use of amplified sound. Additionally, Mitigation Measure NOI-1 would reduce onsite Project noise by mandating that the sound amplification system at Special Use Events include a processor to control the maximum output of the speakers. All resulting noise emitted through speakers would be controlled to the maximum allowable level (80 dBA L_{max}) as measured at one meter (3.28 feet) from the source. L_{max} is the maximum noise level during the measurement period. Thus, limiting the maximum noise level output of all Special Use Event amplification systems to 80 dBA L_{max} as measured at one meter ensures the noise generated onsite attenuates to compatible levels at the surrounding residences during Special Use Events (as previously described, stationary source sound levels decrease (attenuates) at a rate of approximately six dB for each doubling of distance from the stationary source).

The Proposed Project would result in an increase in the number of days that Special Use Event noise is generated at Project Site yet would not increase the noise levels of these Special Use Events beyond current conditions. Therefore, noise generated at the Project Site during a Special Use Event with implementation of the Proposed Project would be generally the same as what could occur during a

special event currently. However, the requirements of Mitigation Measure NOI-1 are not currently required under existing conditions and thus certain Special Use Events under the Proposed Project could be less noisy than a similar special event under current conditions. Project Special Use Event noise, coupled with Mitigation Measure NOI-1 and the fact that special events do not span an entire day, is not excessive. The Proposed Project's contribution of stationary-sourced noise would result in a less than significant impact with mitigation.

Operational Ground-Borne Vibration

The Project would increase of the maximum allowed daily visitors and the number of Special Use Events held per year. Operational activities would be similar to existing operations, which do not utilize any vibration generating equipment. Therefore, the Project would have no impact on operational ground-borne vibration.

Excess Airport Noise

As previously described in the 2014 SEIR, the closest airport to the Project Site is the Santa Monica Airport located approximate five miles from the Project Site. As such, the Project Site is not located within the jurisdiction of an airport land use plan. However, the Project Site is frequently within the flight path of helicopters crisscrossing the City of Beverly Hills. The Project would not alter the existing flight path in the area and helicopters are prohibited on the Project Site. The Project does not propose any changes to the site and would not have any effect on helicopter traffic. Therefore, the Project would not affect airport operations nor result in increased exposure of employees or those visiting the site to aircraft noise. No impact would occur.

3.14.6 Mitigation Measures

NOI-1: A noise-reduction operations program shall be implemented prior to all Special Use Events employing the use of amplified sound:

- Property owners and occupants located within 500 feet of the Virginia Robinson Gardens boundary shall be sent a notice, at least five (5) days prior to commencement of all Special Use Events employing the use of amplified sound. All notices shall be reviewed and approved by the County of Los Angeles Department of Parks and Recreation prior to mailing and shall indicate the dates and duration of the upcoming special event, as well as provide a contact name and a telephone number where residents can inquire about the special event and register complaints.
- No Special Use Events shall take place outside of the allowable hours specified by the City of Beverly Hills Municipal Code Title 5, Chapter 1, Noise Regulations (10:00 p.m. through 8:00 a.m.).
- The sound amplification system accommodating Special Use Events with amplified music shall include a processor to control the maximum output of the speakers, so that even if a microphone were to be shouted into, the resulting sound power levels would be controlled to the maximum allowable level programmed into the processor. The

maximum output noise level shall be set to 80 dBA Lmax as measured at one meter (3.28 feet) from the source.

3.14.7 Residual Impacts After Mitigation

Project offsite traffic noise impacts are less than significant and do not require mitigation. Onsite operational impacts are less than significant with mitigation.

3.15 Population and Housing

3.15.1 Environmental Setting

According to the U.S. Census Bureau, the City of Beverly Hills' population was 32,701 people in 2020 (U.S. Census Bureau 2022). According to the Southern California Association of Governments Integrated Growth Forecast, the City's population is projected to be 36,600 people in 2035. The City is almost entirely built out and opportunities for growth are limited, as reflected in the growth projections identified above.

Until 1977, the Project Site served as a single-family residence for Virginia Robinson and her staff. Since her death, the buildings have remained largely unoccupied for residential uses, but portions (primarily the areas adjacent to the kitchen of the main residence) are used by Friends of Robinson Gardens volunteers who help restore and maintain the Gardens and manage educational and docent programs. An average of 6 volunteers are on site daily. In addition to the volunteers, approximately 10 maintenance staff are onsite per day. These volunteers and maintenance staff are generally on the Project Site during daytime hours only and do not live at the residence. However, one live-in caretaker lives at the Project Site fulltime.

3.15.2 Prior Environmental Review

3.15.2.1 Previous Environmental Analysis

The population/housing impacts associated with the 2014 operational changes at the Virginia Robinson Gardens were evaluated in the following documents:

- *Draft Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (September 2012) – pages 108 through 109*
- *Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (May 2014)*
- *Recirculated Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (July 2014)*

3.15.2.2 Previously Identified Significant Project Impacts

The 2014 SEIR did not identify any significant project impacts to population and housing associated with the previous operational changes at the Gardens.

3.15.2.3 Previously Identified Mitigation Measures

There were no mitigation measures identified in the 2014 SEIR because impacts were found to be less than significant.

3.15.3 Environmental Impacts

The Proposed Project would modify the existing operating schedule for the Virginia Robinson Gardens and would slightly increase the number of volunteers and employees at the Project Site. The hours of operation for the Project Site would be increased for four more hours in the summer and two more hours in the winter and extended an additional day (Sunday) each week (open to the public seven days per week compared to six). The number of allowable visitors per day would increase by 100 visitors per day. As such, the Proposed Project would increase the number of visitors on a daily and weekly basis.

Similarly, the number of attendees at Special Use Events would increase above the approximately 1,400 that currently occurs annually (4 events of approximately 350 guests each), and the number of Special Use Events would increase on site from 4 to 24 annually under the Proposed Project. This would increase the number of visitors to the site annually (a main goal of the Proposed Project). Attendance at Special Use Events is typically 350 guests per event, though current special events have no capped attendance. The Proposed Project would not include new residential development, change of land use, or construction of any kind that would induce population growth in the Project Area.

The number of employees and volunteers needed on site daily would increase proportionally to increased hours of operation, as approved by the Board of Supervisors. The existing live-in caretaker would continue to live on the Project Site, but no other permanent on-site residents would be added as a result of the Proposed Project. Under the Proposed Project, existing conditions would not be altered and the existing housing structure would not be displaced or demolished. Although the Proposed Project would increase the number of visitors at the Project Site, these visitors would be intermittent and would not represent an increase in permanent population. Therefore, the Proposed Project would result in a less than significant impact due to direct or indirect population growth.

3.15.4 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

3.15.5 Residual Impacts After Mitigation

Less than significant impacts would occur.

3.16 Public Services

3.16.1 Environmental Setting

The public services for the proposed operational changes are similar as those identified in the 2014 SEIR (County of Los Angeles 2012; 2014a; 2014b).

3.16.1.1 Fire Protection

The Beverly Hills Fire Department (BHFD) provides fire and emergency services within the City of Beverly Hills. The BHFD is comprised of five divisions and three fire stations. Station 2, located at 1100 Coldwater Canyon Drive, is the closest station to the Project Site. The City is almost entirely built out and the demand for fire services is currently met.

3.16.1.2 Police Protection

The Project Site is served by the Beverly Hills Police Department (BHPD). The BHPD is comprised of sworn officers and professional civilian support staff. The police station closest to the Project Site is located at 464 North Rexford Drive, approximately 1.3 miles south of the Project Site.

3.16.1.3 Schools

The Beverly Hills Unified School District (BHUSD) encompasses the Project Site and surrounding community. BHUSD consists of two TK-5 Elementary Schools, one 6-8 Middle School, one 9-12 High School, with a TK-12 enrollment of 3,200 (BHUSD 2022).

3.16.1.4 Parks

The Beverly Hills Recreation and Parks Department is generally responsible for planning, operating, and maintaining parkland in the City of Beverly Hills. Will Rogers Memorial Park is the closest city park to the Project Site. However, the Los Angeles County Department of Parks and Recreation owns, operates, and maintains the Project Site.

3.16.2 Prior Environmental Review

3.16.2.1 Previous Environmental Analysis

The public services impacts associated with the 2014 operational changes at the Virginia Robinson Gardens were evaluated in the following documents:

- *Draft Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (September 2012) – pages 109 through 113*
- *Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (May 2014)*

- *Recirculated Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (July 2014)*

3.16.2.2 Previously Identified Significant Project Impacts

The 2014 SEIR did not identify any significant project impacts to public services.

3.16.2.3 Previously Identified Mitigation Measures

There were no significant impacts associated with the previous operational changes. Therefore, no mitigation measures were identified in the 2014 SEIR.

