

**FINAL ENVIRONMENTAL IMPACT REPORT
ALTADENA MAIN LIBRARY RENOVATION PROJECT
ALTADENA, CALIFORNIA**

State Clearinghouse No. 2024120781

Prepared for:

**LOS ANGELES COUNTY DEPARTMENT OF REGIONAL PLANNING
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Los Angeles, CA 90012**

Project Applicant:

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Prepared by:



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TABLE OF CONTENTS

	<u>Page</u>
EXECUTIVE SUMMARY	1
SECTION 1.0 – PROJECT OVERVIEW	1
1.1 INTRODUCTION.....	ERROR! BOOKMARK NOT DEFINED.
1.2 PROJECT SUMMARY	1
1.3 PROJECT DESCRIPTION SUMMARY	1
1.4 ADEQUACY OF THE FINAL FEIR	2
1.5 COMMENTS ON THE DRAFT EIR	2
1.6 LIST OF COMMENTERS	2
SECTION 2.0 – RESPONSES TO COMMENTS	3
2.1 INDIVIDUAL COMMENTS	3
SECTION 3.0 – DRAFT EIR REVISIONS.....	18
SECTION 4.0 – REPORT PREPARATION.....	27
SECTION 5.0 – ACRONYMS AND ABBREVIATIONS.....	28
APPENDIX A – DRAFT ENVIRONMENTAL IMPACT REPORT	
APPENDIX B – MITIGATION MONITORING AND REPORTING PROGRAM	
APPENDIX C – FINDINGS OF FACT AND STATEMENT OF OVERRIDING CONSIDERATIONS	

LIST OF TABLES

	<u>Page</u>
Table ES-1: Summary of Significant Impacts and Mitigation Measures.....	ES-4
Table ES-2: Summary of Project Design Features	ES-10

EXECUTIVE SUMMARY

E.S.1 INTRODUCTION

The Altadena Library District (District) requests discretionary permits (i.e., a conditional use permit and an oak tree permit) from Los Angeles County (County) for the proposed renovation, seismically retrofit, access improvement, and expansion of the existing Altadena Main Library. The District is a small public agency that is considered a California Special District. The District is proposing to renovate, seismically retrofit, improve access, and expand the Altadena Main Library (Project or Proposed Project).

The objective of the renovation is to maximize use of the library space, improve user experience, improve seismic resilience, replace aging infrastructure, and activate outdoor space to increase visibility and engagement.

E.S.2 PURPOSE OF THE ENVIRONMENTAL IMPACT REPORT

The primary purpose of the CEQA process is to inform the public and decision-makers as to the potential impacts of a project and to allow an opportunity for public input to ensure informed decision-making by the Lead Agency. CEQA requires all State and local government agencies to consider the environmental effects of projects over which they have discretionary authority. CEQA also requires each public agency to mitigate or avoid the significant environmental impacts resulting from proposed projects, when feasible, and to identify a range of feasible alternatives to the proposed project that could reduce those environmental effects.

Under CEQA, an EIR analyzes the impacts of an individual activity or specific project and focuses primarily on changes in the environment that would result from that activity or project. The EIR must include the contents required by CEQA and the CEQA Guidelines and examine all phases of the project, including planning, construction, operation, and any reasonably foreseeable future phases.

This Final Environmental Impact Report (Final EIR) has been prepared in accordance with the requirements of the CEQA Guidelines in Section 15132 which states that the Final EIR must contain:

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

The response and evaluation to public comments is an important part of the CEQA process as it allows the opportunity to review and comment on the methods of analysis in the Draft EIR, the ability to detect omissions which may have occurred during the preparation of the Draft EIR, the ability to review of accuracy of the analysis in the Draft EIR, to share expertise, and identify public concerns.

E.S.3 Organization of the Final EIR

The Final EIR incorporates the Draft EIR and Technical Appendices to the Draft EIR, and a response to the comment letters received in response to the Draft EIR. The Final EIR is comprised by the following sections:

Chapter 1 Project Overview: This section provides an introduction and summary of the Proposed Project and list of commenters for the Draft EIR.

Chapter 2 Response to Comments: This section contains a copy of the actual comments submitted during the public review period and provides response to each comment which is broken down by topic or paragraph.

Chapter 3 Draft EIR Revisions: This section includes a summary of the changes made to the Draft EIR.

Chapter 4 Report Preparation: This section includes all entities involved in the preparation of the Draft EIR and Final EIR.

Chapter 5 Acronyms and Abbreviations: This section summarizes all acronyms and abbreviations used in the Final EIR.

E.S.4 PROJECT BACKGROUND

The Main Library (“Main”) was designed by Boyd Georgi in 1967, with the landscape designed by Eriksson Peters & Thoms, Landscape Architects. Since its construction, minor alterations have occurred, including replacement of entrance doors at the exterior, and the addition of a lower-level storage area and replacement of carpet and finishes on the interior. However, most of its original landscape and building materials (mature trees and concrete planters, concrete block and stucco walls, fixed metal windows, steel-framed bridge with wood decking, hexagonal tile at the entry and reading court) remain. The existing parking lot has 50 spaces, two of which are handicapped accessible.

E.S.5 PROJECT DESCRIPTION

Project Components

Project features include the following:

- New Entry/Lobby
- New Deck
- New Outdoor Reading Court
- New Delivery Loading Zone
- New Staff Delivery Area
- New Entry Wall and Signage
- New Access Ramp
- New Stairs
- Re-surfaced and Re-stripped Parking lot
- Refurbishment of Existing Footbridges

Construction

The Project is planned to occur in a single phase and be completed within 14 to 18 months. The planned improvements at the Main include an expansion of the building footprint by approximately 700 square feet, interior space reconfigurations, access improvements, seismic retrofit, and replacement of aged building infrastructure to address mechanical (elevator and heating, ventilation, and air conditioning

[HVAC]), plumbing (including additional and accessible restrooms), and electrical and structural elements of the facility. Infrastructure improvements are expected to include some modernized Audio Visual (AV) spaces with newer technology, updated communications infrastructure, and structured cabling. Upgrades to plantings and irrigation, along with adding outdoor functional spaces are also planned.

