City of Huntington Beach Notice of Preparation and Notice of Scoping Meeting *Palm/Goldenwest Specific Plan Amendment Project*

Date: February 6, 2026

To: Responsible and Trustee Agencies, Interested Organizations, and Individuals Office of Planning and Research County of Orange Clerk-Recorder

From: City of Huntington Beach (Lead Agency) Department of Community Development 2000 Main Street, Huntington Beach, CA 92648

Subject: Notice of Preparation (NOP) of a Draft Environmental Impact Report and Notice of a Public Scoping Meeting for the Palm/Goldenwest Specific Plan Amendment Project

Project Location: 20101 Goldenwest Street, Huntington Beach CA 92648

Notice of Preparation Review Period: February 6, 2026 – March 9, 2026

Scoping Meeting: To be held in-person on February 18, 2026, 6:30 p.m. – 7:30 p.m. Further information below.

Notice is hereby given by the Department of Community Development of the City of Huntington Beach that the following Notice of Preparation of a Draft Environmental Impact Report (DEIR) has been prepared for the Palm/Goldenwest Specific Plan Amendment Project. The Notice of Preparation will be available for public review and comment for 30 days commencing Friday, February 6, 2026 and ending Monday, March 9, 2026.

The City of Huntington Beach, the Lead Agency for the Palm/Goldenwest Specific Plan Amendment Project, is undertaking environmental review under CEQA. The City has prepared an Initial Study (IS) for the proposed project. Based on the results of the IS, which is available for review on the City's website, the City has determined that the proposed project could result in impacts related to aesthetics, air quality, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, transportation, tribal cultural resources, and utilities and service systems. These topics will be analyzed in the DEIR. Mitigation will be developed and included in the DEIR, if necessary, to address the proposed project's potentially significant adverse effects.

PROJECT LOCATION: The project site is located at 20101 Goldenwest Street, comprising approximately 92 acres of the 146-acre Palm/Goldenwest Specific Plan (PGSP) Area. The City's General Plan Land Use Element currently designates the entire project site for Commercial Visitor (CV) land uses with a Specific Plan overlay. Zoning of the project site is governed by the Palm/Goldenwest Specific Plan, which designates the project site for a mix of Commercial/Office/Visitor Serving, Open Space/Civic, and Visitor Serving Commercial land uses. The project site is also located within the California Coastal Zone, as defined by the California Coastal Act of 1976. The project site is currently developed with industrial (oil and gas production) uses as well as a generally undeveloped

area consisting of vegetation and a paved road that provides vehicular access from Seapoint Street to the oil and gas facilities in the Bolsa Chica Lowlands. Vehicular access to the existing project site is provided via secure full-access driveways, including one driveway along Goldenwest Street and one driveway along Seapoint Street. Currently, no points of vehicular entry to the project site exist along Pacific Coast Highway (PCH) or Palm Avenue. The portion of the project site north of Seapoint Street is currently accessible via a third secure all-access driveway along Seapoint Street.

PROJECT DESCRIPTION: The proposed project approvals would facilitate the future redevelopment of the 92-acre project site, including the demolition and removal of existing oil and gas production infrastructure and the future construction of up to 800 residential units, up to 350 hotel rooms or other permitted visitor-serving uses, and various open space and park areas. Future buildout of the site would include new vehicular access points and internal circulation roadways, informational signage, utility and infrastructure connections, and multi-use paths.

Under the proposed PGSP Amendment, the project site would be divided into three planning areas: Planning Area 1 (16 acres of Commercial Visitor uses), Planning Area 2 (53.2 acres of Medium Density Residential uses, which would be subdivided into Planning Areas 2A [30.8 acres] and 2B [22.4 acres]), and Planning Area 3 (22.8 acres of open space/park uses, which would be subdivided into Planning Area 3A [19.7 acres] and 3B [3.1 acres]).

Project-specific design details for future residential and commercial development facilitated by approval of the proposed project are unknown at this time. Each future discretionary project facilitated by the proposed project would be subject to a project-specific CEQA review at the time it is proposed for consideration by the City. In order to streamline the process of future CEQA review, the proposed project conservatively analyzes a “worst-case” scenario of development, or the maximum allowable scale of future development allowed under applicable development standards as set forth in the Draft Amended PGSP.

REVIEWS AND APPROVALS: The following discretionary actions are required by the City:

- Certification/Adoption of the Environmental Impact Report (EIR) prepared for the proposed project;
- General Plan Amendment to change the land use designation of the project site from Commercial Visitor (CV) to a mix of CV, Medium Density Residential (RM), and Open Space-Park (OS-P) land uses;
- Specific Plan Amendment to allow Medium Density Residential as a permitted use within Planning Area 2 of the Palm/Goldenwest Specific Plan Area and to provide background information, requirements, and standards related to the proposed project;
- Local Costal Program Amendment to be certified by the California Coastal Commission; and
- Any other necessary discretionary (Coastal Development Permits) or ministerial permits and approvals required for the construction and operation of the proposed project.

City of Huntington Beach Notice of Preparation and Notice of Scoping Meeting *Palm/Goldenwest Specific Plan Amendment Project*

SCOPING MEETING: Pursuant to Section 21083.9 of the Public Resources Code, a scoping meeting will be held for the general public and responsible and trustee public agencies. The purpose of the scoping meeting is to learn about the proposed project, review the anticipated scope of the DEIR, and assist the City in identifying the range of actions, alternatives, mitigation measures, and potentially significant effects to be analyzed in depth in the DEIR. Below the date, time and location of the scoping meeting is provided.

SCOPING MEETING DATE & TIME:

> **IN-PERSON MEETING:** Wednesday, February 18, 2026 from 6:30 PM to 7:30 PM
> **LOCATION:** Huntington Beach City Hall, Lower Level Rooms B-7 and B-8, 2000 Main Street, Huntington Beach CA 92648

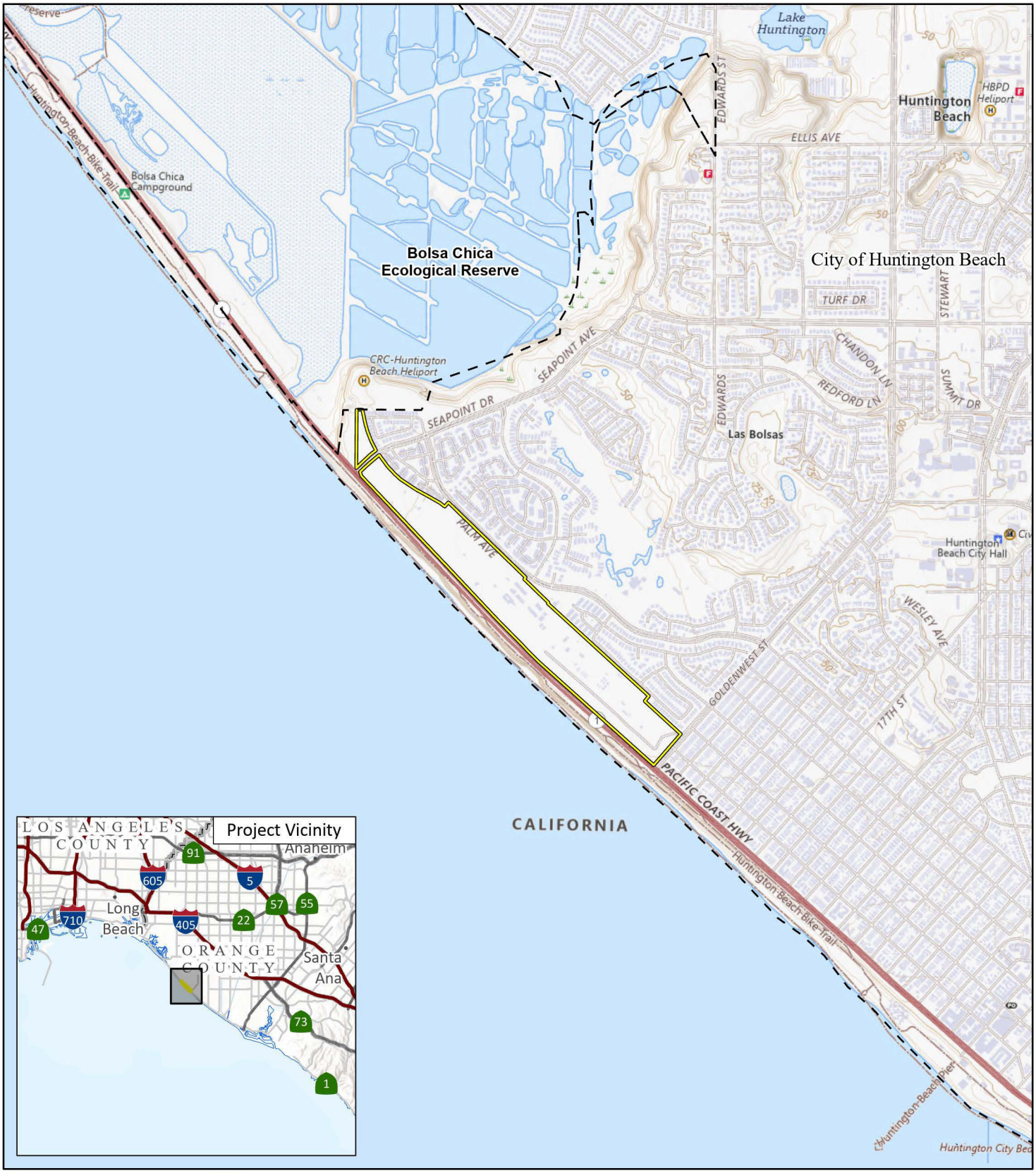
PUBLIC REVIEW AND COMMENT PERIOD: A 30-day public review period for submitting comments on the scope of the DEIR starts on **Friday, February 6, 2026 and ends on Monday, March 9, 2026 at 5:00 p.m.** All comments need to be mailed or submitted no later than 5:00 p.m. on March 9, 2026. Please send your response, including your name, address, and concerns, to: Joanna Cortez, Principal Planner, City of Huntington Beach, Community Development Department, 2000 Main Street, Huntington Beach, CA 92648 or via e-mail to: Joanna.Cortez@surfcity-hb.org