3.16.3 Environmental Impacts

Generally, impacts associated with the provision of fire or police protection services would occur if a project would result in an increase in demand for these services to the extent that construction of new or expanded department facilities is required to maintain existing service levels. Typically, an increase in demand for these services is associated with a substantial increase in population in a service area or development of a previously undisturbed area requiring entirely new services. As described under Section 3.15, Population and Housing, the Proposed Project would not result in substantial population growth in the Project Area and therefore would not impact the population served by the BHFD and BHPD. The maximum number of people visiting the Project Site on a daily basis would increase from 100 to 200 visitors daily, which would be spread over a longer operating period. Additionally, the number of Special Use Events on the Project Site would increase from 4 to 24 annually; however, the number of allowed attendees per event would not increase from current attendees at Special Use Events. The increase in visitors at the Project Site would be intermittent, would be spread across the increased operational hours, and would not adversely affect existing service levels.

According to the Beverly Hills *Wildfire Hazard Area and Evacuation Routes Interactive Map*, the nearest evacuation route to the Project Site is Lexington Road, which serves as a secondary evacuation route, approximately 1,000 feet south of the Project Site (City of Beverly Hills 2022b). Lexington Road connects to Beverly Drive to the east and Benedict Canyon Drive to the west, which are both designated as primary evacuation routes. The Gardens' existing main entrance on Elden Way would serve as the primary emergency ingress and egress. Pedestrian access to and from the Project Site is available from Elden Way and Cove Way. The Project does not propose to modify existing access or circulation such that fire and police access would be adversely affected.

The County would coordinate with the Gardens staff and City of Beverly Hills to expedite evacuation in the event of a wildfire or other emergency event. Prior to each Special Use Event, the event operator and Gardens staff would coordinate with the Parks Bureau of the Los Angeles County Sheriff's Department in its preparation and implementation of an Operations Plan for police protection services to be provided by the County to supplement the private security being provided by the event operator. 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.

Furthermore, the number of employees would slightly increase as a result of the Proposed Project (at the discretion of the County Board of Supervisors); however, daily and event volunteers live primarily in the City of Beverly Hills and would not be moving nearby, such that the school-age population would increase. The increase in visitors at the Project Site would be intermittent and would not affect demand for school or recreational facilities in the project area.

3.16.4 Mitigation Measures

No significant impacts have been identified; therefore, no mitigation measures are required.

3.16.5 Residual Impacts After Mitigation

Project impacts would be less than significant.

3.17 Recreation

3.17.1 Environmental Setting

The recreational opportunities in the City of Beverly Hills remain similar to those described in the 2014 SEIR (County of Los Angeles 2012; 2014a; 2014b). The Beverly Hills Recreation and Parks Department is generally responsible for planning, operating, and maintaining parkland in the City of Beverly Hills. Will Rogers Memorial Park is the closest City park to the Project Site, located approximately 0.4-mile southeast. However, the Los Angeles County Department of Parks and Recreation owns, operates, and maintains the Project Site.

The Gardens provides extensive educational programs for Title I schools and students; an outdoor classroom for hosting lectures on climate appropriate plants, green waste issues, and gardening techniques for the local residents; and a venue for historical lectures and book clubs. Furthermore, the Gardens provides a park space for family events such as birthdays and special occasions.

3.17.2 Prior Environmental Review

3.17.2.1 Previous Environmental Analysis

Recreation impacts associated with the 2014 operational changes at the Virginia Robinson Gardens were evaluated in the following documents:

- *Draft Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (September 2012) – pages 113 through 114*
- *Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (May 2014)*
- *Recirculated Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (July 2014)*

3.17.2.2 Previously Identified Significant Project Impacts

The 2014 SEIR did not identify any significant impacts to recreation resources.

3.17.2.3 Previously Identified Mitigation Measures

The 2014 SEIR found that there would be no impact on the environment from the previously proposed operational changes and no mitigation was required.

3.17.3 Environmental Impacts

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 up to twenty additional Special Use Events annually. As the operational hours are currently restricted to just 6.5 hours a day, six days a week, the Gardens have a limited ability to fulfill the mission of Virginia Robinson's bequeathment to the County. By allowing the Gardens to welcome the public until sunset, as most other public gardens and parks do, students and the public would be granted greater access. The proposed extended hours would also allow the Gardens to develop an afterschool program for children and allow families to visit the Gardens after school or work. Additionally, the Gardens would be able to offer more science and botanical education programs to Title I schools. As such, the Proposed Project would increase the public availability and use of the Project Site, including the botanical gardens and grounds. This increase in public availability resulting from the Proposed Project would remain within the original intent and boundaries set forth by the Robinson Will. The proposed increase in the number of maximum daily visitors would be spread over the increased hours of operations and additional day.

The Proposed Project would also increase in the number of Special Use Events at the Gardens from four to 24 per year. 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.

The Proposed Project would increase public access to the Project Site, while maintaining the visual and historic integrity of the property. The Proposed Project would increase recreational opportunities for the public, resulting in a beneficial impact to recreation. 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 additional recreational facilities. Impacts would remain less than significant.

3.17.4 Mitigation Measures

No significant impacts have been identified; therefore, no mitigation measures are required.

3.17.5 Residual Impacts After Mitigation

A beneficial impact would occur.

3.18 Transportation

In July 2022, KOA Corporation (KOA) prepared a Traffic Impact Analysis to analyze the circulation and traffic conditions associated with the Proposed Project (KOA 2022; Appendix F). The analysis presents findings pertaining to CEQA impact review and application of local criteria to an area circulation analysis. The analysis was executed in consultation with the assumptions, methodologies, and procedures outlined in the *City of Beverly Hills Traffic Impact Analysis Guidelines* adopted October 10, 2019. A traffic scoping document was submitted to the City of Beverly Hills engineering staff, on January 19, 2022, and the City provided no comments. Eight intersections were defined as the study area. The analysis is provided in Appendix F and summarized below.

3.18.1 Environmental Setting

3.18.1.1 Existing Roadway System

The roadways within the study area are described here. The discussion is limited to specific roadways that traverse the study intersections and provide direct access to the Project Site.

- **North Crescent Drive** is a local roadway with an unmarked lane in each direction. Two-hour parking is generally permitted on both sides of the road. The speed limit is unposted and therefore a 25-mph prima facie speed applies.
- **Lexington Road** is a local roadway with one lane in each direction separated by a double-yellow striped median. Two-hour parking is generally permitted on both sides of the road. The posted speed limit is 25 mph.
- **Hartford Way** is a local roadway. Parking is prohibited on the southbound side of the road and 2-hour parking is allowed on the northbound side of the road.
- **Elden Way** is a local roadway. The street ends in a cul-de-sac at the Project Site. Parking is generally permitted on both sides of the street. A 25-mph prima facie speed applies.
- **Beverly Drive** is a major roadway. Parking is generally permitted on both sides of the roadway with the exception of 7:00 to 10:00 a.m. on the southbound side of the road and 4:00 to 7:00 p.m. northbound side of the road. The posted speed limit is 25 mph. In the vicinity of the Project, Beverly Drive is residential. Beverly Drive begins its residential character at Santa Monica Boulevard to the south and transitions into Coldwater Canyon to the north.
- **Oxford Way** is a local roadway. Parking is prohibited on the southbound side of the road and 2-hour parking is allowed on the northbound side of the road. A 25-mph prima facie speed applies.
- **Benedict Canyon Drive** is a major roadway. Parking is generally permitted on both sides of the roadway with the exception of the 7:00 to 9:00 a.m. period in the southbound direction and the 4:00 to 7:00 p.m. period in the northbound direction. Benedict Canyon Drive intersects with numerous arterials including Santa Monica Boulevard, Wilshire Boulevard, and Mulholland Drive, which connect to Interstate 405 for regional access.

3.18.1.2 Facility Operations

The traffic and parking conditions for the Gardens have not substantially changed since the completion of the 2014 SEIR (County of Los Angeles 2012; 2014a; 2014b). Under current operations, the Gardens attracts regional attendance by visitors and students, with travel primarily by vehicle and school bus. Special Use Event attendance is typically 350 persons. Special Use Event parking management is based on the total number of guests expected. All Special Use Events currently require a parking/transportation plan to be submitted to and approved by the City of Beverly Hills.

For smaller events, up to 35 vehicles can be parked on the Project Site with stacked parking. A pick-up/drop-off operation is also used as needed, where the driver drops off the guest and is on call for pickup. This ensures that guests are picked up by the same driver and in the same car when they leave. There is no street parking allowed. No parking is permitted to occur on Elden Way, by either event guests or valet parking staff.

Valet parking is used for Special Use Events that are larger. All events include an application for a valet permit and a special use event permit from the City of Beverly Hills. A street parking permit is issued by the City. Off-site parking is also made available for some events, so that guests can be shuttled to the Project Site and the need for on-street parking by valets can be reduced or eliminated, depending on the event plan.

Setup and deliveries for special use events is tightly regulated and scheduled by the County and the Friends of the Virginia Robinson Gardens working in tandem to minimize the effect on the surrounding neighbors. Vendors are assigned arrival and load out times. Prior to the event, they receive a packet of information on the dimensions of the driveway and the address for offsite parking, etc. Preferred rental companies and vendors are used. For party rental trucks, which are the largest delivery trucks, it is required that these vehicles park along Crescent Drive on the north side and use a smaller truck to shuttle the rental items to the Project Site. Loading out is not permitted on Sundays after Saturday events. Whenever possible, back-to-back events use the same setup to reduce load-in and load-out by 50 percent.