Demolition

Some demolition and grading are required to complete the Main renovation and expansion. The site is approximately 1.72 acres, with 0.28 acres being disturbed for improvements. Demolition includes removal of concrete, pavement, and existing turf, planters, and shrubs. Grading is designed to slope walking paths, landscapes, and other surfaces away from buildings toward on-site drainage features. Areas of pavement and concrete removal include the area for the new entry/lobby along the south side of the Main and walkways leading to the bridge on the north side of the facility. Clearing and grubbing would occur at the new outdoor reading court, the new entry/lobby, near the path to the bridge on the north side, and the new Community Room Deck. In the interior, there would be some demolition of non-structural walls, doors, and stairways.

Operations

Operations would be similar to existing conditions.

E.S.6 TABLE OF SIGNIFICANT IMPACTS AND MITIGATION MEASURES

Table ES-1 on the following pages summarizes potential significant adverse impacts of the Proposed Project. Each resource area is summarized in Chapter 3.0. Impacts found to be significant are listed with proposed mitigation measures. The resulting impact after each mitigation is indicated, and cumulative impacts, if any, will be identified as required under CEQA. Table ES-2 on the following pages summarize components incorporated into the Proposed Project.

Table ES-1: Summary of Significant Impacts and Mitigation Measures

Significance Threshold	Project Related Impact	Level of Significance before Mitigation	Mitigation	Level of Significance After Mitigation
Biological Resources				
Would the project conflict with any local policies or ordinance protecting biological resources, such as a tree preservation policy or ordinance?	Tree removal and encroachment	Potentially Significant Impact	<p>BIO-1: Tree Survey, Protection, and Maintenance. Prior to the issuance of any building permits, the Altadena Library District shall retain a certified arborist to conduct a tree survey and complete a report identifying all trees proposed for removal. The report shall include, at a minimum, the species, size (diameter at breast height), health condition, and location of each tree. The Tree Survey and Report shall be submitted to the County for review and approval to determine applicable tree replacement requirements in accordance with County ordinances. The Altadena Library District shall implement all required replacement measures as determined by the County. Any new or replacement oak trees shall consist of native oak species to avoid hybridization with non-native oak species.</p> <p>Any pruning of oak trees shall be conducted in accordance with County Code Chapter 22.174, which states maintenance shall be limited to medium pruning of branches not exceeding two (2) inches in diameter, unless otherwise approved by the County, and shall be conducted in accordance with the guidelines of the International Society of Arboriculture to ensure the continued health of protected trees. The protection, maintenance, and care of all oak trees, regardless of size, shall be conducted in accordance with: (1) the recommendations of the certified arborist or County Forester; (2) applicable County guidance</p>	Less than Significant

Significance Threshold	Project Related Impact	Level of Significance before Mitigation	Mitigation	Level of Significance After Mitigation
			documents, including the Oak Trees: Care and Maintenance Guide; and (3) the oak tree reports prepared for Oak Tree Permit No. RPPL2025003986. All such measures shall be implemented throughout construction and for any post-construction maintenance period required by the County.	
Cultural Resources				
Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	Renovating the Altadena Main Library	Potentially Significant Impact	<p>CUL-1: Historic American Buildings Survey-like Documentation. Prior to commencement of demolition, the building should be recorded through a documentation report based on Historic American Buildings Survey (HABS) standards. The report will be completed by an architectural historian or historic architect who meets the Secretary of the Interior’s Professional Qualification Standards and will be based on the National Park Service (NPS) HABS Level III format and content requirements. An archival copy of the HABS report will be filed with the Altadena Library and non-archival copies may be deposited in the collections of the Long Beach Public Library and Long Beach Heritage Museum, if requested, and in the California Historical Resources Information System (CHRIS) South Central Coastal Information Center (SCCIC).</p> <p>CUL-2: Salvage and Use of Salvaged Materials. Prior to the commencement of demolition, the County should coordinate with an architectural historian or historic architect who meets the Secretary of the Interior’s Professional Qualification Standards, the Project architect, and the demolition contractor to develop a list of materials</p>	Significant and Unavoidable

Significance Threshold	Project Related Impact	Level of Significance before Mitigation	Mitigation	Level of Significance After Mitigation
			that would be salvaged during demolition and a salvage plan which may include architectural history monitoring during demolition.	
Tribal Cultural Resources				
	Renovating the Altadena Main Library	Potentially Significant Impact	<p>TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities.</p> <p>A. The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any “ground-disturbing activity” for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). “Ground-disturbing activity” shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.</p> <p>B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.</p>	Less than Significant

Significance Threshold	Project Related Impact	Level of Significance before Mitigation	Mitigation	Level of Significance After Mitigation
			<p>C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or “TCR”), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.</p> <p>D. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.</p>	

Significance Threshold	Project Related Impact	Level of Significance before Mitigation	Mitigation	Level of Significance After Mitigation
			<p>TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial).</p> <p>Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe’s sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.</p> <p>TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects.</p> <p>A. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.</p> <p>B. If Native American human remains and/or grave goods are discovered or recognized on the project</p>	