The NOP, related Initial Study (IS), and other project documents can also be accessed online at: https://www.huntingtonbeachca.gov/business_detail_T9_R682.php

Additionally, copies of the NOP and IS are also available for review at the following locations:

- Huntington Beach City Hall, Department of Community Development, 3rd Floor, 2000 Main Street, Huntington Beach, CA 92648; Monday – Friday, 8:00 a.m. – 5:00 p.m.
- Huntington Beach City Hall, City Clerk, 2nd Floor, 2000 Main Street, Huntington Beach, CA 92648; Monday – Friday, 8:00 a.m. – 5:00 p.m.
- Central Library, 7111 Talbert Avenue, Huntington Beach, CA 92648; hours vary, see website: https://www.huntingtonbeachca.gov/departments/library/contact_us_about/branch_information/index.php

Attachment:
Figure 1 – Project Location and Vicinity



LSA

Project Site

City Boundary

FIGURE 1

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FEET

SOURCE: USGS The National Map (2018)

Palm/Goldenwest Specific Plan Amendment Project

Project Location and Vicinity

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LSA

CARLSBAD
CLOVIS
EMERYVILLE
IRVINE
LOS ANGELES
PALM SPRINGS
RIVERSIDE
ROSEVILLE
SAN LUIS OBISPO

MEMORANDUM

DATE: March 30, 2026

TO: Joanna Cortez, Principal Planner, City of Huntington Beach

FROM: Laurel Huntzinger, Associate Planner
Ryan Bensley, Principal

SUBJECT: Palm/Goldenwest Specific Plan Amendment Project Scoping Comments Summary

In accordance with *State CEQA Guidelines* Section 15082, the City submitted a Notice of Preparation (NOP) along with an Initial Study for this project to the State Clearinghouse (SCH) on February 6, 2026 (SCH No. 2026020245). The NOP was also filed with the Orange County Clerk and published in the Huntington Beach Wave, the City's newspaper of record, on February 5, 2026. In addition, the NOP was mailed to an extensive list of recipients, including adjacent property owners and occupants of the properties located within 300 feet of the project site. The City also held a public scoping meeting on February 18, 2026, to solicit input from the public on topics to be analyzed in this EIR. The meeting was held at the Huntington Beach City Hall, Lower Level Rooms B-7 and B-8, at 2000 Main Street, in Huntington Beach, CA.

The public scoping period lasted 32 days, beginning on Friday, February 6, 2026, and concluding on Monday, March 9, 2026. During this time, written comments were solicited on environmental issues that should be evaluated in the EIR. Table A provides a summary of the comments received during the public scoping period, including those given at the public scoping meeting. Copies of the written comments received are provided in Attachment A.

Table A: Summary of Scoping Comments Received

Letter No.	Agency/ Organization/ Individual	Date	Issues	Addressed in EIR?
1	Native American Heritage Commission (NAHC)	February 9, 2026	Assembly Bill 52/Senate Bill 18 requirements	Yes
2	Brian Reilly	February 14, 2026	Coastal erosion	Yes
3	Mark Dewey	February 15, 2026	Hazards and hazardous materials, air quality, construction noise, population density, infrastructure	Yes
4	Rob Kerchner	February 18, 2026	Support for the project	No
5	Jim Veronin	February 20, 2026	Infrastructure, cumulative impacts	Yes
6	Jonathan Kiester	February 20, 2026	Pedestrian safety, vehicular access, traffic signalization	Yes

Table A: Summary of Scoping Comments Received

Letter No.	Agency/ Organization/ Individual	Date	Issues	Addressed in EIR?
7	Ken Weiss	February 20, 2026	Air quality, beach and wetlands protection, energy, GHG emissions, hazards and hazardous materials, hydrology, housing density, service systems, transportation/traffic, cumulative impacts	Yes
8	Tuni Sullivan	February 20, 2026	Construction impacts, wildlife/habitat disturbance, hazards and hazardous materials, air quality, population/housing, transportation/traffic, water infrastructure	Yes
9	Isabella Ford	February 23, 2026	Recreation, biological resources, coastal erosion, transportation safety, traffic	Yes
10	Sheilla Holiday	February 27, 2026	Recreation	No
11	Isabella Ford (Follow-up)	March 2, 2026	Traffic	Yes
12	Andrei Soumzine and Margarita Burk	March 2, 2026	Construction-period dust and noise, traffic noise, pedestrian beach and park access, utility infrastructure	Yes
13	California Department of Fish and Wildlife (CDFW)	March 4, 2026	Request to extend the comment period to allow for a later CDFW comment	No
14	Jani Mae Den Herder	March 4, 2026	Parking, traffic, pedestrian safety, air quality, hazards and hazardous materials	Yes
15	Southern California Association of Governments (SCAG)	March 5, 2026	RTP/SCS consistency, population and housing, GHG emissions	Yes
16	South Coast Air Quality Management District (SCAQMD)	March 5, 2026	Air quality, GHG emissions, hazards and hazardous materials, health risks	Yes
17	California Coastal Commission (CCC)	March 6, 2026	Land use, public coastal access, parking, transit, tribal cultural resources, population and housing, water quality, biological resources	Yes
18	Boardwalk Community Association	March 6, 2026	Aesthetics, air quality, biological resources, cultural resources, energy, geology and soils, GHG emissions, hazards and hazardous materials, hydrology, land use and planning, mineral resources, noise/vibration, population and housing, public services, recreation, transportation, tribal cultural resources, wildfire	Yes
19	Tom Sizlo	March 7, 2026	Aesthetics, building design and materials, landscaping, transportation, hazards and hazardous materials, construction-period dust and noise, security lighting, pest control, maintenance	Yes
20	Tom Telly	March 7, 2026	Noise/vibration, lighting, air quality, wildlife corridors, nesting wildlife, property values	Yes
21	Manal Tadros	March 7, 2026	Aesthetics, hazards and hazardous materials, transportation, traffic, air	Yes