3.18.2 Prior Environmental Review

3.18.2.1 Previous Environmental Review

Transportation impacts associated with the 2014 operational changes at the Virginia Robinson Gardens were evaluated in the following documents:

- *Draft Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (September 2012) – pages 114 through 127*
- *Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (May 2014)*

- *Recirculated Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (July 2014)*

3.18.2.2 Previously Identified Significant Project Impacts

The 2014 SEIR included a review of the City of Beverly Hills thresholds and analysis of project traffic impacts. In summary, this analysis determined that the addition of approximately 160 project trips on Saturdays on Elden Way would result in an increase greater than the City's local threshold of 16 percent, resulting in a significant impact, by percentage. The use of off-site parking opportunities was found to be not feasible, and the operational changes were determined to result in a significant and unavoidable traffic impact that was not previously identified in the 2014 SEIR. However, this impact did not create an operational impact along Elden Way or the surrounding intersections. A Statement of Overriding Considerations was adopted in 2014 by the County Board of Supervisors for this traffic impact.

3.18.2.3 Previously Identified Mitigation Measures

The 2014 operational changes resulted in a significant and unavoidable traffic impact and no feasible mitigation was identified. Appendix G of the 2014 SEIR presented the potential use of off-site parking options; however, these options were determined to be infeasible.

3.18.3 Thresholds of Significance

Effective July 1, 2020, the longstanding metric of roadway level of service (LOS), which is typically measured in terms of vehicle delay, roadway capacity and congestion, is no longer be considered a significant impact under CEQA. Pursuant to CEQA Guidelines, Section 15064.3, vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts. VMT refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel. Except as provided in subdivision 15064.3(b)(2) of the CEQA Guidelines, regarding roadway capacity, a project's effect on automobile delay cannot constitute a significant environmental impact. The City of Beverly Hills has prepared *Local Transportation Assessment Guidelines*, detailing the appropriate VMT methodologies, thresholds of significance, and feasible mitigation measures. These thresholds and related policies are consistent with State CEQA Guidelines. The site-specific traffic analysis follows the practices and recommendations in the City's Local Transportation Assessment Guidelines and includes an LOS impact analysis for informational purposes.

3.18.3.1 City of Beverly Hills Local Street Threshold

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 increase peak hour trips by 16 percent, or both.

3.18.4 Environmental Impacts

The Project Site is located approximately 0.5 mile north of Sunset Boulevard within a residential neighborhood. The primary Project Site access is located on the north end of a cul-de-sac at the terminus of Elden Way. The Project study area included the following eight study intersections located along the primary access routes to and from the Project Site (Figure 3-5):

1. Beverly Drive and Lexington Road
2. Crescent Drive and Lexington Road*
3. Elden Way and Crescent Drive*
4. Oxford Way and Lexington Road*
5. Hartford Way and Lexington Road*
6. Hartford Way and Cove Way*
7. Benedict Canyon Drive and Roxbury Drive*
8. Benedict Canyon Drive and Lexington Road

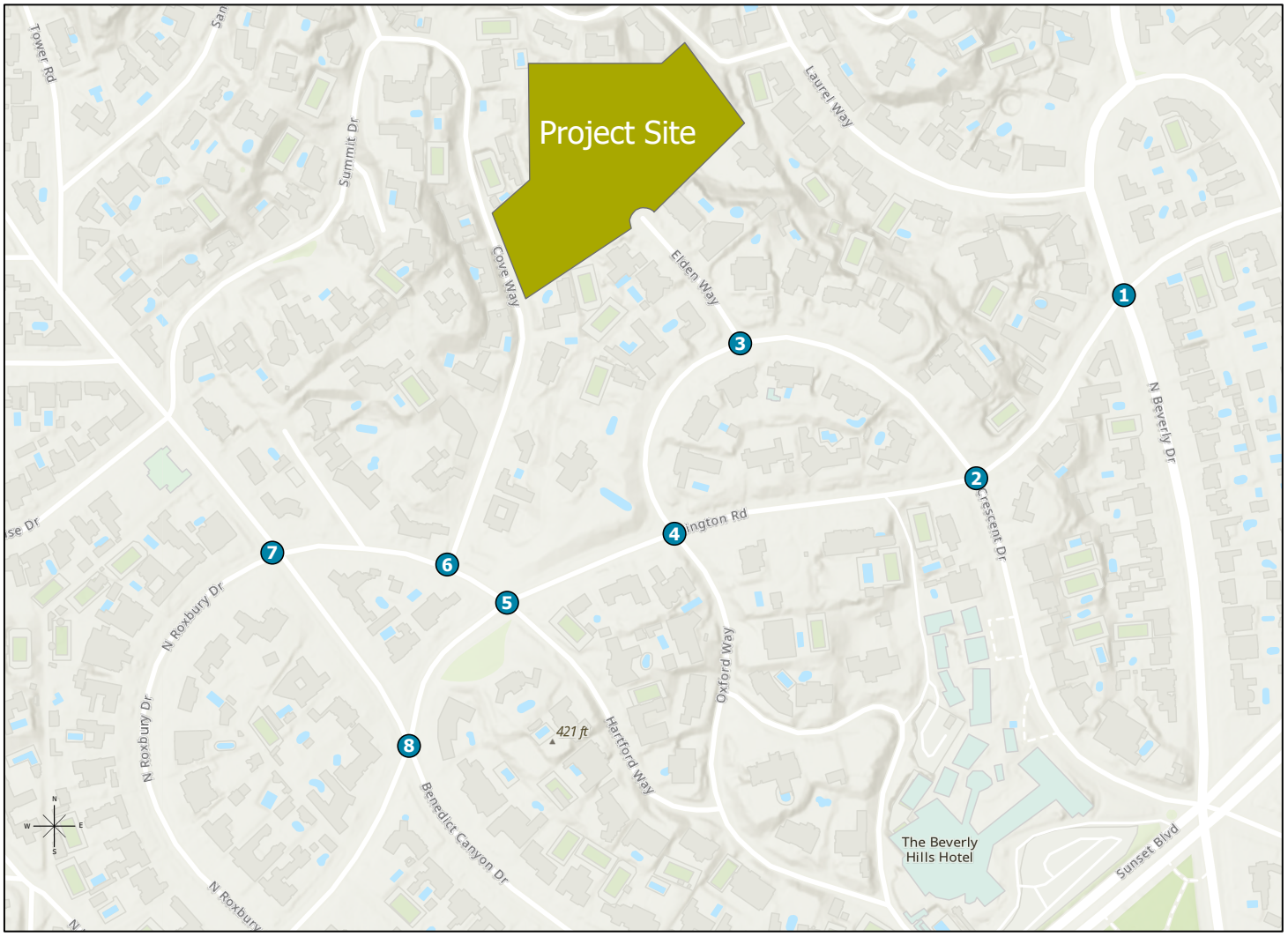
**Unsignalized Intersection*

3.18.4.1 Project Trip Generation

The Proposed Project's trip generation was calculated by determining the increase in visitors from existing conditions to the estimated level of operations under the proposed operating program. The trip generation also considered the hours of operation in the calculation of trips and 8.5 hours for an average length of site operations ending at sunset.

Existing operations data provided by the County indicates that the typical average annual attendance is 5,000 visitors, which equates to an average of 20 visitors a day. There is an average of two persons per arriving vehicle, and therefore an average of 10 visitor vehicle round trip movements per day. The designated maximum site capacity for reservations is 100 visitors per day for all Gardens site activities including tours, meetings, seminars/classes, events or commercial filming. The Gardens has 35 parking spaces available.

The trips analysis was based on capacity operations. With the current advance reservations system, which would remain operational for the Proposed Project operations, the existing 100 daily visitors limit would be raised to 200 visitors spread over a longer operating period. The daily operational period would be extended further into the evening, until sunset rather than 4:00 p.m., and Sunday operations would be included in the typical weekly schedule.



Source: KOA 2022

ECORP Consulting, Inc.
ENVIRONMENTAL CONSULTANTS

Figure 3-5. Study Intersections

2017-276.009 Virginia Robinson Gardens

The daily visitor increase of 100 was used as the input for the trip generation calculations, and assumed two persons per vehicle. A conservative total for peak hour values was calculated by multiplying by a factor of two the average hourly trips across a typical 8.5-hour facility operations timeframe. The Proposed Project would generate a net daily total of 100 net new trips, including 25 vehicle trips during both the weekday a.m. peak hour and the p.m. peak hour (two persons per vehicle were assumed, with 50 trips in and 50 trips out on a daily basis). See Table 3.18-1 below.

Table 3.18-1. Proposed Project Traffic Counts

	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
Existing Volume	180	170	210	210	150	175
Current VRG Project	50	50	50	50	50	50
Total with Current Project	**230**	**220**	**260**	**260**	**200**	**175**
Proposed Project	100	100	100	100	100	100
Percentage Increase	**43%**	**45%**	**38%**	**38%**	**50%**	**57%**

Notes: Daily vehicle trips provided by KOA (2022; Appendix F). The 2014 SEIR did not include Mondays as the Gardens were not open that day. The 2014 SEIR Proposed Project included expanding the days of operation from Monday to Saturday (2 additional days). Therefore, no data is available for comparison for Mondays. Existing operations data indicate that Mondays typically have fewer visitors than other days of the week, resulting in less traffic to the Project Site.