Significance Threshold	Project Related Impact	Level of Significance before Mitigation	Mitigation	Level of Significance After Mitigation
			<p>site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed.</p> <p>C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).</p> <p>D. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.</p> <p>E. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.</p>	

Table ES-2: Summary of Project Design Features

Project Design Feature (PDF)	Description
PDF-1	If Project clearing and construction must occur during the avian nesting season (February to September), a survey for active nests must be conducted by a qualified biologist no more than 2 weeks prior to the activities to determine the presence/absence, location, and status of any active nests on or adjacent to the Project site. If no active nests are discovered or identified, no further mitigation is required. In the event that active nests are discovered on-site, a suitable buffer determined by the qualified biologist (e.g., 30 to 50 feet for passerines) will be established around such active nests. No ground-disturbing activities will occur within this buffer until the biologist has confirmed that breeding/nesting is completed, and the young have fledged the nest. Limits of construction to avoid a nest site will be established in the field by a qualified biologist with flagging and stakes or construction fencing. Construction personnel will be instructed regarding the ecological sensitivity of the fenced area. The results of the survey will be documented and filed with the County within five days after the survey.
PDF-2	The Project will implement Low Impact Development (LID) standards, as required by Section 12.84.440 of County Code, that would result in a net reduction in impervious surface on the site compared to existing conditions.

ES.7 PROJECT ALTERNATIVES

The following alternatives for the Draft EIR were identified and evaluated:

- No Project Alternative – no changes in existing conditions.
- ARG¹ Alternative

The following alternatives were considered but ultimately rejected for study in the Draft EIR:

- Americans with Disabilities Act (ADA) Only Alternative
- CWA² Alternative

Chapter 4.0 of the Draft EIR discusses these alternatives and includes an analysis of potential environmental impacts associated with each.

¹ ARG (Architectural Resources Group) a private architectural firm who was commissioned by the Altadena Library District to complete a historical resources assessment of the Altadena Main Library.

² CWA is a private architectural firm who was commissioned by Altadena Library District to provide a Renovation and Expansion design for Altadena Main Library.

SECTION 1.0 – PROJECT OVERVIEW

1.1 PROJECT SUMMARY

The Final Environmental Impact Report for the proposed Altadena Main Library Renovation Project (Proposed Project) has been prepared for the Altadena Library District (District), in accordance with the California Environmental Quality Act (CEQA) Guidelines §15086: Consultation Concerning the Draft EIR, §15088: Evaluation of and Response to Comments, and §15132: Contents of Final Environmental Impact Report. This Final FEIR consists of the following information:

- a. The Draft EIR, which was circulated for a 45-day public comment period beginning September 25, 2025 and ending November 20, 2025; and
- b. A list of all commenters during the public comment period, including copies of written comment letters; and
- c. Responses to all comments;
- d. Revisions to the Draft EIR.

As discussed in Section 3.0, no revisions to the text, analysis, findings, or conclusions of the Draft EIR are required, and the Draft EIR remains unchanged. The Draft EIR, and Final EIR, and administrative record are available for review upon request at:

- Altadena Main Library at 600 E. Mariposa Street, Altadena, CA 921001

1.2 PROJECT DESCRIPTION SUMMARY

The planned improvements at the Main include an expansion of the building footprint by approximately 700 square feet, interior space reconfigurations, access improvements, seismic retrofit, and replacement of aged building infrastructure to address mechanical (elevator and heating, ventilation, and air conditioning [HVAC]), plumbing (including additional and accessible restrooms), and electrical and structural elements of the facility. Infrastructure improvements are expected to include some modernized Audio Visual (AV) spaces with newer technology, updated communications infrastructure, and structured cabling. Upgrades to plantings and irrigation and adding outdoor functional spaces are also planned. Project features include the following:

- New Entry/Lobby
- New Deck
- New Outdoor Reading Court
- New Staff Delivery Area
- New Loading Zone
- New Entry Wall and Signage
- New Access Ramp
- New Stairs
- Parking lot Re-surfaced and Striped
- Refurbishment of Existing Footbridges

Refer to Chapter 2 of the Revised Draft EIR for a complete description of the project.

1.3 ADEQUACY OF THE FINAL FEIR

Under CEQA, the responses to comments on a Draft EIR must include good faith, well-reasoned responses to all comments received on the Draft EIR that raise significant environmental issues related to the project under review. If a comment does not relate to the Draft EIR or does not raise a significant environmental issue related to the project, there is no need for a response under CEQA.

CEQA does not require the EIR authors to conduct every test or perform all research or study suggested by commenters in responding to comments. The EIR need only to respond to significant environmental issues and need not provide all of the information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR (CEQA Guidelines Sections 15088, 15132, and 15204).

1.4 COMMENTS ON THE DRAFT EIR

The Lead Agency, under the CEQA Guidelines §15086: Consultation Concerning Draft EIR, and §15088: Evaluation of and Response to Comments, is required to consult with and obtain comments from other public agencies who have jurisdiction or are included in the decision-making process of the project, and to provide the public an opportunity to comment on the project. The Lead Agency is required to respond in writing to substantive environmental comments.

Comments received during the public review period were submitted via email between September 25, 2025 and November 20, 2025.

1.5 LIST OF COMMENTERS

This section provides responses to written comments received during the 45-day public review period. The following tables provides a list of individuals that submitted comments on the Draft EIR during the public review period.

Comment Letter No.	Individual Commenters	Date of Comment
1	Christina Health	10/22/2025
2	Lisa Wintner	10/22/2025
3	P. Brown	10/28/2025
4	Grace Davis	10/22/2025
5	Mark Mariscal	09/28/2025
6	Dennis Hill	09/27/2025
7	Dennis Hill	10/22/2025

SECTION 2.0 – RESPONSES TO COMMENTS

2.1 INDIVIDUAL COMMENTS

Comment Letter #1:

From: [Christina Heath](#)
To: jhui@planning.lacounty.gov
Subject: Altadena Main Library
Date: Wednesday, October 22, 2025 2:59:34 PM

CAUTION: External Email. Proceed Responsibly.