Table A: Summary of Scoping Comments Received

Letter No.	Agency/ Organization/ Individual	Date	Issues	Addressed in EIR?
			quality, GHG emissions, hydrology and water quality, public services, utilities, cultural resources, tribal cultural resources, alternatives	
22	Peter Mouritz	March 8, 2026	Open space, pedestrian facilities, quality of life, noise, hotel occupancy, traffic, hazards and hazardous materials, wildlife/nesting birds	Yes
23	Steve K	March 8, 2026	Parking, population and housing, transportation, traffic, air quality, recreation, aesthetics, mitigation, noise, security, signage, drainage, beach facilities, lighting, odors, school facilities	Yes
24	Bolsa Chica Land Trust	March 9, 2026	Biological resources, tribal cultural resources	Yes
25	Brian Merhar	March 9, 2026	Recreation/site design	No
26	California Geologic Energy Management Division (CalGEM)	March 9, 2026	Geology and soils, hazards and hazardous materials	Yes
27	Caltrans	March 9, 2026	Transportation, coastal access, parking,	Yes
28	Eric Bonholtzer	March 9, 2026	Traffic, air quality, GHG emissions, biological resources, hazards and hazardous materials, construction-period air quality and noise, mitigation, water supply, hydrology and water quality, cumulative impacts, alternatives, CEQA requirements	Yes
29	Orange County Transportation Authority (OCTA)	March 9, 2026	Transportation	Yes
30	Simon Cail	March 9, 2026	Air quality, hazards and hazardous materials, construction-period noise	Yes
31	Tom Sizlo (Follow-up)	March 9, 2026	Site access, transportation, emergency access	Yes
32	Denise Nguyen	March 9, 2026	Biological resources, land use, hazards and hazardous materials	Yes
33	Mike and Brooke Wright	March 9, 2026	Coastal Act consistency, transportation, traffic, hazards and hazardous materials, evacuation, public services, parking, sea level rise/coastal hazards	Yes
34	California Department of Fish and Wildlife (CDFW)	March 23, 2026*	Biological resources, cumulative impacts, indirect impacts, mitigation, hydrology and water quality, lighting, noise, recreation	Yes

*As requested in its letter dated March 4, 2026 (Letter 13), the California Department of Fish and Wildlife (CDFW) was granted a comment period extension by the City.

ATTACHMENT A

NOP COMMENT LETTERS

NATIVE AMERICAN HERITAGE COMMISSION

CHAIRPERSON
Reginald Pagaling
Chumash

VICE-CHAIRPERSON
Buffy McQuillen
Yokayo Pomo, Yuki, Nomlaki

SECRETARY
Isaac Bojorquez
Ohlone-Costanoan

PARLIAMENTARIAN
Wayne Nelson
Luiseño

COMMISSIONER
Sara Dutschke
Miwok

COMMISSIONER
Stanley Rodriguez
Kumeyaay

COMMISSIONER
Bennae Calac
Pauma-Yuima Band of Luiseño Indians

COMMISSIONER
Vacant

COMMISSIONER
Vacant

EXECUTIVE SECRETARY
Andrew Alejandre
Paskenta Band of Nomlaki Indians

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov

February 9, 2026

Joanna Cortez
City of Huntington Beach
2000 Main Street
Huntington Beach CA 92648

Re: 2026020245 Palm/Goldenwest Specific Plan Amendment Project, Orange County

To Whom It May Concern:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements**. If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- **a.** A brief description of the project.
- **b.** The lead agency contact information.
- **c.** Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- **d.** A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

- **a.** For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- **a.** Alternatives to the project.
- **b.** Recommended mitigation measures.
- **c.** Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:

- **a.** Type of environmental review necessary.
- **b.** Significance of the tribal cultural resources.
- **c.** Significance of the project's impacts on tribal cultural resources.
- **d.** If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- **a.** Whether the proposed project has a significant impact on an identified tribal cultural resource.
- **b.** Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:

a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or

b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

a. Avoidance and preservation of the resources in place, including, but not limited to:

i. Planning and construction to avoid the resources and protect the cultural and natural context.

ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.

b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:

i. Protecting the cultural character and integrity of the resource.

ii. Protecting the traditional use of the resource.

iii. Protecting the confidentiality of the resource.

c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.

d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).

e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).

f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.

b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.

c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).

2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.

3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).

4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:

- **a.** The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
- **b.** Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:

- **a.** If part or all of the APE has been previously surveyed for cultural resources.
- **b.** If any known cultural resources have already been recorded on or adjacent to the APE.
- **c.** If the probability is low, moderate, or high that cultural resources are located in the APE.
- **d.** If a survey is required to determine whether previously unrecorded cultural resources are present.

2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.

- **a.** The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
- **b.** The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:

a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.

b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.

a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.

b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.

c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Andrew.Green@NAHC.ca.gov.

Sincerely,

Andrew Green

Andrew Green
Cultural Resources Analyst

cc: State Clearinghouse

From: Brian Reilly <[redacted]>
Sent: Saturday, February 14, 2026 10:23 PM
To: Cortez, Joanna
Subject: Palm/Goldenwest Specific Plan Amendment Project - Area Erosion Comment

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: IMPORTANT

You don't often get email from [redacted] Learn why this is important

Dear Ms Cortez,

I am writing to provide resident comments on the project plan.

When I walk along the bike path across PCH from the project site, severe beach erosion is evident. Given that land erosion will continue, recommend that the plan include provision for re-routing PCH inland by 10 or 15 feet to offset the ongoing land erosion. As a city we need to think ahead and anticipate the future; not just wait for problems to occur.

Thank you,
Brian Reilly

From: mark dewey <[redacted]>
Sent: Sunday, February 15, 2026 4:11 PM
To: Cortez, Joanna
Subject: DEiR

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: IMPORTANT

[You don't often get email from [redacted] Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

Ms. Cortez,

I am a 36 year Huntington Beach resident who started surfing here in the mid seventies. I have lived in Seacliff on the Greens for 34 years and have been very involved in civic activities. As a former Board President of my own Community, I was also was the President of the entire 600 homes in the Seacliff Community. I have a deep love of HB, and I shared all of the above to let you know this has caused an uproar throughout this part of town, as I'm sure it will be when the other's understand what you are proposing.

The second paragraph of your letter basically sums up ALL the reasons not to even explore this idea.

*Environmental impact will be devastating i.e between Beach and Wetlands

*Toxicity i.e years of oil, pumps, pipes and air quality to Residents like us who reside right next to the proposed project.

*Noise i.e. this would be a lengthy project with heavy machinery up and down PCH and Seapoint, which in turn will ruin our sense of the privacy and tranquility that we now enjoy.

*Population Density i.e. we are busting at the seams right now as every piece of dirt now is being razed with condos and apartments, with a proposed 800 homes; at 3 people per home brings in an additional 3500 people, not including cars as well.

*Infrastructure i.e. streets, stores, additional civic workers which translates into higher taxes.

When we were having our homeless problems pre pandemic, I asked one of our leaders if they wanted to see change Surf City into other beach cities packed the problems they all have?

What's the real motive here? Are the Residents in our City pushing for more development? Our taxes are the driving force, and how many developers are going to push this proposals with a Propaganda barrage?

Thank you for your time and perusal of or thoughts as proud HB Residents.

Sincerely Yours,

Mark S Dewey
Wendi S Dillard
[redacted]

From: Rob Kerchner <[redacted]>
Sent: Wednesday, February 18, 2026 9:57 AM
To: Cortez, Joanna
Subject: Re: Links to docs?

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: IMPORTANT

You don't often get email from [redacted]. Learn why this is important

Thanks Joanna! I looked over the material and I'm very much in favor of the development! As a Boardwalk resident, I particularly appreciate the wide green belt separating the new development from ours, as well as the pedestrian access to the new commercial area that will be afforded through Pattison Park, and the fact that all the new roads will be privately owned but open to the public. I also love the new green belt along PCH. Well done!

-- Rob Kerchner
[redacted]

On Wed, Feb 18, 2026 at 9:17 AM Cortez, Joanna <Joanna.Cortez@surfcity-hb.org> wrote:

> Good morning,
>
> Thank you for reaching out. I'm sorry that the underscores are hard to see but here is the link for your convenience: https://www.huntingtonbeachca.gov/business_detail_T9_R682.php
>
> Please send any comment prior to the March deadline. Thank you.
>
> Regards,
>
> Joanna Cortez

From: Rob Kerchner <[redacted]>
Sent: Wednesday, February 18, 2026 8:31 AM
To: Cortez, Joanna <Joanna.Cortez@surfcity-hb.org>
Subject: Links to docs?

You don't often get email from [redacted]. Learn why this is important

I cannot seem to get the web address to load in preparation for tonight's meeting regarding development of the 92 acre site abutting PCH. Could you please provide a working link to the NOP, related IS, and other project documents?

From: Jim Veronin <[redacted]>
Sent: Friday, February 20, 2026 1:32 PM
To: Cortez, Joanna
Subject: 92 acre EIR

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: IMPORTANT

You don't often get email from [redacted]. Learn why this is important

Good afternoon Joanna.

I just read an article concerning the 92 acres along PCH which have been slated for improvements.