This analysis also conservatively assumes that all visitors would travel to and from the Project Site via private vehicles. In reality, some visitors would be using other modes of travel, including school buses, vans, and public buses, which could accommodate more than two persons per vehicle.

Level of Service Impacts

For analysis of Level of Service (LOS) at signalized and unsignalized intersections, the City of Beverly Hills has designated the Highway Capacity Manual (HCM) methodology as the desired tool. The HCM methodology determines intersection LOS based on operational delay. For signalized intersections, the operational delay corresponds to the overall delay for all movements at the intersection, whereas for two-way stop-controlled intersections, the operational delay corresponds to the delay only for the stop-controlled movements. Level of service values range from LOS A to LOS F. LOS A indicates excellent operating conditions with little delay to motorists, whereas LOS F represents congested conditions with excessive vehicle delay. LOS E is typically defined as the operating capacity of a roadway.

Based on the intersection control and lane configurations and the existing traffic volumes, existing average vehicle delay and corresponding LOS were determined for peak hours for each of the study intersections. Most of the study intersections operate at LOS D or better during the a.m. and p.m. peak hours. Two of the study intersections currently operate at LOS F during peak hours:

- **Beverly Drive and Lexington Road** currently operates at LOS F during the a.m. peak hour.

- **Benedict Canyon Drive and North Roxbury Drive** currently operates at LOS F during the a.m. and p.m. peak hour.

Two of the study intersections would continue to operate at LOS F under the Proposed Project, with one intersection experiencing less than significant deterioration (Benedict Canyon Drive and North Roxbury Drive) in this scenario:

- **Beverly Drive and Lexington Road** would operate at LOS F during both a.m. peak hour in the Future Without-Project scenario and would continue to operate at LOS F in the future with-Project scenario during the a.m. peak hour, with increases in average vehicle delay of 0.2 seconds and 0.3 seconds in the peak hours. The Project would not cause substantial changes in delay at this location based on the thresholds in the traffic analysis guidelines.
- **Benedict Canyon Drive and North Roxbury Drive** would operate at LOS F during the a.m. and p.m. peak hour periods and would continue to operate at LOS F in the future with-Project scenario during the a.m. and p.m. peak hour. The with-Project volumes would increase average vehicle delay by 1.3 seconds during the a.m. peak hour period and 0.4 seconds during the p.m. peak hour period and would not cause substantial changes in delay based on the thresholds in the traffic analysis guidelines.

Project circulation effect improvement measures are not necessary, based on this analysis. A less than significant impact would occur.

Beverly Hills Local Street Threshold Analysis

Based on the Project trip generation analysis, the net new daily vehicle trips would be 100. Based on traffic counts on Elden Way conducted for the 2014 SEIR environmental analysis, volumes on that roadway range from 150 to 275 vehicles each day. The current Project operations add 50 vehicles per day to the same segment, based on 100 daily visitors, an assumption of two persons per vehicle, and one inbound trip and one outbound trip. The Project addition of up to 100 additional vehicles each day on that roadway would cause increases in volumes that range from 38 percent to 57 percent. The City maximum impact threshold would be exceeded every day of the week.

Feasible physical improvements for this local roadway volume impact were not identified, nor were feasible project mitigation measures identified that would reduce the number of Project trips to a level where the local impact is less than significant. This impact would be significant and unavoidable.

Analysis of Project Vehicle Miles Traveled

Project implementation would increase daily VMT due to the addition of daily visitors to the Project Site. Project increases in visitor VMT would occur with the opening of additional tour reservation slots and the allowance of additional school field trips and use of site educational programs, with the Proposed Project. According to the site-specific traffic impact analysis, daily VMT of the Gardens is 1,710 under existing conditions and would be 3,400 under the proposed operational changes. The VMT standard is average VMT per capita, based on the analysis of visitor data and the local CEQA impact standards.

The City of Beverly Hills CEQA transportation impact thresholds requires VMT for land use projects to be analyzed against a threshold of VMT that exceeds a level of 15 percent below the existing regional or city VMT per capita and per employee, respectively. The current average VMT per capita, a measure of residential-based trips to other destinations such as commercial areas and cultural or recreational uses such as the project use, is 22.2 for the County of Los Angeles. The threshold of 15 percent below this regional average VMT would be 18.87.

Table 3.18-2. Existing Vehicle Miles Traveled (VMT) Project Data

Zone (Miles)	Count	VMT (One-Way)	VMT (Round-Trip)	Persons in Vehicles	VMT per Capita – Vehicle Trips
1.25	0	0	0	0	0.0
2.5	6	15	30	12	2.5
5	18	90	180	36	5.0
10	18	180	360	36	10.0
15	7	105	210	14	15.0
20	7	140	280	14	20.0
25	1	25	50	2	25.0
30	1	30	60	2	30.0
35	1	35	70	2	35.0
40	2	80	160	4	40.0
45	0	0	0	0	0.0
50	9	450	900	18	0.0
55	1	55	110	2	55.0
Totals	**71**	**1,205**	**2,410**	**142**	
Average: 17.0					

Note: Persons in Vehicles defined by existing data and trip patterns, and an average vehicle occupancy of 2.0

As described in the site-specific traffic impact analysis, daily VMT of the Gardens is 1,710 with existing conditions and would be 3,400 with the Proposed Project. The VMT standard is average VMT per capita, based on the analysis of visitor data and the local CEQA impact standards. VMT transportation impacts of the Project would be less than significant, as the average VMT per capita (17.0) would be below the impact threshold (18.87). As such, a less than significant impact would occur.

Consistency with the SCAG RTP/SCS

City of Beverly Hills CEQA transportation guidelines require the review of a project consistency with the Regional Transportation Improvement Plan/Sustainable Communities Strategy (RTP/SCS). A significant cumulative impact is defined if a review indicates that there is inconsistency with the Southern California Association of Governments (SCAG) RTP/SCS. According to the site-specific traffic impact analysis, the Proposed Project is consistent with the goals of the RTP/SCS, in that the expansion of the facility operations would provide more opportunities for access to the site's educational and cultural amenities, rather than creating a new development for these activities at a new site.

Transit access is available in the area, but it is located at the limit of walkability for many. The nearest Metro bus stop on Sunset Boulevard is 0.5 mile from the Project Site; approximately a 10-minute walk. The Proposed Project, by necessity of operations and minimization of area parking and circulation impacts, only allows for visits to the Project Site through reservations tied to the available off-street parking at the Project Site. The system promotes carpooling and use of other travel modes when available, while an open parking lot might otherwise encourage more single occupant driving and less use of other modes. Therefore, the Project would meet these RTP/SCS goals without the need for mitigation measures. The Project, based on the VMT analysis above, also would not increase the average VMT within the City when compared to a No Project alternative. For these reasons, cumulative impacts would be less than significant.

Parking Analysis

In December 2009, the California Natural Resources Agency amended the CEQA Guidelines and the Appendix G Checklist to eliminate the checklist question regarding parking capacity. Case law recognizes that parking impacts are not necessarily environmental impacts (*San Franciscans Upholding the Downtown Plan v. City and County of San Francisco, supra, 102 Cal.App.4th at 697*). The focus of the CEQA analysis, rather, is on direct and indirect physical impacts of a project on the environment. Parking is usually a social and not an environmental impact, unless there are secondary adverse physical effects on the environment resulting from a project's impact on available parking (*Save Our Access – San Gabriel Mountains vs. Watershed Conservation Authority, 68 Cal.App.5th 8)*. Therefore, parking is not typically an environmental impact requiring analysis in a CEQA document (California Natural Resources Agency 2009). Nonetheless, given that the Project Site is surrounded by narrow neighborhood streets, parking issues will still be addressed qualitatively in this SEIR.

The Proposed Project does not include new changes to the physical environment related to parking, such as construction of new parking on- or off-site. Parking at the Gardens is currently limited to 35 spaces on-site and walk-in access with some exceptions for oversized vehicles and tour buses. Currently, the largest challenge with parking is the public using nearby neighborhood streets for parking, which causes congestion. To offset this, the County proposes to promote the use of public transportation services and rideshare services such as Lyft or Uber. The proposed advertisements do not include new physical signage, markings, or other parking-related changes. The proposed activity is a promotional approach to encourage outside transportation services with the intent of reducing vehicle activity on and near the

Project Site. Furthermore, reservations will still be required for daily visitors, which limits the number of patrons allowed at the same time, therefore mitigating an overflow or capacity issue within the Gardens.

Special Use Events would comply with City ordinances, and valet service must obtain City parking permits for use of public streets to avoid overlapping events with surrounding neighbors. The current requirement of an event-specific traffic and parking plan would remain. No additional cars would be allowed to park on the street under the Proposed Project than are currently allowed. Parking associated with the Gardens is not allowed on Elden Way. These measures occur now with the current Special Use Events that occur at the Gardens. With the expanded number of events, these measures would continue to be used, minimizing the temporary effects of the special events on area traffic patterns and on-street parking occupancy. No mitigation measures are proposed for Project Special Use Events based on these conclusions. Impacts would be less than significant.