I'm hoping that the new plans for the main library are better than what happened with Bob Lucas, which lost all of its charm and now resembles a shabby 60s rocket wannabe.

What the main library seems to want to be is less a library (about only 50%of the books it used to have) and more a social space. Doesn't anyone remember when libro meant written word? We do have a relatively new whole meeting center next to the sheriff station which seems to be seldom used. Whoever is now running the show at the library seems to have a tremendous ego and wants to become the "everything ".

Please bring back our beloved library!!

Thank you.

Christina Heath

Sent from my iPhone

Response to Comment Letter #1

Comment noted. The comment primarily addresses the merits of the Project design rather than potential environmental impacts analyzed under CEQA. CEQA requires evaluation of a project's potential environmental effects but does not mandate or evaluate the desirability of a project's underlying programmatic or policy objectives.

During Project planning, the County considered multiple design concepts and operational needs for the facility. Through this process, the County identified several objectives for the project, including maximizing use of the library space, improving user experience, improving seismic resilience, replacing aging infrastructure, and activating outdoor space to increase visibility and engagement. To meet these objectives, the Project proposes interior and exterior modification of the existing library. While traditional library functions such as book collections will continue to be provided, the proposed design also incorporates spaces intended to support broader community uses consistent with contemporary library services.

The comment does not identify any specific environmental impact that was omitted or inadequately analyzed in the DEIR. Therefore, no revisions to the DEIR are warranted.

Comment Letter #2:

From: Lisa Wintner <lisawintner1@gmail.com>

Sent: Wednesday, October 22, 2025 7:08 PM

To: Jolee Hui <JHui@planning.lacounty.gov>

Subject: RE: Altadena Main Library Renovation Project Draft Environmental Impact Report

CAUTION: External Email. Proceed Responsibly.

Hello,

I have a question regarding the building plans at the main Altadena library.

The Draft Environmental Impact Report says, "The Project would result in a significant and unavoidable environmental impact related to cultural (historic) resources."

What exactly is the "significant and unavoidable environmental impact to cultural (historic) resources"? Where exactly can I read about this impact?

Thank you,
Lisa. Wintner

Response to Comment Letter #2

A response to the commenter was provided via email on October 23, 2025 with the website location for viewing the Draft EIR and noted that relevant information can be found in Section 3.4 Cultural Resources (page 27) of the Draft EIR and Appendix C - Historic Resources Impact Assessment of the Draft EIR. No further comments regarding the Proposed Project were received from the commenter.

Comment Letter #3:

From: [p.brown](#)
To: jhui@planning.lacounty.gov
Subject: Comments: Altadena Main Library Renovation Project EIR, PRJ2023-000474
Date: Tuesday, October 28, 2025 8:47:25 PM

CAUTION: External Email. Proceed Responsibly.

Dear Ms. Hui:

While it is crazy that a project like this even requires a CEQA process, I wish to voice support for the project.

While a resident of Pasadena, I am a frequent user of the Altadena library, which has books that Pasadena does not have, and is, in my view, a pleasant place to use.


The Altadena Library building is a fine example of 1960s brutalist and modernist library architecture by a noted architect. But it needs upgrading some 60 years after its construction. The proposed project appears to be a thoughtful and sensitive update to the library building to better serve clients, including a necessary retrofit to address structural inadequacies and vulnerabilities and other changes to enhance ADA accessibility. The various changes to the building's architecture are a necessary price to pay for a better facility for Altadena and LA County patrons of the library. What is important is how the building serves the people.

I do note that the EIR states "The Proposed Project would continue to operate as a library and would not increase in capacity in a way that would result in a significant increase in GHG emissions." While I concur, I would also note that consideration perhaps could have been given to how the library can support further GHG mitigation. For example, in view of California Executive Order N-79-20, the installation of additional electric vehicle charging stations in the parking lot as part of the project would be beneficial. Perhaps the project does include such plans and I missed seeing them discussed in the EIR. In any case, it would be advantageous for more patrons to be able to charge their vehicles while using the library. Similarly, I did not see any discussion of the whether the project would incorporate rooftop solar. It is a missed opportunity for the library to contribute directly to advancing clean energy goals.

I urge that the Planning Department approve the project.

Thank you for all your and the entire Planning Department's hard work on behalf of LA County citizens.

Respectfully,

P.A. Brown (Mr.)


Response to Comment Letter #3:

Comment noted. Although not explicitly discussed in the Draft EIR, California Green Building Standards Code, as amended by Section 5.106.5.3.1 of the County Code of Ordinances, requires the Proposed Project to include Electric Vehicle (EV) capable spaces. EV-capable spaces are parking spaces with electrical infrastructure, like conduit and panel capacity, installed during construction to allow for the future addition of EV charging stations. The number of required EV capable spaces is determined based on Table 5.106.5.3.1 of County Code. The Project would include an underground conduit trench extending from the library building to the designated EV capable parking spaces, thus supporting the future installation of EV parking spaces.

Solar installation is not proposed as part of the Proposed Project. The Project involves renovation of the existing Main library and does not trigger the photovoltaic (PV) installation requirements that apply to newly constructed nonresidential buildings under the California Energy Code (Title 24, Part 6). In addition, a preliminary feasibility review determined that the existing roof does not provide enough area with adequate solar exposure to support an effective PV system. For these reasons, incorporating solar panels is not included in the current scope of work. The Project remains compliant with all applicable energy efficiency requirements, as described in 3.5.2 *Greenhouse Gasses* and Section 5.1.5 *Energy* of the Draft EIR.