I am for most improvements the city makes as long as the infrastructure can support the additional load on the surrounding services.

I live locally in Seagate and looking at that plan, the shopping for groceries, gas and other necessary household items would have to come from the Ralph's or Albertson's shopping centers. As a frequent patron of both centers, I feel the area is at the maximum these stores can handle.

If I include gas stations, I feel the same way. I feel the infrastructure is mostly adequate for the current population. Adding additional persons to this area's current infrastructure would reduce our standard of living by a decent amount.

So, with that in mind, where does the city stand and how is this new load being addressed?

Thanks for your time and hoping my thought are not discounted. I cannot be in the majority on this one. Most of us already feel the added load on services from the multiple apartment buildings that have rose up in the past several years.

Thanks for your time!

Jim Veronin
Jim Was Here - [redacted]
[redacted]

From: [redacted]
Sent: Friday, February 20, 2026 9:44 AM
To: Cortez, Joanna
Subject: PCH / CRC Project - Resident thoughts / Seapoint Crosswalk Pedestrian & Bicycles

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: IMPORTANT

You don't often get email from [redacted]. Learn why this is important

Hello,

My family lives in HB, 2 young boys, and lives adjacent to the Wetlands.

We frequently use both the crosswalk and bicycle lane at PCH and Seapoint for beach access.

Regarding the PCH / CRC Project (800 medium density homes / hotel), I hope you "Carefully" plan for safe Crosswalks and address the Beach Staircase at PCH & Seapoint.

Here's a couple of my thoughts to address:

- Beach Access Stair Case at PCH & Seapoint"
    - Dimensions: Currently it's already "Too Narrow / Width" to handle even existing Bicycle, Pedestrian, and E-Bike + Bicycle w/ Surfboard Racks.
    - Blind Spot: When accessing the staircase from (below or above) it's "very difficult" to see who's already going "up or down". This creates bottlenecks, and dangerous situations (families w/ young kids + e-bikes + bikes w/ surfboards + older individuals susceptible to injuries).
    - Entrance to Staircase: When the staircase "backs up", those waiting ending up standing on PCH (impeding potentially cards & road bikers going South PCH in the bicycle lane). This will only get more dangerous with the PCH / CRC Project

- PCH / CRC – Potential Entrance off Seapoint: This should be an "EXIT ONLY" access point, not an entrance to the PCH / CRC development.
    - This is a very bad idea for a number of reasons:
        - 1) Potential Vehicle Collisions (Cars & Pedestrians): If a Vehicle is Turning onto Seapoint from PCH ..... there will be a "Very Short Distance" before they turn

into the PCH / CRC Development. This will create a dangerous situation as "vehicles back-up / vehicles quickly hit the breaks" while barely completing their turn onto Seapoint from PCH both directions. This situation will be Exacerbated as (families cross the street / interaction of Seapoint & PCH / CRC Development, along with bicycles).

- Solutions to the likely dangerous situation:

    1) Make the CRC / PCH Entrance on Seapoint an "Exit Only access point

    2) Pedestrian Bridge over PCH (similar to Hyatt / Twin Dolphin Bridge), which would cost millions of dollars and need a lot of various agency approval

    3) Modify existing PCH / Seapoint – Beach Staircase to handle a much larger flow of (pedestrians, families, bicycles, e-bikes, and bikes w/ surf-racks), and also Ensure a very safe Crosswalk at PCH & Seapoint.

    4) Traffic Light at PCH / Seapoint – Change the setting, and not allow vehicles to just "yield" at the crosswalk …. And instead have a "Red Light" to let people safely cross without looking over their shoulder at approaching vehicles.

Jonathan Kiester
[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Joanna Cortez

Principal Planner- City of Huntington Beach

Community Development Department

2000 Main Street

Huntington Beach, CA 92648

Dear Ms. Cortez,

Huntington Beach has been a leading example to Southern California in providing a high standard of Living for its residents providing outstanding parks, beaches, wetland trails and open spaces. All within A clean, environmentally friendly safe low density setting with fluid traffic flow.

The proposed project at 20101 Golden West is troubling for the following reasons;

- Air quality
- Beach and Wetlands protection
- Energy resources
- Greenhouse gas emissions
- Hazardous material
- Hydrology and water quality
- Housing density increase
- Demand on City Services
- Transportation and traffic flow

Some consideration should be given to the seventeen hundred homes under construction on the Pumpkin Patch land between Seal Beach and Long Beach and how it might effect traffic on Pacific Coast Highway to and from Huntington Beach.

Deir's historically do not represent the concerns of the homeowners but rather empower the City and developer leaving the homeowners to deal with the eventual downside of a project. I hope this Deir will Take into consideration the homeowners concerns.

Cordially,
Ken Weiss



From: [redacted]
Sent: Friday, February 20, 2026 2:15 PM
To: Cortez, Joanna
Subject: Public Comment: Planning for the PCH/C.R.C. Project (Palm/Goldenwest Plan)

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: IMPORTANT

[You don't often get email from [redacted] Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

Dear Ms. Cortez,

I am writing as a local resident to share my concerns about the plan to build on the 92-acre industrial site along Pacific Coast Highway.
As the city starts its Environmental Impact Report (EIR), I ask that you carefully study the following issues:

* Construction Impacts on Neighbors: Building 800 homes and a hotel will take years. I want the report to study how the constant noise, heavy machinery, and dust will affect the health and daily lives of the people who already live in the neighborhoods next to the site.
* Impact on Local Animals: This 1.2-mile stretch of land is home to many birds and other coastal wildlife. I am concerned that the loud construction and the permanent loss of open space will drive these animals away or destroy their habitats. The report should look at how to protect them.
* Cleaning Up the Ground: Since this land was used for oil and gas for a long time, I am worried about pollution in the soil. The city needs to explain how they will dig up this dirt without releasing toxic dust into the air that neighbors and animals breathe.
* Affordable Housing for Workers: With the cost of living in Huntington Beach being so high, I am concerned about the people who will work at the new hotel and facilities. The EIR should address how this project will provide enough truly affordable housing so that the workers can live near their jobs instead of having long, polluting commutes.
* Traffic and Air Pollution: Adding so many new residents and hotel guests will put many more cars on PCH. I want the city to study how this extra traffic will affect air quality and safety for everyone in the area.
* Water and Resources: A project this big will use a lot of water. The report should prove that our city has enough water and infrastructure to support these new buildings without causing problems for current residents.

Thank you for making sure the city looks at how this project affects all forms of life in our community before moving forward.

Best regards,

Tuni Sullivan

From: Isabella Ford
To: Cortez, Joanna
Subject: Palm/Goldenwest Specific Plan concerns
Date: Monday, February 23, 2026 9:51:16 PM

You don't often get email from [redacted] Learn why this is important

Hello Joanna,

As a resident of Huntington Beach since 1995, I'm very concerned about the Palm/Goldenwest Plans calling for residential and commercial development. We have lost so much open space and this is one of the only respites from the chaos within our urban city. Central Park has gained in popularity and with such an active community that defines Huntington Beach, it would be an amazing asset for the city to turn this area into a seaside "Central Park". HB Trees and the numerous Bolsa Chica non-profits have done an fabulous job the past 25 years to rejuvenate the little open space we have. We can now see a Bald Eagle, White Tailed Kites, American Kestrel, Great Horned Owl, Red Shouldered Hawk, and so many more by just walking outside our homes. The Shipley to Shore walk would be greatly enhanced if the walk could include an "urban forest by the sea".

Also, I'm very concerned about the current state of the area. The cliffs are very unstable and has eroded a lot. The beach path has been widened to include a lane for pedestrians and another for bikes or other wheeled items and sand/grass for dogs to do their business but this was only done on the cliffs. It needs to extend past the cliffs to Seapoint and Bolsa Chica State Beach. PCH is frequented by many cyclists but this stretch has vehicles going 50-60 mph yet the road is narrower than Goldenwest. We need to ensure safe throughways for all sorts of traffic - pedestrian, walkers, wheelchairs, pedestrians with dogs, bikes, bikes with trailers, scooters, roller bladers, golf carts, cars and trucks.

If the development has to happen...The park I've seen drawn around the perimeter of this area seems about the same width as the vegetation on north side of Goldenwest south of Palm. This area is too narrow to accommodate the current traffic and developing this area will bring even more traffic. This needs to have bike lanes for the exercising cyclists, bike lanes for the casual cruiser and roller skaters, pedestrians and runners.