3.18.5 Mitigation Measures

Feasible physical improvements for the local roadway volume impact on Elden Way were not identified, nor were feasible project mitigation measures identified that would reduce the number of Project trips to a level where the local impact is not significant.

3.18.6 Residual Impacts After Mitigation

The Proposed Project's impact to local roadways (Elden Way) would be significant and unavoidable.

3.19 Tribal Cultural Resources

3.19.1 Environmental Setting

3.19.1.1 Assembly Bill 52

Effective July 1, 2015, Assembly Bill 52 (AB 52) amended CEQA to require that: 1) a lead agency provide notice to those California Native American tribes that requested notice of projects proposed by the lead agency; and 2) for any tribe that responded to the notice within 30 days of receipt with a request for consultation, the lead agency must consult with the tribe. Topics that may be addressed during consultation include tribal cultural resources (TCRs), the potential significance of project impacts, type of environmental document that should be prepared, and possible mitigation measures and project alternatives.

Pursuant to AB 52, Section 21073 of the Public Resources Code defines California Native American tribes as "a Native American tribe located in California that is on the contact list maintained by the Native American Heritage Commission (NAHC) for the purposes of Chapter 905 of the Statutes of 2004." This includes both federally and non-federally recognized tribes.

Section 21074(a) of the Public Resource Code defines TCRs for the purpose of CEQA as:

1. Sites, features, places, cultural landscapes (geographically defined in terms of the size and scope), sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

    a. included or determined to be eligible for inclusion in the California Register of Historical Resources; and/or

    b. included in a local register of historical resources as defined in subdivision (k) of Section 5020.1; and/or

    c. a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

Because criteria a and b also meet the definition of a historical resource under CEQA, a TCR may also require additional consideration as a historical resource. TCRs may or may not exhibit archaeological, cultural, or physical indicators.

Recognizing that California tribes are experts in their tribal cultural resources and heritage, AB 52 requires that CEQA lead agencies provide tribes that requested notification an opportunity to consult at the commencement of the CEQA process to identify TCRs. Furthermore, because a significant effect on a TCR is considered a significant impact on the environment under CEQA, consultation is used to develop appropriate avoidance, impact minimization, and mitigation measures.

3.19.2 Prior Environmental Review

3.19.2.1 Previous Environmental Analysis

Impacts to tribal cultural resources were not evaluated in previous environmental documents.

3.19.2.2 Previously Identified Significant Project Impacts

The 2014 SEIR did not identify any significant project impacts to tribal cultural resources associated with the previous operational changes because the impacts were not evaluated.

3.19.2.3 Previously Identified Mitigation Measures

There were no mitigation measures identified in the 2014 SEIR because the impacts were not evaluated.

3.19.3 Thresholds of Significance

Following Appendix G of the CEQA Guidelines, tribal cultural resource impacts are considered to be significant if the project would result in any of the following:

a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

   i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or

   ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.

3.19.4 Environmental Impacts

On October 12, 2021 the County sent Project notification letters with invitations to consult on the Project to representatives of the following five tribes:

- San Gabriel Band of Mission Indians
- Tejon Indian Tribe
- Fernandeño Tataviam Band of Mission Indians
- San Manuel Band of Mission Indians
- Gabrieleno Band of Mission Indians – Kizh Nation

On October 13, 2021 the Fernandeño Tataviam Band of Mission Indians (FTBMI) responded stating that the Project is situated outside the tribe's ancestral boundaries. The FTBMI deferred consultation for the Project to members of the Gabrieleno Tribe. No other tribes requested consultation nor expressed any concerns about the Project to the County. No construction or demolition is proposed, therefore no impact to TCRs would occur.

3.19.5 Mitigation Measures

No significant impacts have been identified; therefore, no mitigation measures are required.

3.19.6 Residual Impacts After Mitigation

No impact would occur.

3.20 Utilities and Services Systems

3.20.1 Environmental Setting

3.20.1.1 Water Service

Water is supplied to the City of Beverly Hills, including the Project Site, by Metropolitan Water District (MWD). In addition, the City extracts and treats groundwater from the Hollywood Subbasin as a partial alternative to water provided by MWD. By 2025, it is expected that local groundwater supply will increase to 25 to 30 percent of the total demand. According to the City's 2020 Urban Water Management Plan (UWMP), the City anticipates being able to meet water demand with adequate supplies through the year 2045 under normal, dry, and multiple dry year conditions (City of Beverly Hills 2020).

3.20.1.2 Sewer Service

Wastewater discharged from the Project Site is conveyed via existing wastewater systems to the Hyperion Treatment Plant in the City of Los Angeles. The Hyperion Treatment Plant, operated by the Los Angeles County Sanitation Districts (LASAN), has a dry weather capacity of 450 million gallons per day (mgd) for full secondary treatment and peak wet weather flow of 800 mgd. As of 2022, on average 275 million gallons of wastewater enters the Hyperion Plant on a dry weather day (LASAN 2022).

3.20.1.3 Storm Water

The Proposed Project site is currently served by City of Beverly Hills storm drain facilities.

3.20.1.4 Solid Waste

The Beverly Hills Public Works Department, Solid Waste Division is responsible for solid waste collection in the City. The City contracts with Athens Environmental Services for waste hauling and collection services. Solid waste transported is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill.

3.20.2 Prior Environmental Review

3.20.2.1 Previous Environmental Analysis

The utilities/services systems impacts associated with the 2014 operational changes at the Virginia Robinson Gardens were evaluated in the following documents:

- *Draft Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (September 2012) – pages 127 through 134*
- *Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (May 2014)*

- *Recirculated Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (July 2014)*

3.20.2.2 Previously Identified Significant Project Impacts

The 2014 SEIR did not identify any significant project impacts on utilities.

3.20.2.3 Previously Identified Mitigation Measures

Impacts were found to be less than significant, and no mitigation was required.

3.20.3 Environmental Impacts

3.20.3.1 Water Service

The Gardens incorporates various features to reduce water demand on site. Water-wise, Mediterranean shrubs, grasses, and groundcovers complement the architectural theme and also reduce overall water use in the landscape. An automatic irrigation system with low volume equipment minimizes water loss due to run-off. Groundcovers and bark mulch help conserve water, lower the soil temperature, and reduce evapotranspiration. Water usage is also continuously monitored. The Proposed Project would comply with the Water Shortage Contingency Plan outlined in the Beverly Hills 2020 UWMP, if implemented. For example, limits may be applied to the number of days, frequency, and duration of outdoor watering.

Based on utility information provided by the County, for the 2018/2019, 2019/2020, and 2020/2021 fiscal years, water usage for both indoor and outdoor facilities at the Project Site averages 531,200 cubic feet per year (or an average of 0.0094 million gallons per day [mgd]) over the last three years (Yom 2022). 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 an average of sixteen staff and 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 an intermittent increase in visitors at the Project Site due to increased operational hours (average of three hours per day) and extended an additional day each week (open to the public seven days per week compared to six), increased maximum daily attendance to 200 visitors, and up to twenty additional Special Use Events annually. Additional visitors would cause an incremental increase in demand for water while at the Project Site primarily associated with restroom use. For daily use, visitors utilize restroom facilities on site, associated with the existing residence and Pool Pavilion. For special uses, visitors utilize restroom facilities on site and VIP portable facilities are arranged for the facility. As such, Special Use Events do not generate a substantial increase in water demand as much of the services are portable and brought to the Project Site (including water, electricity, and sewage provided by the VIP portable facilities). In any event, the Proposed Project would not result in the need for construction of new facilities at the Project Site or change the existing land uses. In addition, the Proposed Project would not induce substantial population growth in the Project Area. As such, the increase in water demand at the Project Site would conservatively be based on up to 800 additional visitors per week (up to

41,600 visitors annually) and 350 additional visitors per twenty additional special uses (up to 7,000 visitors annually). Based on this conservative estimate, the Proposed Project would increase water demand by approximately 171,072 gallons annually[1] (0.0005 mgd). The Gardens' water demand would be accommodated through the City's existing entitlements with MWD and would not require new or expanded water treatment facilities. Impacts related to water supply would be less than significant.

3.20.3.2 Sewer Service

Implementation of the Proposed Project would create a negligible increase in wastewater when compared to the available capacity of the Hyperion Treatment Plant. The Los Angeles Regional Water Quality Control Board (RWQCB) stipulates standards and regulations for utility service providers such as the Hyperion Plant. A substantial increase in wastewater diverted to the Hyperion Plant could conflict with pollutant standards and regulations of the Los Angeles RWQCB.

However, as discussed above, the Proposed Project would result in an increase in water annually of 28,160 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 188,179 gallons annually. Furthermore, for Special Use Events, visitors utilize restroom facilities on site and VIP portable facilities are arranged for large events. As such, special uses do not generate a substantial increase in wastewater discharge as much of the services are portable and brought to the Project Site (including water, electricity, and sewage provided by the VIP portable facilities).

