

III. Revisions, Clarifications, and Corrections to the Draft EIR

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This section of the Final EIR provides changes to the Draft EIR that have been made to revise, clarify, or correct the environmental impact analysis for the 8th, Grand and Hope Project (Project). Such changes are a result of public and agency comments received in response to the Draft EIR. The changes described in this section do not result in the Project creating any new or increased significant environmental impacts.

This section is divided into two parts: Section III.A, Corrections and Additions to Draft EIR Sections and Appendices, and Section III.B, Effect of Corrections and Revisions.

A. Corrections and Additions to Draft EIR Sections and Technical Appendices

Section I. Executive Summary

Page I-20, add the following footnote to Table I-2:

- ^a *In addition to these impact conclusions set forth in the impact analysis sections of the Draft EIR, the Initial Study for the Project also determined that potential impacts associated with archaeological and paleontological resources would be less than significant with implementation of mitigation measures. Refer to Appendix A of the Draft EIR.*

Section II. Project Description

Page II-15, replace Figure II-8 with Revised Figure II-8 shown on page III-2.



Figure II-8
 Conceptual Site Plan

Source: Gensler, 2020.

Section IV.G Transportation

Page IV.G-23, revise Project Design Feature TR-PDF-1 as follows:

Project Design Feature TR-PDF-1: A detailed Construction Management Plan and Worksite Traffic Control Plan will be prepared and submitted to the City for review and approval prior to the issuance of any demolition, construction or building permits. These plans will include sidewalk/lane closure information, a detour plan, haul routes, and a staging plan to formalize how construction would be carried out and to identify specific actions that would be required to reduce effects on the surrounding community. The plans will also identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activities. The plan details will be coordinated with emergency services and affected transit providers that may need to temporarily close or relocate bus stops. Specifically, the Applicant will coordinate with Metro's Bus Operations Control Special Events Coordinator and Metro's Stops and Zones Department no later than 30 days before the start of Project demolition or construction. The plans will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site.

Page IV.G-23, add Project Design Feature TR-PDF-2 as follows:

Project Design Feature TR-PDF-2: Any new signage within the Project Site referencing Metro shall be reviewed and approved by Metro prior to display of the signage.

Section IV.H Tribal Cultural Resources

Page IV.H-8, revise the last paragraph as follows:

The City received a response from Michael Mirelez on behalf of the Torres Martinez Desert Cahuilla Indians. In his response letter dated June 6, 2019, Mr. Mirelez stated that the Torres Martinez Desert Cahuilla Indians Tribe defers all future Project notifications to tribes in closer proximity to the Project Site. The City also received a response from Andrew Salas, Tribal Chairman of the Gabrieleño Band of Mission Indians—Kizh Nation requesting

consultation. Consultation with Gabrieleño Band of Mission Indians—Kizh Nation ~~is ongoing~~ concluded on September 15, 2022. To date, no other responses or requests for further consultation have been received from the tribal contacts regarding tribal cultural reports or other concerns about the Project. A record of the letters, mailings, and correspondence, excluding that deemed confidential, is included as Appendix H of this Draft EIR.

Page IV.H-15, revise the first partial paragraph as follows:

considerable development from the late nineteenth to early twentieth century. To determine the subsurface conditions within the Project Site, the geotechnical report, *Preliminary Geotechnical Engineering Investigation, Proposed Mixed-Use Development, 754 S. Hope Street and 609–625 W. 8th Street, Los Angeles, California* prepared by Geotechnologies, Inc. on November 8, 2018 for the Project Site was reviewed.¹⁰ According to the geotechnical report, the subsurface exploratory borings encountered fill soils or disturbed soils underlying the Project Site from surface to between three and six feet below the existing ground surface at all five boring locations. Fill soils encountered are described as silty sands and sandy silts, which are dark brown in color, slightly moist to moist, medium dense to dense, and medium firm to stiff, fine grained, and locally with abundant brick and concrete fragments and is underlain by native alluvial soils that were deposited by river and stream activities. Based on the subsurface conditions, the Project Site has been subjected to consistent and considerable ground disturbance and therefore, subsurface contexts within the Project Site are of low suitability to support the presence of intact tribal cultural resources (generally less than 10 feet below the surface in this area). ~~As discussed above, consultation with the Gabrieleño Band of Mission Indians—Kizh Nations is still ongoing. This consultation will be further documented as part of the Final EIR. The tribal consultation process between the Department of City Planning staff and the Gabrieleño Band of Mission Indians—Kizh Nation commenced on December 16, 2021 with a conference call. During the call, City staff provided general information regarding the physical aspects of the Project and the Project Site. The Gabrieleño Band of Mission Indians—Kizh Nation discussed the history of the region within which the Project Site is located, stated that multiple trade routes existed in the surrounding area, stated that a village was located near the Project Site, and provided information that they characterized as confidential. In summary, the Gabrieleño Band of Mission Indians—Kizh Nation stated that the Project Site is located within the boundaries of Kizh ancestral territory, and that excavation that reaches native soil has the potential to impact tribal cultural resources. On December 23, 2021, the Gabrieleño Band of Mission Indians—Kizh Nation provided the City additional~~