Comment Letter #4

From: [Grace Davis](#)
To: jhui@planning.lacounty.gov
Subject: Altadena library comment
Date: Wednesday, October 22, 2025 1:53:13 PM

CAUTION: External Email. Proceed Responsibly.

So the whole town burns down and now you want to change one of the very few things that remains? Don't reconfigure the inside. Add on if you wish, but don't change the interior appearance.

Response to Comment Letter #4:

Comment noted. This comment primarily addresses the merits of the Project design rather than potential environmental impacts analyzed under CEQA. CEQA requires evaluation of a project's potential environmental effects but does not mandate or evaluate the desirability of a project's underlying programmatic or policy objectives.

As described above in Response to Comment #1, during Project planning, the County considered multiple design concepts and operational needs for the facility. Through this process, the County identified several objectives for the project, including maximizing use of the library space, improving user experience, improving seismic resilience, replacing aging infrastructure, and activating outdoor space to increase visibility and engagement. To meet these objectives, the Project proposes interior and exterior modification of the existing library. While traditional library functions such as book collections will continue to be provided, the proposed design also incorporates spaces intended to support broader community uses consistent with contemporary library services.

The comment does not identify any specific environmental impact that was omitted or inadequately analyzed in the DEIR. Therefore, no revisions to the DEIR are warranted.

Comment Letter #5:

From: mark.mariscal
To: jhui@planning.lacounty.gov
Subject: Comments on EIR draft of the Altadena Library main branch
Date: Sunday, September 28, 2025 10:31:00 AM

CAUTION: External Email. Proceed Responsibly.

I just want to say on the record that I am in support of this project. There have been numerous opportunities for community input over the last 2 years. I have personally attended a few of the meetings regarding the discussion of what would be included in the project. The proposed project takes many of those comments I heard and read about and have them included (or excluded depending what the comments focused on).

Mark Mariscal
Local Community Volunteer in Altadena

Response to Comment Letter #5:

Comment Noted.

Comment Letter #6:

From: [Dennis Hill](#)
To: jhui@planning.lacounty.gov
Subject: Altadena Library Renovation Draft EIR
Date: Saturday, September 27, 2025 2:30:32 PM

CAUTION: External Email. Proceed Responsibly.

My comments relate to the cultural resource impacts.

I agree that a HABS Level III documentation should be completed but it should also include the photographic and measured drawings components of a standard HABS project.

Also, digital copies should be distributed but one hard copy which includes the written history, the photography (negatives, prints, index and photo key) as well as the measured drawings should be archived at the Library of Congress as a voluntary submittal after review by the National Park Service (unless it becomes a requirement under Section 106). This way, once scanned and archived, it can be made available to the general public as well as for scholarly research via the internet.

Dennis Hill, Content Creation



creator@dennishill.com
www.dennishill.com



Response to Comment Letter #6

We appreciate the concern for adequate and accessible historical documentation of the Main. As discussed in MM CUL-1, the Proposed Project shall prepare historical documentation of the Main based on the National Park Service (NPS) Historic American Buildings Survey (HABS) Level III format and content requirements. According to the Secretary of the Interior's (SOI) Guidelines for Architectural and Engineering Documentation (SOI Guidelines), Level III HABS documentation includes photographs with large-format negatives of exterior and interior views³. Measured drawings are not standard for Level III HABS documentation and, thus, would not be a component of the Project's MM CUL-1 HABS documentation.

Furthermore, the SOI Guidelines explains why the use of measured drawings would be inappropriate for smaller scale projects: "The kind and amount of [HABS] documentation should be appropriate to the nature and significance of the subject. For example, Level I would be inappropriate for a building that is a minor element of an historic district, notable only for context and scale. A full set of measured drawings for such a minor building would be expensive and would likely add little new insight into the growth and development of the built environment at either the local, regional, or national level. Large-format photography (Level III) would be the more appropriate choice for documenting this type of building"³.

CEQA allows the lead agency discretion to determine the appropriate level of documentation. The County, as Lead Agency, determined that Level III HABS documentation is the level commensurate with the nature and intensity of the Project's impacts, and a higher level of documentation (e.g. measured drawings) would not further reduce the impact to less than significant. CEQA Guidelines §15126.4(b)(2) confirms that in some circumstances, documentation of a historic resource (such as a HABS) as a mitigation for demolition of a historic resource will not mitigate the effects to a point where clearly no significant effect on the environment would occur. Because the impact on cultural resources would remain significant and unavoidable, regardless of the extent of historical documentation, the County has adopted a Statement of Overriding Considerations identifying the public benefits of the proposed library renovation that outweigh the Project's unavoidable historic resource impact (see Appendix C).

The Main is not being documented to federal HABS standards, and the Project has no federal nexus; therefore, the federal HABS submission requirements, including submittal to the Library of Congress, do not apply. Requirements for measured drawings and Library of Congress submission are generally tied to Section 106 review under the National Historic Preservation Act, which is not triggered here because the Project does not involve a federal undertaking (54 U.S.C. §306108).

Because the Project has no federal nexus, is not undergoing Section 106 review, and the County did not require higher level HABS documentation, there is no regulatory basis requiring measured drawings or submission to the Library of Congress.

Although the HABS documentation will not be submitted to the Library of Congress, it will be available at the Main and California Historical Resources Information System (CHRIS) South Central Coastal

³ National Park Service. *Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation: HABS/HAER Standards*. 1990. <https://npshistory.com/publications/habs-haer-hals/habs-haer-stds-1990.pdf>.