As of 2022, on average 275 million gallons of wastewater enters the Hyperion Plant on a dry weather day, for a remaining capacity of 175 mgd (LASAN 2022). Therefore, the Hyperion 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.

3.20.3.3 Solid Waste

The City Public Works Department, Solid Waste Division contracts with Athens Services to provide waste collection service for all single-family residential areas and most multi-family residential buildings, including the Project Site. Solid waste from the City is sent to one of three landfills: Chiquita Canyon

[1]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. [41,600 visitors (annually for the additional operational day and increased hours) x 0.4 men x 1.6 gallons per flush] + [41,600 visitors (annually for the additional operational day and increased hours) x 0.6 (for women) x 3 flushes per day x 1.6 gallons per flush] + [7,000 visitors (annually for special use events) x 0.4 men x 1.6 gallons per flush] + [7,000 visitors (annually for special use events) x 0.6 women x 3 flushes per day x 1.6 gallons per flush].

Landfill, Sunshine Canyon Landfill, and the Calabasas Sanitary Landfill. These landfills are permitted to receive a combined 14,705 tons of waste per day (County of Los Angeles Public Works 2022).

The City of Beverly Hills currently achieves the State requirement to divert at least 50 percent of solid waste from landfills. The Gardens is required to comply with existing regulations regarding solid waste, recycling, and landfill diversion, which would reduce impacts to a level that is less than significant. The Project would be consistent with and would further City policies that reduce landfill waste streams. For example, the Gardens rigorously recycles organic waste in its composting program.

Based on the above, the landfills that serve the Project Site would have sufficient permitted capacity to accommodate the solid waste that would be generated by the proposed operational changes. Therefore, impacts would be less than significant, and no mitigation measures are required.

3.20.3.4 Storm Water

The Proposed Project would not result in any physical changes to the Project Site, including both structures and the gardens. As such, the Proposed Project would not alter existing stormwater flows from the Project Site and therefore would not result in additional stormwater flows that would require the construction of new or expanded stormwater facilities that could result in a significant impact. As such, the Proposed Project would result in a less than significant impact to stormwater facilities.

3.20.3.5 Energy Consumption

The amount of operational automotive fuel use associated with the proposed operational changes was estimated using the CARB's EMFAC2021 computer program, which provides projections for typical daily fuel usage in Los Angeles County (see Appendix D). Fuel consumption associated with the Proposed Project is summarized in Table 3.7-2 of Section 3.7 Energy of this SEIR.

The Proposed Project is estimated to generate an additional 100 daily trips (KOA 2022; Appendix F). As indicated in Table 3.7-2, this would result in the consumption of approximately 16,389 gallons of automotive fuel per year, which would increase the annual countywide automotive fuel consumption by 0.006 percent. This analysis conservatively assumes that all of the automobile trips projected to arrive at the Project during operations would be new to Los Angeles County. Fuel consumption associated with vehicle trips generated by the Project would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region. For these reasons, this impact would be less than significant.

The Project Site is currently, and has been since 1980, designated a house museum for public use that currently accommodates a myriad of events, such as children's programs, tours, photoshoots, and temporary exhibits and movie screenings. The Project would increase the number of Special Use Events occurring on the Project Site from 4 to 24 (up to 4 events per month) and increase the number of visitors per day from 100 to 200. The use of the Project Site will remain the same. As such, the Project will not conflict any plan for renewable energy or energy efficiency. No impact would occur.

3.20.4 Mitigation Measures

No significant impacts have been identified; therefore, no mitigation measures are required.

3.20.5 Residual Impacts After Mitigation

Project impacts would be less than significant.

3.21 Wildfire

3.21.1 Environmental Setting

Government Code 51175-89 directs the California Department of Forestry and Fire Protection (CALFIRE) to identify areas of very high fire hazard severity zones within Local Responsibility Areas. Mapping of the areas, referred to as Very High Fire Hazard Severity Zones (VHFHSZ), is based on data and models of potential fuels over a 30 to 50-year time horizon and their associated expected fire behavior, and expected burn probabilities to quantify the likelihood and nature of vegetation fire exposure to buildings. According to the CALFIRE Very High Fire Hazard Severity Zone Map, the Project Site is located within a VHFHSZ (CALFIRE 2022).

There has not been a wildland fire of any significance in Beverly Hills, and the last large wildland fire adjacent to the City occurred in Franklin Canyon more than 50 years ago. Nonetheless, wildland fires present a substantial hazard to life and property in areas of Beverly Hills that are built within or adjacent to hillsides and mountainous areas. Factors contributing to the risk of a wildland fire include heavy vegetation adjacent to homes and residential lot density. Approximately 1,628 parcels in Beverly Hills fall within the VHFHSZ (County of Los Angeles 2012).

3.21.2 Prior Environmental Review

3.21.2.1 Previous Environmental Analysis

Wildfire impacts associated with the 2014 operational changes at the Gardens were evaluated in the following documents:

- *Draft Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (September 2012) – page 81*
- *Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (May 2014)*
- *Recirculated Final Supplemental Environmental Impact Report Proposed Operational Changes to the Virginia Robinson Gardens (July 2014)*

3.21.2.2 Previously Identified Significant Project Impacts

The 2014 SEIR did not identify any significant project impacts to wildfire hazards associated with the previous operational changes at the Virginia Robinson Gardens.

3.21.2.3 Previously Identified Mitigation Measures

There were no mitigation measures identified in the 2014 SEIR because the impacts were found to be less than significant.

3.21.3 Thresholds of Significance

In November 2018, the California Natural Resources Agency amended the CEQA Guidelines to include wildfire impact analysis. Following Appendix G of the CEQA Guidelines, wildfire impacts are considered to be significant if the project would result in any of the following:

a) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:

   a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

   b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

   c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

   d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

3.21.4 Environmental Impacts

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. According to the Beverly Hills *Wildfire Hazard Area and Evacuation Routes Interactive Map*, the nearest evacuation route to the Project Site is Lexington Road, which serves as a secondary evacuation route, approximately 1,000 feet south of the Project Site (City of Beverly Hills 2022b). Lexington Road connects to Beverly Drive to the east and Benedict Canyon Drive to the west, which are both designated as primary evacuation routes. The Gardens' existing main entrance off of Elden Way would serve as the primary emergency ingress and egress, however pedestrian access to and from the Project Site is also available via Cove Way.

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 additional operational day) and annually (due to up to twenty additional Special Use 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 Project Site at any given time, as reservations would still be required for visitors. Special Use Events would require a traffic plan for each event, which would ensure that roadways would not be blocked for emergency access or evacuation. Therefore, the Proposed Project would have a less than significant impact due to the exposure of people to wildfire hazards.

3.21.5 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

3.21.6 Residual Impacts After Mitigation

Less than significant impacts would occur.

3.22 Summary

Implementation of the proposed operational changes would result in new significant traffic impacts. Based on the Project trip generation analysis, the net new daily vehicle trips would be 100. Based on traffic counts on Elden Way conducted for the 2014 SEIR environmental analysis, volumes on that roadway range from 150 to 275 vehicles each day. The Project addition of up to 100 additional vehicles each day on that roadway would cause increases in volumes that range from 38 percent to 57 percent. The City maximum impact threshold would be exceeded every day of the week.

Feasible physical improvements for the local roadway volume impact on Elden Way were not identified, nor were feasible project mitigation measures identified that would reduce the number of Project trips to a level where the local impact is not significant. The Proposed Project's impact to local roadways (Elden Way) would be significant and unavoidable.

4.0 ALTERNATIVES TO THE PROPOSED PROJECT

4.1 Introduction

In accordance with the requirements of CEQA, an evaluation of alternatives to the Proposed Project must be conducted. CEQA Guidelines Section 15126.6(a) states:

> An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.

The No Project Alternative is required by CEQA Guidelines. The Guidelines define the No Project Alternative as "the circumstance under which the project does not proceed" (Guidelines Section 15126.6(e)(3)(B)). The environmentally superior alternative is the alternative having the fewest significant environmental impacts from among the alternatives evaluated. The Guidelines state that if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

The whole of the record, especially with respect to CEQA, includes the 1980 EIR in combination with the 2014 SEIR and this SEIR. Accordingly, alternatives to the proposed project analyzed in the 1980 EIR were analyzed which propagates the record for the required Alternatives analysis. The analysis, findings, and mitigation measures of the 1980 EIR inherently (and by reference) provide the baseline for the 2014 and this analysis as the requirements of the 1980 EIR were included in an agreement between Los Angeles County and Friends of Virginia Robinson Gardens to create operational limitations of the Gardens. The Proposed Project is a minor modification to this agreement.

4.2 Alternatives Carried Forward for Analysis

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.

The Proposed Project was found to result in significant and unavoidable traffic impacts and no feasible mitigation measures were identified. The impact resulted from the daily increase in visitors and the exceedance of the local street threshold on Elden Way. The Reduced Daily Visitor Alternative, in addition to the No Project Alternative, are considered in this analysis to address the traffic impact on Elden Way.