information (e.g., pages from historic books and maps, screenshots of text, and explanatory text) related to Tribal settlements and villages occupying areas with the City of Los Angeles. The Gabrieleño Band of Mission Indians—Kizh Nation also stated that there is potential for environmental impacts to tribal cultural resources and requested mitigation measures to be implemented to reduce potential impacts.

With the understanding that the submitted ancestral territory includes the general downtown Los Angeles area, on March 24, 2022, City staff forwarded a Pre-closure consultation letter to the Gabrieleño Band of Mission Indians—Kizh Nation, and asked if there was any additional material that would serve to more specifically identify the potential for on-site tribal cultural resources specific to the Project’s development area. The Gabrieleño Band of Mission Indians—Kizh Nation requested continuance of AB 52 consultation, which resulted in a second consultation call on May 17, 2022. During the consultation, City staff noted that while the additional documentation provided on December 23, 2021 identified general locations of villages and trade routes, the documents did not demonstrate evidence of a TCR located specifically within or adjacent to the Project site. During the consultation, the Gabrieleño Band of Mission Indians—Kizh Nation forwarded via email three additional maps including a map indicating that a rail line was located approximately 700 feet southeast from the Project Site, a map with two proximate locations of the historic Zanja Madre aqueduct, and an overlay map generally identifying trade routes within the vicinity of the Project Site. The Gabrieleño Band of Mission Indians—Kizh Nation concluded that due to known villages that overlapped each other, the higher potential for isolated burial sites to be located in proximity to trade routes, and because of the higher amount of human activity near watercourses within the area, that there is potential for tribal cultural resources or artifacts and human remains to be discovered within the area.

In consideration of the previously disturbed on-site soil with the Project Site, the two-mile distance from the Project Site to historic and prehistoric villages and watercourses, and the generality of the alleged trade route locations, as well as a review of the additional maps and documentation provided by the Gabrieleño Band of Mission Indians—Kizh Nation, exercising its discretion, the City has concluded that there is not substantial evidence of the presence of a specific tribal cultural resource within the Project site or in its vicinity. As such, based upon the record, the City has determined that no substantial evidence exists to support a conclusion that the Project may cause a significant impact on tribal cultural resources. Therefore, the City has no basis under CEQA to impose any related mitigation measures. However,

as discussed further below, as an additional protection, the City will implement the City’s standard condition of approval under its police powers to protect the inadvertent discovery of tribal cultural resources. The Condition of Approval incorporates elements of the requested measures proposed by the Gabrieleño Band of Mission Indians—Kizh Nation, including specific notification requirements in the event of inadvertent discovery. In addition, the Condition of Approval would not provide less protection of any finds in the event of inadvertent discovery of a prospective resource.

~~Based~~In summary, based on the TCR Report and the whole of the record there is no substantial evidence that the Project would result in significant impacts to tribal cultural resources. **As such, the City, in its discretion and supported by substantial evidence, finds that the Project Site does not contain any resources determined to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. Accordingly, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource. As such, Project impacts related to tribal cultural resources would be less than significant.**

Section IV.I.2 Utilities and Service Systems—Energy Infrastructure

Page IV.I.2-12, last paragraph, delete “transportation energy” from the first sentence. (Transportation energy is addressed in Section IV.B, Energy, of the Draft EIR.)

Appendix D: Land Use Tables

Table 6, Pages 34 through 43, change the Table Heading to “Applicable Standards and Guidelines of the Downtown Design Guide” consistent with the table heading on page 33.

Appendix G: Transportation Assessment

Page 20, replace Table 1.2 with Revised Table 1.2 on page III-7, which reflects the new bus service frequencies in the NextGen Bus Plan.