Thanks for listening

Isabella Ford
[redacted]

Joanna Cortez
Community Development Department
2000 Main St.
Huntington Beach, CA. 92648

Dear Ms. Cortez,

In response to input requested for the Environmental Impact Report (EIR) Report, I am writing to comment on the scope of development of the property between Goldenwest and Seapoint Streets. Please consider how the proposed development offers an achievable opportunity to enhance our local environment by completing a longstanding green space designation; and to greatly enrich the outdoor experience of those living in and visiting Huntington Beach, well beyond the original cope envisioned.

The Shipley to Shore Trail Connection
For decades, our community has looked forward to seeing the completed Shipley to Shore Trail come to fruition. In the past decade, major strides were made in forestation and landscaping of portions of the trail in Huntington Central Park, thanks to the all-volunteer HB Tree Society and its donors, in partnership with the City of HB. With cooperation and nominal additional funding, the entire trail can be completed and link to the proposed green belt–a huge benefit for the new development's families, hotel guests and others.

The starting point of this 6-mile (roundtrip) trail is the open space at PCH and Seapoint Street – adjacent to the (Palm/Goldenwest Specific Plan Amendment.
Users proceed paralleling the wet side of Seapoint Street, then going behind the Harriett M. Wieder Regional Park to Overlook Park and Drive, then crossing at Edwards Street and Ellis Avenue. The trail winds through the HB Urban Forest, currently the crown jewel of the trail, and continues into the paved portion of Huntington Central Park. Following boulder clusters along the way, the trail ends at the Shipley Nature Center.

Linking the proposed greenbelt to the the Shipley to Shore Trail is a phenomenal opportunity for visiting and residential families. Encounters would include:
- Plants and trees native to the area
- The exquisite HB Urban Forest
- Grazing horses, others on trail rides, and tours of Free Rein rescue ranch
- The popular, newly renovated Huntington Central Park playground
- Shipley Nature Center, engaging visitors on local ecosystems and inspiring future generations to conserve and steward local ecology.

Additional benefits for cooperation on greenbelt/trail connection include:

- Hikers will enjoy a nature trail with ocean views and breezes, and on a clear day for those with good vision, a view of the Hollywood sign!

- Protect the Bolsa Chica Wetlands, meadow and green space with a beautiful walking trail so that surrounding habitat is undisturbed.

- Eradication of invasive plants like the prolific Black Mustard, which chokes out native plants. This will also lead to wildfire fuel reduction once the mustard dies in the hot summer months. Diversity planting with fire-resistant plants could include California Buckwheat (*Eriogonum fasiculatum*), Coast Live Oak trees (*Quercus agrifolila*), Laurel Sumac (*Malosma laurina*), and Lemonade Berry (*Rhus integrifolia*).

- Habitat enhancement will benefit vulnerable species including many pollinating partners, endangered CA Gnatcatchers, Least Bell's Vireo, Coastal Cactus Wren and Burrowing Owls.

- This Environmentally Sensitive Habitat Area (ESHA) is vulnerable to increased wetland pollution, unlawful fires, litter, and criminal activity such as drug use and possession of stolen property. A landscaped trail will help ensure wild land is protected and make local law enforcement patrols easier.

- Resilience in the face of climate change – by adding shade trees and native bushes and plants that contribute to cleaner air by absorbing pollutants.

Solving Trail Blockage and opening access by linking existing trails.
While widely known as the Shipley to Shore Trail, this green space project was originally known as the General Development Plan for Harriett M. Wieder Regional Park, as prepared by Harbors, Beaches and Parks Design Division and updated in 1997 before stalling. The Regional Park is a component of the County's Bolsa Chica Local Coastal Program (BCLCP) certified on July 11, 1996. It was intended to provide trail linkage for hikers, bicyclists and equestrians between Huntington Central Park and Bolsa Chica State Beach.

Property owners along the trail include the City of HB, County of Orange, Bolsa Chica Conservancy and Thomas Oil Drilling. None of these entities object to trail development, but funding has been unavailable, in spite of completion projected to be low cost/high benefit.

Currently, the public doesn't have full access to portions of this coastal trail. A one-acre segment (bluff) along the 6-mile nature trail, owned by the City of HB and the County of Orange, has a pinch-point that requires remediation and development to be safe and accessible to travel. This may be resolved quite easily by installing a metal or concrete plate and possibly a short guard rail to traverse a fall point. It is also possible that the County may be amenable to donating the sliver of land they own, which has been an

upkeep nuisance, to the City of HB. The addition of minimal way-finding signage would also enhance the trail.

A Winning Walk on the Wild Side

Huntington Beach is a unique city in its significant allocation of green space, along with its robust partnerships with local organizations and citizens to maintain and improve these spaces. Protecting, nurturing and optimizing our green spaces have numerous benefits:

- Enhanced mental health for area residents
- Improved physical health of our community members enjoying the green spaces and parkland
- Attraction of visitors to enjoy HB as a destination, improving local commerce as well as visitors' mental and physical health
- Drawing potential home buyers seeking increasingly limited green spaces
- Supporting local wildlife. This includes more breeding habitat for migrating birds in this key portion of the Pacific Flyway Zone.
- Providing youth with a greater appreciation of nature.

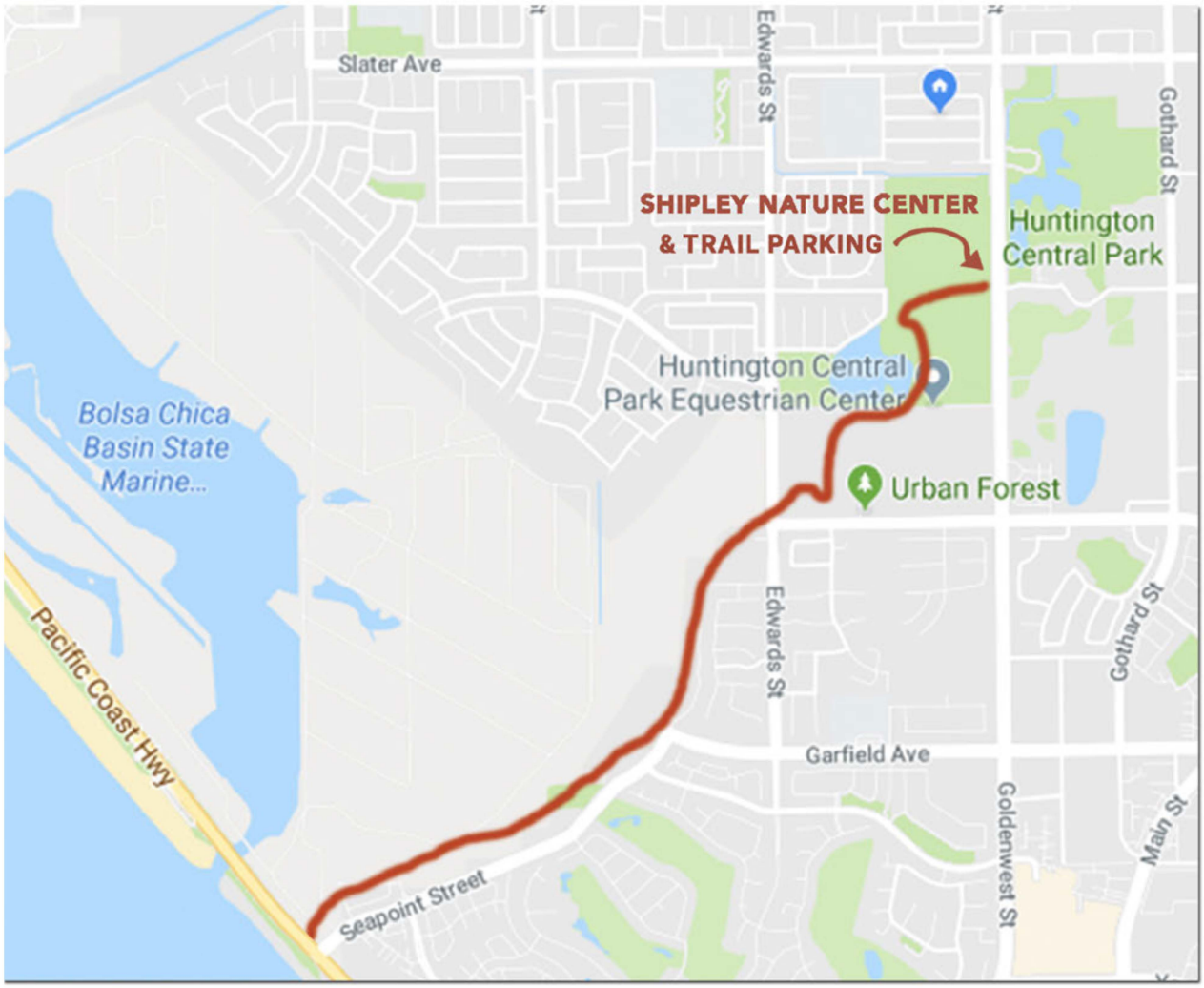
The Huntington Beach Tree Society Board of Directors, Shipley Nature Center representatives and Huntington Central Park Equestrian Center officials are all supportive of the open space development plan for the legacy Shipley to Shore Trail. I urge that the EIR analyze this conservation/open-space project, as linking the trail to the greenbelt would expand green space as well as help mitigate this dense residential/commercial build-out.