4.2.1 Reduced Daily Visitor Alternative

4.2.1.1 Description

All of the operational features included in the Proposed Project would be part of the Reduced Daily Visitor Alternative except for the increase in daily visitors. This alternative allows for 140 visitors per day instead of 200 and would meet all of the Proposed Project objectives.

4.2.1.2 Impacts Analysis

The Reduced Daily Visitor Alternative would have less than significant impacts, with the exception of traffic impacts, similar to the Proposed Project. This Alternative would generate 40 new daily trips, including 20 vehicle trips during both the weekday a.m. peak hour and the p.m. peak hour. The addition of up to 40 additional vehicles each day on the roadway would cause increases in volumes that range from 15 percent to 23 percent. The City of Beverly Hills maximum impact threshold of 16 percent would be exceeded on four days of the week but not exceeded on Thursday and Friday, as summarized in the table below. Under this alternative, total VMT would be 2,380.

Table 4-1. Proposed Project Traffic Counts

	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
Existing Volume	180	170	210	210	150	175
Current VRG Project	50	50	50	50	50	0
Total with Current Project	**230**	**220**	**260**	**260**	**200**	**175**
Alternative 1	40	40	40	40	40	40
Percentage Increase	**17%**	**18%**	**15%**	**15%**	**20%**	**23%**

Notes: Daily vehicle trips provided by KOA (2022; Appendix F). The 2014 SEIR did not include Mondays as the Gardens were not open that day. The 2014 SEIR Proposed Project included expanding the days of operation from Monday to Saturday (2 additional days). Therefore, no data is available for comparison for Mondays. Existing operations data indicate that Mondays typically have fewer visitors than other days of the week, resulting in less traffic to the Project Site.

Impacts to air quality, greenhouse gases, and noise would decrease with the reduced number of daily vehicle trips. Impacts from the extended hours of operation, opening on Sundays, events/programming, commercial filming, and Special Use Events would be similar to the Proposed Project.

4.2.2 No Project Alternative

4.2.2.1 Description

CEQA requires that the No Project Alternative be analyzed in an EIR. In accordance with Section 15126.6(e)(3)(B), the No Project Alternative consist of an analysis of the circumstance under which the project does not proceed.

With the No Project Alternative, the Gardens would continue to be open from Monday to Saturday. The hours of operation would not be extended to sunset and the Gardens would not be open on Sundays. The number of allowed daily visitors would remain at 100 and would not be increased to 200. Events and programming would continue, however, family ceremonies such as weddings would not occur. Commercial filing activities would remain unchanged. Special Use Events would not be increased to up to 24 per year; they would stay at four. The Gardens would continue to promote the use of public transit and ridesharing such as Lyft/Uber. The No Project Alternative would not meet any of the Proposed Project objectives except for promoting alternative modes of transportation to the Gardens.

4.2.2.2 Impacts Analysis

The No Project Alternative would avoid the significant and unavoidable traffic impact on Elden Way on Sundays and weekdays as the days of operation under this alternative would remain Monday through Saturday and the proposed increase in daily visitors and Special Use Events would not occur. The 2014 SEIR found significant and unavoidable traffic impacts on Elden Way on Saturdays. As such, even with the No Project Alternative, this traffic impact remains significant and unavoidable. Impacts to air quality, greenhouse gas, noise, and public services would be less with the No Project Alternative because the proposed increase in daily visitors and Special Use Events would not occur.

4.3 Comparison of Alternatives

Table 4-2 provides a comparison of anticipated impacts of the alternatives with the Proposed Project. Table 4-3 provides a comparison of project objectives between alternatives and the Proposed Project.

Table 4-2. Comparison of Impacts for Alternatives with Proposed Project

Category	Reduced Daily Visitor Alternative	No Project
Aesthetics	O	O
Agriculture and Forestry Resources	O	O
Air Quality	–	–
Biological Resources	O	O
Cultural Resources	O	O
Energy	O	O
Geology/Soils	O	O
Greenhouse Gas Emissions	–	–
Hazards and Hazardous Materials	O	O
Hydrology/Water Quality	O	O
Land Use/Planning	O	O
Mineral Resources	O	O
Noise	–	–
Population/Housing	O	O
Public Services	O	–

Table 4-2. Comparison of Impacts for Alternatives with Proposed Project

Category	Reduced Daily Visitor Alternative	No Project
Recreation	O	O
Transportation	–	–
Tribal Cultural Resources	O	O
Utilities/Services Systems	O	O
Wildfire	O	O

Notes:
✚ = Impacts would be greater than the Proposed Project
O = Impacts would be similar to the Proposed Project
– = Impacts would be less than the Proposed Project

Table 4-3. Comparison of Project Objectives by Alternative

Project Objective	Proposed Project	Reduced Daily Visitor Alternative	No Project
Implement operational changes to fulfill the missions of the Virginia Robinson Gardens and the Los Angeles County Department of Parks and Recreation.	Y	Y	N
Increase the daily operating hours so that more visitors can be accommodated.	Y	Y	N
Increase the number of days per week that the project site is open to the public.	Y	Y	N
Increase visitor access each day for seminars and classes.	Y	Y	N
Allow for an increase in the number of special events at the Gardens to help with fundraising to support operations and programming of the Gardens.	Y	Y	N
Promote the use of alternative modes of transportation to the Gardens.	Y	Y	Y

Notes: Y = meets objective; N = does not meet objective

4.4 Environmentally Superior Alternative

CEQA Guidelines require that an EIR identify the environmentally superior alternative. The No Project Alternative would be the environmentally superior alternative because it would avoid all impacts associated with the Proposed Project. However, the No Project Alternative would not meet any of the project objectives (other than promoting alternative modes of transportation) or eliminate the previously identified significant unmitigable impact associated with Saturday traffic on Elden Way from the 2014 SEIR. According to the CEQA Guidelines, if the environmentally superior alternative is the No Project

Alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives. The Reduced Daily Visitor Alternative has been identified as the environmentally superior alternative because no other alternatives have been identified that would substantially reduce or eliminate significant adverse traffic impacts or would meet the project objectives when compared to the Proposed Project. In addition, the Reduced Daily Visitor Alternative would result in beneficial impacts to recreation and meet all of the project objectives.

5.0 OTHER CEQA CONSIDERATIONS

5.1 Cumulative Impacts

CEQA Guidelines Section 15355 defines cumulative impacts as "two or more individual effects that, when considered together, are considerable or that compound or increase other environmental impacts." In general, cumulative impacts occur in conjunction with other related developments whose impacts might compound or interrelate with those of the project under review.

In order to analyze the cumulative impacts of the Project in combination with existing development and other expected future growth, the amount and location of growth expected to occur (in addition to the Proposed Project) must be considered. As stated in CEQA Guidelines Section 15130(b), this reasonably foreseeable growth may be based on either of the following, or a combination thereof:

- A list of past, present, and reasonably anticipated future projects producing related or cumulative impacts, including those projects outside the control of the agency
- A summary of projections contained in an adopted general plan or related planning document which is designed to evaluate regional or area wide conditions

The Project Site is located in a fully developed area of the City of Beverly Hills. The Project Area is a stable, single-family residential area that is not undergoing, nor is it slated to undergo, substantial growth over the coming years. While demolition and replacement of estates (or construction on an existing estate) in this area of Beverly Hills is common, these practices do not substantially change the established residential nature of the area. The Proposed Project includes minor changes to the operational characteristics of the Project Site and would not substantially change or affect surrounding properties, nor would it conflict with other localized residential construction.

ECORP obtained a list of cumulative projects within one mile of the Project Site (City of Beverly Hills 2022a). The projects are listed below in Table 5.1-1 and Table 5.1-2.

Table 5.1-1. Beverly Hills Current Development Activity Projects List (Planning Commission/City Council) as of April 2022

Address	Project Description	Date Filed
814 North Alpine Drive	Central R-1 permit for a two-story accessory structure (guest house and carport) in the side and rear yard areas	9/21/2021
910 Alpine Drive	Hillside R-1 Permit to allow cumulative floor area in excess of 15,000 SF. New project scope also involves a request to deviate from wall height standards within the front yard and to allow the height of a wall to exceed the maximum height standards, and a request to remove protected trees.	8/19/2020
910 North Bedford	Historic Incentive Permit to allow waivers/deviations from certain development standards	

Table 5.1-1. Beverly Hills Current Development Activity Projects List (Planning Commission/City Council) as of April 2022

Address	Project Description	Date Filed
713 North Crescent Drive	Central R-1 Permit, ADU Use Permit Request for a Central R-1 Permit to construct a guest house encroaching within the allowable height envelope and an ADU Use Permit for a new accessory dwelling unit.	11/5/2021
1510 Lexington Road	Hillside R-1 for Export and View Preservation and Tree Removal Permit Request for two Hillside R-1 permits to allow floor area in excess of 15,000 square feet and to allow for a structure in excess of 14' in height that may disrupt the view of the LA Basin, as well as a Tree Removal Permit to remove protected trees in the front and street side yard areas.	9/15/2016
1193 Loma Linda Dr.	Hillside R-1 Permit – Export in excess of 1,500 cubic yards Request to allow export of over 1,500 cubic yards on a property immediately adjacent to a street that is less than 24' wide.	11/4/2016
1004 North Rexford Drive	Central R-1 Permit Request to allow accessory structures to be located within 100' of the front property line on an estate lot.	11/22/2021
1011 Roxbury Drive	Central R-1 Permit Request to construct a Guest House above detached garage and pool pavilion exceeding 14' in height within the side yard setback with multiple balcony decks.	6/16/2021
901 Whittier Drive	Game Court Location Request for a tennis court to be located within the required front yard.	11/24/2021