**Revised Table 1.2
Transit Service Characteristics**

Route	Description	Approximate Headway (minutes)	
		A.M. Peak	P.M. Peak
Metro Rail Lines			
Blue Line	Long Beach Transit Mall–7th Street/Metro Center	10	10
Red/Purple Line	Downtown Los Angeles–North Hollywood	15	15
Expo Line	Downtown Los Angeles–Santa Monica	10	10
Silver Line	San Pedro–El Monte	15	15
Metro Express Bus Line			
460	Downtown Los Angeles–Anaheim	30–40	30–40
487/489	Downtown Los Angeles–El Monte	40	40
Metro Rapid			
760	Lynwood–Downtown Los Angeles	5	15–30
770	Los Angeles–El Monte	20	20
Metro Local			
20	Santa Monica–Los Angeles	15	15
37	Los Angeles–Downtown Los Angeles	10–15	10–15
51/52/352	Compton–Wilshire Center	6	6
60	Compton–Downtown Los Angeles	6–8	6–8
66	Downtown Los Angeles–Montebello	8–10	8–10
70	Los Angeles–El Monte	10	10
71	Los Angeles–Cal State LA Station	15–30	15–30
76	Downtown Los Angeles–El Monte	20	20
78/79/378	Downtown Los Angeles–Arcadia	12	12
81	Downtown Los Angeles–Eagle Rock	15–20	15–20
96	Downtown Los Angeles–Burbank	45	45
LADOT—DASH			
Dash B	Chinatown–Financial District	8	8
Dash E	City West–Fashion District	5	5
Dash F	Fashion District–Exposition Park, USC	10	10
Orange County Transportation Authority			
OC 701	Huntington Beach–Los Angeles	60	60
OC 721	Fullerton–Los Angeles	60	60
Foothill Transit			
FT 493	Downtown Los Angeles–Diamond Bar	12	12
FT 495	Downtown Los Angeles–Industry Park & Ride	30	20
FT 496	Downtown Los Angeles–Azusa, West Covina	30	30

**Revised Table 1.2 (Continued)
Transit Service Characteristics**

Route	Description	Approximate Headway (minutes)	
		A.M. Peak	P.M. Peak
FT 497	Downtown Los Angeles–Chino Park & Ride, Industry Park & Ride	15	12
FT 498	Downtown Los Angeles–Azusa, West Covina	10	8
FT 499	Downtown Los Angeles–San Dimas Park & Ride	12	15
FT 699	Downtown Los Angeles–Montclair, Fairplex Park & Ride	N/A	9
FT SS	Silver Streak–Montclair to Los Angeles	15	15
Commuter Express			
CE 409	Downtown Los Angeles–Foothill & Glendale	20	15
CE 419	Downtown Los Angeles–Chatsworth	20	20
CE 431	Downtown Los Angeles–Westwood	30	30
CE 437	Downtown Los Angeles–Culver City	30	30
CE 438	Downtown Los Angeles–Redondo Beach	12	10
CE 448	Downtown Los Angeles–Rancho Palos Verdes	30	30
CE 534	Downtown Los Angeles–West Los Angeles	60	30
Big Blue Bus			
R10	Downtown Santa Monica to Downtown Los Angeles	20	20
Santa Clarita Transit			
799	Santa Clarita to Downtown Los Angeles	24	40
<p>N/A = Not Applicable Source: The Mobility Group, 2022.</p>			

B. Effect of Corrections and Revisions

CEQA Guidelines Section 15088.5 requires that an EIR which has been made available for public review, but not yet certified, be recirculated whenever significant new information has been added to the EIR. The entire document need not be circulated if revisions are limited to specific portions of the document.

The relevant portions of CEQA Guidelines Section 15088.5 read as follows:

- (a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term

“information” can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation include, for example, a disclosure showing that:

- (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.*
 - (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.*
 - (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project’s proponents decline to adopt it.*
 - (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (Mountain Lion Coalition v. Fish and Game Com. (1989) 214 Cal.App.3d 1043)*
- (b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.*

The information contained in this section clarifies, amplifies, or refines information in the Draft EIR but does not make any changes that would meet the definition of “significant new information” as defined above. The information added to the Draft EIR does not change the Draft EIR in a way that deprives the public of a meaningful opportunity to comment upon a new or substantially increased significant environmental effect of the Project or disclose a feasible alternative or mitigation measure the Applicant has declined to adopt. The revisions, clarifications, and corrections to the Draft EIR would not result in new significant impacts or increase any impact already identified in the Draft EIR. Thus, none of the conditions in Section 15088.5 of the CEQA Guidelines are met and recirculation of the Draft EIR is not required.