If you would like to meet with Huntington Beach Tree Society President Jean Nagy and myself regarding the environmental impact and potential, and the proposal to fulfill the promise for open space, please contact me for arrangements.

Sincerely,

Sheila Holliday
HB Tree Society volunteer & Huntington Beach resident
[redacted]

cc: Matt Szabo, Staff Writer, Los Angeles Times
Jason Schmitt, Huntington Beach City Treasurer


Slater Ave
Edwards St
Gothard St
SHIPLEY NATURE CENTER
& TRAIL PARKING
Huntington
Central Park
Huntington Central
Park Equestrian Center
Bolsa Chica
Basin State
Marine...
Urban Forest
Pacific Coast Hwy
Edwards St
Gothard St
Garfield Ave
Goldenwest St
Main St
Seapoint Street



Portion of trail requiring remediation



G:\Projects\PK00081232_Harriett Wieder Regional Park (Ownership Managed Facilities) Lupe\MXD\Harriett Wieder Regional Park (PK00081232 Ownership) 09-17-2015.mxd

From: Isabella Ford [redacted]
Sent: Monday, March 2, 2026 7:03 AM
To: Cortez, Joanna
Subject: Re: Palm/Goldenwest Specific Plan concerns

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: IMPORTANT

You don't often get email from [redacted]. Learn why this is important

Have there been discussions about widening PCH between Seapoint and Goldenwest? The traffic is bad and seems to bottleneck. Most likely because of the many cars needing to turn left. Adding a second left turn from pch southbound onto Goldenwest would help.

Isabella Ford
[redacted]

On Fri, Feb 27, 2026 at 5:39 PM Cortez, Joanna <Joanna.Cortez@surfcity-hb.org> wrote:

> Thank you for your comment.
>
> Regards,
>
> Joanna Cortez
>
> ---
>
> **From:** Isabella Ford [redacted]
> **Sent:** Monday, February 23, 2026 9:51 PM
> **To:** Cortez, Joanna <Joanna.Cortez@surfcity-hb.org>
> **Subject:** Palm/Goldenwest Specific Plan concerns
>
> You don't often get email from [redacted]. Learn why this is important
>
> Hello Joanna,

As a resident of Huntington Beach since 1995, I'm very concerned about the Palm/Goldenwest Plans calling for residential and commercial development. We have lost so much open space and this is one of the only respites from the chaos within our urban city. Central Park has gained in popularity and with such an active community that defines Huntington Beach, it would be an amazing asset for the city to turn this area into a seaside "Central Park". HB Trees and the numerous Bolsa Chica non-profits have done an fabulous job the past 25 years to rejuvenate the little open space we have. We can now see a Bald Eagle, White Tailed Kites, American Kestrel, Great Horned Owl, Red Shouldered Hawk, and so many more by just walking outside our homes. The Shipley to Shore walk would be greatly enhanced if the walk could include an "urban forest by the sea".

Also, I'm very concerned about the current state of the area. The cliffs are very unstable and has eroded a lot. The beach path has been widened to include a lane for pedestrians and another for bikes or other wheeled items and sand/grass for dogs to do their business but this was only done on the cliffs. It needs to extend past the cliffs to Seapoint and Bolsa Chica State Beach. PCH is frequented by many cyclists but this stretch has vehicles going 50-60 mph yet the road is narrower than Goldenwest. We need to ensure safe throughways for all sorts of traffic - pedestrian, walkers, wheelchairs, pedestrians with dogs, bikes, bikes with trailers, scooters, roller bladers, golf carts, cars and trucks.

If the development has to happen...The park I've seen drawn around the perimeter of this area seems about the same width as the vegetation on north side of Goldenwest south of Palm. This area is too narrow to accommodate the current traffic and developing this area will bring even more traffic. This needs to have bike lanes for the exercising cyclists, bike lanes for the casual cruiser and roller skaters, pedestrians and runners.

Thanks for listening

Isabella Ford

[redacted]

From: Andrei <[redacted]>
Sent: Monday, March 2, 2026 2:15 PM
To: Cortez, Joanna
Subject: 92 acre Palm/Goldenwest project address 20101 Goldenwest Street HB.

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: IMPORTANT

You don't often get email from [redacted]. Learn why this is important

Hello Joanna,
We would like to submit comments about the proposed 92 acre project at 20101 Goldenwest St.
We are the original owners of the property at [redacted] (Mystic Pointe HOA). We have been living here since it was built in 2004 and our property is facing directly to the new proposed project.
Some suggestions we would like to propose based on our life experience here:
1. There is a lot of dust, sand and high winds that we have experienced throughout the years. Because of that factor it would be nice if future developers employ some dust and noise reduction measures during the construction and ground preparation, such as watering the grounds and noise absorbing temporary walls
2. It would be very attractive to install a 75 feet geen buffer zone/park with a pedestrian path along the Boardwalk and the Mystic Pointe HOA fence to mitigate the traffic noise.
3. Proposed 350 room hotel and 800 residential unit community will require direct access to our beautiful beach. It would be very desirable to build an over PCH bridge to allow people safely access the beach without impeding traffic.
4. Direct access from existing Pattinson park to new community and hotel.
5. We are assuming that all electricity supply lines and transformers will be underground and nicely incorporated into the future of the new community.
Thanks

Andrei Soumzine
Margarita Burk
[redacted]

From: Cortez, Joanna
Sent: Thursday, March 5, 2026 3:07 PM
To: 'Perez, Paola@Wildlife'
Cc: Turner, Jennifer@Wildlife
Subject: RE: Request for Extension- Palm/Goldenwest Specific Plan Amendment Project NOP Comments

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: IMPORTANT

Good afternoon,

Thank you for you reaching out. The City of Huntington Beach will grant CDFW an extension of time as requested in the email below. Please provide all comments by 5:00 pm on Monday, March 23, 2026. Should there be an opportunity to provide comments earlier than the 23rd, we would appreciate it. Please let me know if you have any questions. Thank you.

Joanna Cortez

Principal Planner

Community Development

Office: (714) 374 - 1547

joanna.cortez@surfcity-hb.org

2000 Main Street

Huntington Beach, CA 92648

HB ACA – Apply Online or Check Status: HB ACA
Surf City Inspections Request App: APPLE ANDROID FLYER
How was your experience? Survey

From: Perez, Paola@Wildlife <Paola.Perez@Wildlife.ca.gov>
Sent: Wednesday, March 4, 2026 12:29 PM
To: Cortez, Joanna <Joanna.Cortez@surfcity-hb.org>
Cc: Turner, Jennifer@Wildlife <Jennifer.Turner@wildlife.ca.gov>
Subject: Request for Extension- Palm/Goldenwest Specific Plan Amendment Project NOP Comments

Hello Joanna Cortez,

I hope this email finds you well. I am writing on behalf of the California Department of Fish and Wildlife (CDFW) to request an extension to the deadline for submitting comments on the Palm/Goldenwest Specific Plan Amendment Project Notice of Preparation (NOP). While comments are currently due on March 9, we kindly request an extension to allow submission of our comments by close of business on March 23.

An extension would provide additional time to complete a thorough internal review and coordination to ensure our comments are comprehensive and constructive.

Thank you very much for your consideration of this request. Please let me know if you need any additional information.