Table 5.1-2. Current Development Activity (Director Level) as of April 2022

Address	Project Description	Date Filed
1178 Loma Linda Drive	Lot Line Adjustment Request to adjust a portion of the rear lot line of 1178 Loma Linda to 1113 Sutton Way.	7/23/2021
1050 Summit Drive	Minor Accommodation Request for a Minor Accommodation to allow a 6'-0" fence to be located between 3' and 10' from the front property line.	3/29/2022
927 Whittier Drive	Minor Accommodation Request to allow a two-story accessory structure to be located within the required rear yard setbacks.	12/17/2021

Development in the area, as described in the tables above, is considered to be substantially stable and would be limited to infill or replacement projects that would not significantly alter land uses in the area. The Proposed Project would not result in new construction or alteration of existing structures at the Project Site. Further, the Proposed Project would not cause a substantial increase in traffic, nor would it induce substantial population growth. Both population-based and footprint-based impacts would be less than significant. Therefore, implementation of the Proposed Project would not be cumulatively considerable and cumulative impacts would be less than significant.

5.2 Growth-Inducing Impacts

According to Section 15126.2(e) of the CEQA Guidelines, growth-inducing impacts of a Project shall be discussed in the EIR. Growth-inducing impacts are those effects of the Project that might foster economic or population growth or the construction of new housing, either directly or indirectly, in the surrounding environment. Induced growth is any growth that exceeds planned growth and results from new development that would not have taken place without implementation of the project. For example, development of a project may require additional housing, goods, and services associated with the population increase caused by, or attracted to, the new project. Growth induced from a project may result in significant adverse impacts if the growth is not consistent with the land use plans and growth management plans and policies for the area affected. Thus, it is important to assess the degree to which the growth accommodated by a project would conflict with any applicable land use plan, policy, or regulation.

The environmental effects of induced growth are indirect impacts of a Project. Indirect effects of growth could result in significant, adverse environmental impacts, which could include increased demand on community or public services, increased traffic and noise, degradation of air and water quality, and conversion of agricultural land and open space to developed uses. Section 3.15 Population and Housing discusses the potential for unplanned population growth in the project area, either directly or indirectly. As described above, the Project Site is located in a fully developed area of the City of Beverly Hills. The Project Area is a stable, single-family residential area that is not undergoing, nor is it slated to undergo, substantial growth over the coming years. The Proposed Project includes changes to the operational characteristics of the Project Site and would not substantially change or affect surrounding properties, nor would it conflict with other localized residential construction. The Proposed Project would not employ substantial numbers of people. Therefore, the potential for unplanned growth would be less than significant.

5.3 Significant Irreversible Effects

Pursuant to Section 15126.2(d) of the CEQA Guidelines, an EIR must address any significant irreversible environmental change which would be caused by the Proposed Project should it be implemented. This discussion would typically include uses of nonrenewable resources during the initial and continued phases of a project that may be irreversible where a large commitment of such resources makes removal or nonuse thereafter unlikely. Examples cited include 1) primary impacts and secondary impacts (such as highway improvements that provide access to a previously inaccessible area), that generally commit future generations to similar uses; and 2) irreversible damage that could result from environmental accidents associated with a project.

The Proposed Project would expand operations of the Virginia Robinson Gardens by extending daily hours an average of 2.5 hours further into the evening, including Sunday operations in the typical weekly schedule, and offering up to 24 special use events per year. While consumption of energy supplies and non-renewable or slowly-renewable resources would occur with Project implementation, the Project Site

has been historically in use with recreational opportunities and Special Use Events. The Project's utility impacts are determined to be less than significant.

Pursuant to Section 15127 of the CEQA Guidelines: Limitations on Discussion of Environmental Impact, the information required by Section 15126.2(d) concerning irreversible changes need be included in EIRs prepared only in connection with any of the following activities:

- The adoption, amendment, or enactment of a plan, policy or ordinance of a public agency;
- The adoption by a Local Agency Formation Commission of a resolution making determinations; or
- A project which will be subject to the requirement for preparing an environment impact statement pursuant to the requirements of the National Environmental Policy Act if 1969, 42 U.S.C 4321-4347.

In the instance of the Proposed Project, none of the foregoing activities apply. In particular, and as discussed previously, the Project is consistent with the existing General Plan and zoning, and does not require adoption, amendment, or enactment of any plan, policy or ordinance of the City of Beverly Hills or County of Los Angeles. Therefore, no further discussion of this topic in this SEIR is required.

5.4 Unavoidable Significant Adverse Effects

Implementation of the proposed operational changes would result in new significant traffic impacts. Based on the Project trip generation analysis, the net new daily vehicle trips would be 100. Based on traffic counts on Elden Way conducted for the 2014 SEIR environmental analysis, volumes on that roadway range from 150 to 275 vehicles each day. The current Project operations add 50 vehicles per day to the same segment, based on 100 daily visitors, an assumption of two persons per vehicle, and one inbound trip and one outbound trip. The Project addition of up to 100 additional trips each day on that roadway would cause increases in volumes that range from 38 percent to 57 percent. The City maximum impact threshold would be exceeded every day of the week.

Feasible physical improvements for the local roadway volume impact on Elden Way were not identified, nor were feasible Project mitigation measures identified that would reduce the number of Project trips to a level where the local impact is not significant. The Proposed Project's impact to Elden Way would be significant and unavoidable.

6.0 AGENCIES AND PERSONS CONSULTED

6.1 Los Angeles County Department of Parks and Recreation

Diane Bischetti Sipos, Superintendent of the Virginia Robinson Gardens

Clement Lau, AICP, Departmental Facilities Planner

Timothy Lindsay, Superintendent of the Virginia Robinson Gardens (former)

Hugo Maldonado, Regional Operations Manager

Jill Sourial, Deputy Director, Planning and Development Agency

Sean Woods, Chief of Planning

Julie Yom, AICP, Park Planner

6.2 City of Beverly Hills

Kevin Riley, T.E., Senio

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9.0 ACRONYMS AND ABBREVIATIONS

Term	Description
AB	Assembly Bill
ADT	Average Daily Trips
APN	Assessor's Parcel Numbers
AQMP	Air Quality Management Plan
BHFD	Beverly Hills Fire Department
BHPD	Beverly Hills Police Department
BHUSD	Beverly Hills Unified School District
BMP	Best Management Practice
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CalOSHA	California Occupational Safety and Health Administration
CALFIRE	California Department of Fire and Forestry Resources
CARB	California Air Resources Board
CCR	California Code of Regulations
CDFG	California Department of Fish and Game
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CNEL	Community Noise Equivalent Level
CO	Carbon Monoxide
CO_2e	Carbon Monoxide Equivalent
CRHR	California Register of Historical Resources
dB	decibel
dBA	decibel A-weighted
DPR	Los Angeles County Department of Parks and Recreation
EIR	Environmental Impact Report
EOP	Emergency Operations Plan
FHWA	Federal Highway Administration
FTA	Federal Transit Authority
FTBMI	Fernandeño Tataviam Band of Mission Indians
GHG	Greenhouse Gas
HCM	Highway Capacity Manual
HMAP	Hazard Mitigation Action Plan
kV	Kilovolt
kwh	Kilowatt hours
LASAN	Los Angeles Sanitation Districts
LOS	Level of Service
LST	localized significance threshold
MMRP	Mitigation, Monitoring, and Reporting Program
MLD	most likely descendants
MRZ	Mineral Resource Zone
MW	Megawatts
MWD	Metropolitan Water District
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NO_2	Nitrogen Dioxide

Term	Description
NOP	Notice of Preparation
NOx	Nitrogen Oxides
NRHP	National Register of Historic Places
NPDES	National Pollutant Discharge Elimination System
OES	Office of Emergency Services
PEIR	Program Environmental Impact Report
PM_{10}	Fine Particulate Matter Equal to or Less Than 10 Microns in Size
$PM_{2.5}$	Fine Particulate Matter Equal to or Less Than 2.5 Microns in Size
ppm	parts per million
PPV	Peak particle velocity
PV	Photovoltaic
RMS	Root mean square
ROG	Reactive Organic Gases
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SCAQMD	South Coast Air Quality Management District
SEIR	Supplemental Environmental Impact Report
SR	State Route
SO_2	Sulfur Dioxide
STC	Sound Transmission Class
SWPPP	Storm Water Pollution Prevention Plan
TCR	Tribal Cultural Resource
USEPA	United State Environmental Protection Agency
UST	underground storage tank
UWMP	Urban Water Management Plan
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled



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