Information Center (SCCIC) and, if requested, at the Long Beach Public Library and Long Beach Heritage Museum (see MM CUL-1).

Therefore, the additional measures requested by the commenter are not required and would not constitute appropriate CEQA mitigation.

Comment Letter #7

From: [Dennis Hill](#)
To: jhui@planning.lacounty.gov
Subject: Altadena Library
Date: Wednesday, October 22, 2025 2:43:26 PM

CAUTION: External Email. Proceed Responsibly.

Although the revisions of the Altadena Library are of less than significant impact, it is still a historic and cultural landmark for the community.

I strongly urge that a Historic American Buildings Survey (HABS) documentation be completed before any work is started, including exploratory work.

Even if measured drawings and a written history is not completed, a photographic survey using large format camera with black and white film should be done. It can be archived at the Altadena Library in addition to the Library of Congress in Washington DC., utilizing the National Park Service voluntary submittal process.

Dennis Hill, Content Creation



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Response to Comment Letter #7

MM CUL-1 requires that the HABS-like documentation occurs prior to any demolition. Activities conducted before demolition would not alter or remove character-defining features of the Altadena Library and would not affect its historical significance; therefore, the pre-demolition documentation would fully capture the building's historical and architectural features. Completing the HABS prior to exploratory work would not be a necessary requirement.

See the Response to Comment Letter #6 above.

SECTION 3.0 – DRAFT EIR REVISIONS

CEQA requires that a Final EIR identify any changes made to the Draft EIR in response to public review (CEQA Guidelines §15088). Comments were received on the Draft EIR and responses contained in Section 2.0 have been prepared in accordance with CEQA Guidelines §15088(b).

None of the criteria for recirculation set forth in the CEQA Guidelines §15088.5 for recirculation have been met, including:

- No new significant environmental impacts due to the project or due to a new mitigation measure has been identified;
- No substantial increase in the severity of an environmental impact has been identified; and
- No additional feasible project alternative or mitigate measure considerably different from others analyzed in the DEIR has been identified that would clearly lessen the significant environmental impacts of the project.

It is common, and in most cases necessary, to amplify and elaborate on the analysis of an EIR. CEQA anticipates this and such amplification does not constitute significant new "information" unless it triggers one of the four categories described in State CEQA Guidelines Section 15088.5(a). State CEQA Guidelines Section 15088.5(b) provides that "recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR."

Minor revisions have been made to the Project site plans since publication of the Draft EIR. The revised plans reflect a slightly reduced Project footprint and less intensive modification of the existing Altadena Main Library building. Additional revisions unrelated to the Project Description clarify findings and improve the accuracy of the Draft EIR and do not alter the impact determinations. Based upon review of the minor corrections and additions identified in Table 3 below, the minor corrections and additions result in a reduced development footprint and do not result in any new or substantially increased significant impacts. Therefore, the County has concluded that recirculation of the Draft EIR is not required.

The revisions are reflected in the errata included with this Final EIR, which provides a marked-up version of the Draft EIR showing changes using underline and strike-through formatting. Table 3 below identifies all revisions made to the Draft EIR.

Table 3. Revisions to Draft EIR

Topic	Revisions to DEIR	Section in DEIR
Project Description	<p>Project Components</p> <p>Project features shown in Figure 3 include the following:</p> <ul style="list-style-type: none"> • New Entry/Lobby • New Community Room Deck • New Outdoor Reading Court • New Delivery Loading Zone • <u>New Staff Delivery Area</u> • New Entry Wall and Signage • New Access Ramp • New Stairs • Parking lot Re-surfaced and Striped • Refurbishment of Existing <u>Footbridges</u> 	E.S.4 PROJECT DESCRIPTION (pg. ES-2)
Project Description	<p>Demolition</p> <p>Some demolition and grading are required to complete the Main renovation and expansion. The site is approximately 1.72 acres, with 0.28 acres being disturbed for improvements. Demolition includes removal of concrete, pavement, and existing turf, planters, and shrubs. Grading is designed to slope walking paths, landscapes, and other surfaces away from buildings toward on-site drainage features. Areas of pavement and concrete removal include the area for the new entry/lobby along the south side of the Main and walkways leading to the bridge on the north side of the facility. Clearing and grubbing would occur at the new outdoor reading court, <u>and</u> the new entry/lobby, near the path to the bridge on the north side, and the new Community Room deck. In the interior there would be some demolition of non-structural walls, doors, and stairways.</p>	E.S.4 PROJECT DESCRIPTION (pg. ES-2) 2.5 PROJECT DESCRIPTION (pg. 7)
Project Description	<p>Project Components</p>	2.5 PROJECT DESCRIPTION (pg. 8)

	<p>Project features shown in Figure 3 include the following:</p> <ul style="list-style-type: none"> • New Entry/Lobby • New Community Room Deck • New Outdoor Reading Court • New Delivery Loading Zone • New Entry Wall and Signage • New Access Ramp • New Stairs • Parking lot Re-surfaced and Striped • Refurbish Existing Bridges • <u>Easement along the northwest portion of the Project site</u> 	
Project Description	<p>Exterior Renovations</p> <p>The new pedestrian entry sequence on Mariposa will start with a new low signage wall and a new direct connection to the existing bridge. The new Reading Court North Patio will accommodate events and daily functions, programs and events such as children’s storytimes and book club meetings, <u>and includes a sunken reading court with terraced seating.</u> At the building’s southeast corner, the Community Room Ddeck extends a raised deck from the building. The new southern edge of the building will provide parking for approximately <u>six short-term and two long-term bicycle parking</u> 4 bicycles to the east, with planted walkways moving west to the new main building entrance.</p>	2.5 PROJECT DESCRIPTION (pg. 8)
Figures	Revised site plan for Figure 3.	Figure 3 – Site Plan (pg. 13)
Cultural Resources	<p>Threshold (a)</p> <p>As determined by the <i>Historical Resource Impact Assessment Report</i> prepared by Kleinfelder, the Altadena Main Library is eligible for listing in the National Register, California Register, and as a Los Angeles County Landmark under Criteria A/1/A.1 and C/3/A.3. The Altadena Main Library’s association with the increase in civic services resulting from Altadena’s</p>	3.4 CULTURAL RESOURCES (pg. 39)