Respectfully,

Paola Perez (She/Her)
California Department of Fish and Wildlife
South Coast Region
3883 Ruffin Road, San Diego, CA 92123
Paola.Perez@wildlife.ca.gov
Work Cell: (858) 354 - 2413

From: Jani Mae Den Herder <[redacted]>
Sent: Wednesday, March 4, 2026 9:23 PM
To: Cortez, Joanna
Subject: Palm/Golden California Resources redevelopment project

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: IMPORTANT

[You don't often get email from[redacted] Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

Traffic/ street parking off Palm
As you can see all the spaces the current neighborhood in front of Pattinson Park, all non red crub and into the cul-de-sacs off Palm
Please include this into your traffic study







PUBLIC SCOPING MEETING
PALM/GOLDENWEST SPECIFIC PLAN AMENDMENT PROJECT EIR
FEBRUARY 18, 2026, 6:30 PM

NAME: JANI MAE

ADDRESS: [redacted] CITY: H.B ZIP: 92648

EMAIL ADDRESS: [redacted]

REPRESENTING:

Do you wish to be added to the project mailing list? ☒ YES ☐ NO

Please drop comments in the Comment Box or mail them to:

City of Huntington Beach
Community Development Department
Joanna Cortez, Principal Planner
2000 Main Street
Huntington Beach, CA 92648
Phone: 714-374-1547
E-mail: joanna.cortez@surfcity-hb.org

The purpose of this comment card is to solicit input regarding the scope and content of the Environmental Impact Report (EIR). Please submit comments for the record that pertain to the *environmental issues* to be addressed in the EIR (please print).

ISSUE:- TRAFFIC - SAFETY

ADDING An Additional - 800 homes could Mean 2,400 - more cars -

ADDING Hotel RMS & even more CARS -

The Traffic on the corner of Golden West AND PCH is busy - But more important in the summer it is OVER Flowed of people Trying/uniting to cross over PCH - its crazy crowded - PEOPLE WALKING From 15th Street Thru 2nd to WALK their dogs -

Concern is Safety - Currently they Already - over take the sidewalk - waiting -

Maybe do A Red light Flashing - And widen the Area where pedistrians wait to cross.

PUBLIC SCOPING MEETING
PALM/GOLDENWEST SPECIFIC PLAN AMENDMENT PROJECT EIR
FEBRUARY 18, 2026, 6:30 PM

NAME: JANI MAE

ADDRESS: [redacted] CITY: H.B ZIP: 92648

EMAIL ADDRESS: [redacted]

REPRESENTING: _____

Do you wish to be added to the project mailing list? ☒ YES ☐ NO

Please drop comments in the Comment Box or mail them to:

City of Huntington Beach
Community Development Department
Joanna Cortez, Principal Planner
2000 Main Street
Huntington Beach, CA 92648
Phone: 714-374-1547
E-mail: joanna.cortez@surfcity-hb.org

The purpose of this comment card is to solicit input regarding the scope and content of the Environmental Impact Report (EIR). Please submit comments for the record that pertain to the ***environmental issues*** to be addressed in the EIR (please print).

ISSUE: Air quality - control

question - Are you going to build large - walls Adjacent The current evidence suggest - potential bad impact on health - due to exposure to dust From oil substance ground. Inked to cancer, liver damage, Auto immune, Neurological disorders espeically to children and older Aldults -

I'm concerned about Toxins in the Air - since Air OFF the ocean blows directly into my neighbor - Adjencent behind SAID project. 75% on the time.

THE Air STudy is Critical; Exploring The Full range of heath concerns.

SOUTHERN CALIFORNIA
ASSOCIATION OF GOVERNMENTS
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017
T: (213) 236-1800
www.scag.ca.gov

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March 5, 2026

Joanna Cortez, Principal Planner
City of Huntington Beach, Community Development Department
200 Main Street
Huntington Beach, CA 92648
E-mail: Joanna.Cortez@surfcity-hb.org

Subject: SCAG Staff Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Palm/Goldenwest Specific Plan Amendment Project [SCAG NO. IGR11284]

Dear Joanna Cortez:

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the Palm/Goldenwest Specific Plan Amendment Project ("proposed project") to the Southern California Association of Governments (SCAG) for review. SCAG is responsible for providing informational resources to regionally significant plans, projects, and programs per the California Environmental Quality Act (CEQA) to facilitate the consistency of these projects with SCAG's adopted regional plans, to be determined by the lead agencies.[1]

Pursuant to Senate Bill (SB) 375, SCAG is the designated Regional Transportation Planning Agency under state law and is responsible for preparation of the Regional Transportation Plan (RTP), including the Sustainable Communities Strategy (SCS). SCAG's feedback is intended to assist local jurisdictions and project proponents to implement projects that have the potential to contribute to attainment of and alignment with adopted Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) goals and policies. Finally, SCAG is the authorized regional agency for Intergovernmental Review (IGR) of programs proposed for Federal financial assistance and direct Federal development activities, pursuant to Presidential Executive Order 12372.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the Palm/Goldenwest Specific Plan Amendment Project in the City of Huntington Beach. The proposed project includes demolition of existing oil and gas production infrastructure, and construction of up to 800 residential units, 350 hotel rooms, open space, and parks on 92 acres.

When available, please email environmental documentation to IGR@scag.ca.gov providing, at a minimum, the full public comment period for review.

If you have any questions regarding the attached SCAG staff comments, please contact the IGR Program, attn.: Ryan Bañuelos, Senior Regional Planner, at (213) 630-1532 or IGR@scag.ca.gov. Thank you.

Sincerely,

Lijin Sun

Lijin Sun
Planning Supervisor, Planning Strategy Department

[1] Local jurisdictions and other lead agencies shall have the sole discretion to determine a local project's or plan's consistency and/or alignment with Connect SoCal 2024 for the purpose of determining consistency for CEQA purposes.

SCAG STAFF COMMENTS ON THE NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PALM/GOLDENWEST SPECIFIC PLAN AMENDMENT PROJECT [SCAG NO. IGR11284]

CONNECT SOCAL 2024

Connect SoCal 2024 (Plan) is a long-range visioning plan for the six-county SCAG region, reflecting a continuation of the shift towards more efficient resource management including transportation infrastructure resources, land resources and environmental resources. The Plan highlights the existing land use and transportation conditions throughout the SCAG region and forecasts the region's evolving transportation needs between 2024 and 2050. The Plan identifies and prioritizes expenditures of the anticipated funding for transportation projects of all transportation modes: highways, streets and roads, transit, rail, bicycle, and pedestrian, as well as aviation ground access.

The Plan was developed to achieve greenhouse gas (GHG) per capita emission reduction targets, consistent with Senate Bill (SB) 375 and other regional goals. In accordance with federal fiscal constraint requirements, Connect SoCal 2024 is a financially constrained Plan in terms of transportation revenues and expenditures. Connect SoCal 2024 would reduce traffic congestion, improve air quality, and improve the region's long-term economic viability through more than $751 billion in transportation investments and a more sustainable regional development pattern. To view Connect SoCal 2024 and the accompanying technical reports, please visit the Connect SoCal 2024 webpage.

Connect SoCal 2024 Vision and Goals

The SCAG Regional Council fully adopted the Plan on April 4, 2024. Connect SoCal 2024 represents the vision for the region and reflects the planned transportation investments, policies, and strategies that integrate with the Forecasted Regional Development Pattern to achieve the Plan's goals. The Vision and Goals for Connect SoCal 2024 are rooted in the direction set forth by Connect SoCal 2020, reflecting both SCAG's statutory requirements, the emerging trends, and persistent challenges facing the region. Reflecting input from engagement with stakeholders and members of the public, SCAG's vision for Southern California in the year 2050 is "*A healthy, prosperous, accessible and connected region for a more resilient and equitable future."* The following goals and subgoals helps the SCAG region to achieve this vision.

Mobility: ***Build and maintain an integrated multimodal transportation network***

- Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions
- Ensure that reliable, accessible, affordable and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities
- Support planning for people of all ages, abilities and backgrounds

Communities: ***Develop, connect and sustain communities that are livable and thriving***

- Create human-centered communities in urban, suburban and rural settings to increase mobility options and reduce travel distances
- Produce and preserve diverse housing types in an effort to improve affordability, accessibility and opportunities for all households

Environment: ***Create a healthy region for the people of today and tomorrow***

- Develop communities that are resilient and can mitigate, adapt to and respond to chronic and acute stresses and disruptions, such as climate change
- Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water
- Conserve the region's resources

Economy: ***Support a sustainable, efficient and productive regional economic environment that provides opportunities for all residents***

- Improve access to jobs and educational resources
- Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities

For ease of review, SCAG staff encourages the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency, or non-applicability of the goals and supportive analysis in a table format. Suggested format is as follows:

SCAG CONNECT SOCAL 2024 GOALS AND SUBGOALS		
	Goal/Subgoal	Analysis
Mobility Goal:	*Build and maintain an integrated multimodal transportation network*	*Consistent: Statement as to why; Not-Consistent: Statement as to why; or Not Applicable: Statement as to why; DEIR page number reference*
Mobility Subgoal:	*Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions*	*Consistent: Statement as to why; Not-Consistent: Statement as to why; or Not Applicable: Statement as to why; DEIR page number reference*
etc.		etc.