	<p>postwar population boom as well as for being an excellent example of Mid-Century Modern architecture designed by noted architect Boyd Georgi. The property also appears eligible for listing as a Los Angeles County Landmark under Criterion A.7 for its integral landscape, designed by Eriksson, Peters & Thoms. The library’s period of significance is 1967, corresponding with its date of construction. <u>Because the Project would remove or alter several character-defining features, resulting in a loss of integrity of design, materials, workmanship, and feeling, the Altadena Main Library would likely no longer retain the historic integrity required for eligibility in the NRHP, CRHR, or County Landmark designation.</u> Therefore, a significant and unavoidable impact would occur in this regard.</p>	
<p>Alternatives</p>	<p>CWA Renovation and Expansion Design</p> <p>CWA is a private architectural firm that was commissioned by Altadena Library District to provide a Renovation and Expansion design for Altadena Main Library. This alternative includes three areas of expansion that would significantly impact both the exterior and interior of the building:</p> <ol style="list-style-type: none"> 1. <u>Approximate 12,000 square foot expansion of the Main Level into the northern portion of the property</u> 2. <u>Approximate 4,000 square foot expansion of the Main Level into the eastern portion of the property</u> 3. <u>Approximate 1,500 square foot expansion of the lower level within the western portion of the property</u> <p><u>The CWA design almost doubles the square footage of the library with a large addition to the north side of the library. Although the functional layout of this design meets many of the Project objectives related to universal design, health, safety and security, and technology, the proposed interior changes and addition would have a greater impact on the historic character of the Main than the Proposed Project, as they would result in more substantial alteration of character-defining features and the loss of historic materials. It also does not provide expanded outdoor programming areas.</u></p>	<p>4.3 ALTERNATIVES CONSIDERED BUT REJECTED (pg. 69)</p>

	<p>Furthermore, based on the estimated project cost of \$18.3 million in 2009, this alternate design would likely cost around \$30 million, far exceeding the project budget.</p> <p>Such modification, compared to the Proposed Project, would result in a greater alteration of character-defining features and destruction of historic materials. This alternative is considered unfeasible because it would exceed the Project’s budget and it would not meet the following project objectives:</p> <ul style="list-style-type: none"> ▪ Provide outdoor programming spaces. ▪ Minimize the impact on the historic nature of the original mid-century modern design. 	
<p>Alternatives</p>	<p>ARG Design</p> <p>This alternative was proposed by ARG in their 2020 <u>Altadena Library Master Plan</u>. This design includes ADA upgrades on the exterior of the building, and expansion of the staff area on the lower level. The design also addresses seismic upgrades, fire and life safety upgrades, and hazardous materials abatement. This design includes exterior ramp work to comply with ADA requirements; however, it has minimal impact to the building’s exterior compared to the Proposed Project. The alternative project’s interior is impacted to a lesser degree than the Proposed Project, but does alter spatial relationships (i.e. the openness of the main level). Figure 4 below includes a conceptual site plan for the ARG Alternative.</p>	<p>4.4 ALTERNATIVES ANALYZED (pg. 73)</p>
<p>Alternatives</p>	<p>Conclusion and Relationship to Project Objectives</p> <p>The ARG Alternative would address ADA and some functional needs, seismic upgrades, fire and life safety upgrades, and hazardous materials abatement. The ARG Alternative is not environmentally superior to the Proposed Project. Additionally, the ARG Alternative would not contribute to the project objectives including centralizing staff work areas, providing after-hours access to certain spaces of the library including passport services, and the ARG alternative would only partially support the CEQA Project</p>	<p>4.4 ALTERNATIVES ANALYZED (pg. 77)</p>

	<p>Objectives to repair deteriorated historic features rather than replace them, and retain and preserve historic character.</p> <p><u>Under the ARG plan, the lower level is primarily used for staff spaces, and public areas are accessed through a less direct path using interior stairs or an elevator. This layout would make it harder for visitors to find and access key services and does not provide a clear, visible public entrance.</u></p> <p><u>The Project’s objectives include providing accessible and well-organized public spaces, such as passport services, meeting rooms, the fabrication lab, and the bookstore. Because the ARG alternative does not place these uses in prominent, easily accessible locations, it would be less effective in meeting these goals.</u></p> <p><u>The ARG alternative would also be less consistent with the objective of allowing after-hours public access while keeping staff and library collections secure. The less direct circulation and lack of a clearly defined entry point could make it more difficult to separate public and restricted areas.</u></p> <p><u>The ARG alternative would result in similar impacts as the Proposed Project with respect to historic resources. While the ARG alternative would result in less intensive interior and exterior modification than the Proposed Project, it would still likely result in the Main being ineligible for listing in the CRHR, NRHP, or County Landmark designation because it would alter some character-defining features and remove/destroy historic materials. These alterations would result in an overall loss of integrity of materials, design, workmanship, and feeling.</u></p>	
List of preparers	<p>Lead Agency/Reviewers</p> <p>Altadena Library District County of Los Angeles Department of Regional Planning</p>	7.0 REPORT PREPARATION (pg.104)
Biological Resources	<p>MM BIO-1 Tree Survey, Protection Replacement, and Maintenance. The District shall retain a certified arborist to conduct a tree survey and</p>	5.1.3 Biological Resources (pg. 82)

	<p>complete a report on the trees subject to removal. The report shall contain the type, size, and condition of the trees proposed for removal. The Tree report shall be submitted to the County to determine the replacement requirements for the trees to comply with County ordinances.</p> <p><u>Prior to the issuance of any grading permits, the Altadena Library District shall retain a certified arborist to conduct a tree survey and complete a report identifying all trees proposed for removal. The report shall include, at a minimum, the species, size (diameter at breast height), health condition, and location of each tree. The Tree Survey and Report shall be submitted to the County for review and approval to determine applicable tree replacement requirements in accordance with County ordinances. The Altadena Library District shall implement all required replacement measures as determined by the County. Any new or replacement oak trees shall consist of native oak species to avoid hybridization with non-native oak species.</u></p> <p><u>Any pruning of oak trees shall be conducted in accordance with County Code Chapter 22.174, which states that maintenance shall be limited to medium pruning of branches not exceeding two (2) inches in diameter, unless otherwise approved by the County, and shall be conducted in accordance with the guidelines of the International Society of Arboriculture to ensure the continued health of protected trees. The protection, maintenance, and care of all oak trees, regardless of size, shall be conducted in accordance with: (1) the recommendations of the certified arborist or County Forester; (2) applicable County guidance documents, including the Oak Trees: Care and Maintenance Guide; and (3) the oak tree reports prepared for Oak Tree Permit No. RPPL2025003986. All such measures shall be implemented throughout construction and for any post-construction maintenance period required by the County.</u></p>	
<p>Threshold (e)</p>	<p>Less than Significant with Mitigation. Under the Proposed Project, 48 trees would be protected in place, and <u>9-nine</u> trees would be removed. Of the</p>	<p>5.1.3 Biological Resources (pg. 83)</p>

trees to be protected in place, two are coast live oaks (*Quercus agrifolia*). Although the coast live oak trees would not be removed, proposed encroachments within the tree's protected root zones will require discretionary approval of an Oak Tree Permit pursuant to Chapter 22.174 of the County Code. Approval of the Oak Tree Permit will require measures such as preservation of the tree in place, relocation of the tree, replacement of the tree, or payment into the Oak Forests Special Fund.

All other trees and shrubbery proposed for protection in place or removal are non-native ornamental species not protected under the County Code. As part of the proposed landscape plan, three non-invasive drought-tolerant coast live oak trees (two coast live oaks and one Holly oak) will be planted onsite along with other landscape shrubbery and vegetative groundcover. The proposed utility undergrounding and landscaping work would encroach into the protected zone of the two existing oak trees. Furthermore, routine tree maintenance including removing of dead branches or overgrown branches on the ordinance-sized oak trees are also expected to occur during project operation. Any future tree maintenance shall be limited to medium pruning of branches not to exceed two inches in diameter in accordance with guidelines published by the International Society of Arboriculture intended to ensure the continued health of a protected tree.

~~Six new trees are currently proposed, including large specimens at the North Patio and Community Plaza. However, the County Municipal Code for Altadena Community Standards (Municipal Code 22.306(3)(d)) requires that mature trees are preserved as part of a CUP that would be required for the Proposed Project. This could result in a significant impact associated with conflicting with a local ordinance. The Project shall comply with applicable County Fire Department standards and requirements as it pertains to the County Oak Tree Permit Ordinance (Chapter 22.174 of the County Municipal Code). Implementation of Mitigation Measure BIO-1 would reduce the impact associated with conflicting with local ordinances to less than significant.~~

Transportation	<p>Threshold (c)</p> <p>Less than Significant Impact. The Proposed Project includes a new driveway with <u>a staff delivery area</u> and staff parking from Mariposa Street. The driveway would be approximately 50 feet to the east of the Altadena Senior Center driveway and would not result in increased hazards due to design features. The changes would occur on the Project site and do not include significant adjustments to the roadways or signals. The Proposed Project uses are compatible with the existing land uses. Less than significant impacts would occur associated with hazards due to a design feature or incompatible uses.</p>	5.1 EFFECTS NOT FOUND TO BE SIGNIFICANT (pg. 96)
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SECTION 4.0 – REPORT PREPARATION

Name	Project Role
Lead Agency/Reviewers	County of Los Angeles
CEQA Consultant – Chambers Group, Inc.	Thomas Strand Eunice Bagwan Aliya Glick
Chambers Group Subconsultant	Ldn Consulting, Inc. Kleinfelder

SECTION 5.0 – ACRONYMS AND ABBREVIATIONS

Term	Definition
ADA	Americans with Disabilities Act
ARG	Architectural Resources Group
AV	Audio Visual
CEQA	California Environmental Quality Act
CHRIS	California Historical Resources Information System
County	Los Angeles County
CRHR	California Historical Resources Information System
CUP	Conditional Use Permit
CWA	CWA Architecture
District	Altadena Library District
DEIR	Draft Environmental Impact Report
EIR	Environmental Impact Report
EV	Electric Vehicle
FEIR	Final Environmental Impact Report
HABS	Historic American Buildings Survey
HVAC	Heating Ventilation Air Conditioning
LID	Low Impact Development
Main	Altadena Main Library
MM	Mitigation Measure
NPS	National Park Service
NRHP	National Register of Historic Places
PDF	Project Design Feature
PV	Photovoltaic
SCCIC	South Central Coastal Information Center
SOI	Secretary of the Interior
TCR	Tribal Cultural Resources