Connect SoCal 2024 Key Elements

Unique to this plan cycle, SCAG developed a set of Regional Planning Policies and Implementation Strategies to guide decision-making in the region toward integrated land use and transportation planning and other goals in Connect SoCal 2024. Eighty-eight Regional Planning Policies provide guidance for integrating land use and transportation planning to realize the vision of Connect SoCal 2024. The Implementation Strategies help the region to achieve this vision for the future and are priorities for SCAG efforts in fulfilling or going beyond the Regional Planning Policies. The Regional Planning Policies and Implementation Strategies were developed to achieve California's greenhouse gas emission reduction goals as set forth in SB 375 and federal Clean Air Act Section 176(c) requirements for transportation conformity while meeting the broader regional objectives, such as improved equity and resilience in addition to preservation of natural lands, improvement of public health, increased roadway safety, support for the region's vital goods movement industries and more efficient use of resources. The Plan also includes a detailed project list; strategic investments to bridge local plans with overarching regional performance targets and goals; a growth forecast and regional development pattern based on population, household and employment growth projections by 2050; and a transportation network including a list of transportation projects and investments.

Connect SoCal 2024 presents a summary of that work in five chapters of the Main Plan with additional details on Plan elements and analysis in the Plan's accompanying 15 Technical Reports, including the Housing Technical Report. Connect SoCal 2024 builds upon the progress from previous RTP/SCS cycles, reflecting both SCAG's statutory requirements, the emerging trends, and persistent challenges facing the region. These policies offer a resource by which County Transportation Commissions (CTCs) or local jurisdictions within the SCAG region, when seeking resources from state or federal programs, can refer to specific policies to demonstrate alignment with the RTP/SCS.

Regional Growth Forecast and Forecasted Regional Development Pattern

As part of developing a Sustainable Communities Strategy per SB 375, SCAG must include a "forecasted development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies …" enables SCAG to reach its per capita GHG emission reduction target of 19 percent below 2005 levels by 2035. SCAG staff prepared a Forecasted Regional Development Pattern for Connect SoCal 2024 through 2050, the horizon year of the Plan. The regional growth forecast determines the projected increase in population, households, and jobs based on local general plans and known development entitlement agreements, including available data from 6th cycle housing element updates. The Connect SoCal 2024 Demographic and Growth Forecast Technical Report includes detailed discussions on socioeconomic data, including additional detail on the growth forecast, growth vision, and Sustainable Communities Strategy (SCS) consistency in Section of the Technical Report. The Connect SoCal 2024 Land Use and Communities Technical Report includes the most recent planning assumptions and estimates of population and housing.

SCAG's work helps facilitate implementation, but SCAG does not directly implement or construct projects or have land use authority. Achieving a sustained regional outcome depends upon informed and intentional local action. To access jurisdictional level growth estimates and forecasts for years 2035 and 2050, please refer to the Final Connect SoCal 2024 growth forecast data. The growth forecasts for the region and the applicable jurisdiction is below.

	Adopted SCAG Region Growth Forecasts				City of Huntington Beach Growth Forecasts		
	Year 2019	**Year 2030**	**Year 2035**	**Year 2050**	**Year 2019**	**Year 2035**	**Year 2050**
Population	18,827,000	19,476,000	19,946,000	20,909,000	199,400	192,900	197,200
Households	6,193,000	7,006,000	7,311,000	7,814,000	78,800	81,400	83,300
Employment	8,976,000	9,609,000	9,885,000	10,276,000	85,300	87,300	87,800

Consistency with Connect SoCal 2024

SCAG provides informational resources to facilitate the lead agency's consistency determination of the proposed project with Connect SoCal 2024. For the purpose of determining consistency with CEQA, local jurisdictions shall have the sole discretion to determine a local project's or plan's consistency and/or alignment with Connect SoCal 2024[2].

CEQA MITIGATION MEASURES

The SCAG Regional Council certified the Final Program Environmental Impact Report for Connect SoCal 2024 (2024 PEIR) and adopted the Mitigation Monitoring and Reporting Program (MMRP), Findings of Fact, and a Statement of Overriding Considerations on April 4, 2024. The mitigation approach used in the 2024 PEIR recognizes the limits of SCAG's authority; distinguishes between SCAG commitments and project-level responsibilities and authorities; optimizes flexibility for project implementation; and facilitates CEQA streamlining (e.g., SB 375) and tiering where appropriate on a project-by project basis determined by each lead agency. Consistent with the approach, the 2024 PEIR identifies regional-level mitigation measures to be implemented by SCAG over the lifetime of the Plan as well as project-level mitigation measures that lead agencies can and should consider, as applicable and feasible, in subsequent project-specific design, CEQA review, and decision-making processes. Given that SCAG is not an implementing agency and has no decision-making authority over projects or any land use authority, it is ultimately up to each lead agency's own discretion to determine the appropriateness of mitigation measures, including exploring opportunities of voluntary regional advance mitigation programs, based on project-specific circumstances such as individual site conditions, project specific details, and community values. Therefore, SCAG staff recommends that the proposed project's CEQA lead agency review the 2024 PEIR for guidance, as appropriate.

[2] SCAG. April 2024. Connect SoCal 2024 Demographic and Growth Forecast Technical Report. Accessible at: https://scag.ca.gov/sites/main/files/file-attachments/23-2987-tr-demographics-growth-forecast-final-040424.pdf

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL: March 5, 2026

Joanna.Cortez@surfcity-hb.org
Joanna Cortez, Principal Planner
Department of Community Development
City of Huntington Beach
2000 Main Street,
Huntington Beach, CA 92648

Notice of Preparation of a Draft Environmental Impact Report for the Palm/Goldenwest Specific Plan Amendment Project (Proposed Project) (SCH#: 2026020245)

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send a copy of the Draft EIR upon its completion and public release directly to South Coast AQMD as copies of the Draft EIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses (electronic versions of all emission calculation spreadsheets, air quality modeling, and health risk assessment input and output files, not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

Responsible Agency and South Coast AQMD Permits

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits. The Proposed Project site currently has multiple permitted facilities, including an oil and natural gas production facility operated by So Cal Holding, LLC (South Coast AQMD Facility ID No. 169754) located at 20101 Goldenwest Street in Huntington Beach, California. These facilities are expected to be removed as part of the Palm/Goldenwest Specific Plan Amendment Project development.

For these reasons, the Draft EIR should be revised to include a discussion about any and all new stationary and portable equipment (including the vapor recovery system and other cleanup equipment) that may require South Coast AQMD air permits, provide the evaluation of their air

quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at https://www.aqmd.gov/home/permits.

CEQA Air Quality Analysis

The Lead Agency is recommended to rely on the guidance provided in the South Coast AQMD's CEQA Air Quality Handbook and website[1] when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the California Air Pollution Control Officers Association's California Emissions Estimator Model (CalEEMod)[2] software, to quantify emissions of air pollutants from typical land use development project.

In addition, the South Coast AQMD has adopted regional air quality significance thresholds[3] as well as localized significance thresholds (LST).[4] If the Lead Agency has not adopted its own significance thresholds, the Lead Agency is recommended to rely on South Coast AQMD's adopted thresholds for determining whether the Proposed Project's air quality and greenhouse gas impacts are significant. It is important to note that the localized analysis can be conducted by either using the LST screening tables or performing air dispersion modeling.

The Lead Agency should identify any potential adverse air quality and greenhouse gas impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality and greenhouse gas impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality and greenhouse gas impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality and greenhouse gas impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, if the Lead Agency elects to rely on South Coast AQMD's air quality significance thresholds, the emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's air quality significance thresholds for *operation* to determine the level of significance.

Given the site's long history of oil and gas production activities, soils and potentially groundwater may contain petroleum hydrocarbons, volatile organic compounds (VOCs), semi-volatile organic

[1] South Coast AQMD's CEQA Air Quality Handbook and other resources for preparing air quality analyses can be found at: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook.

[2] CalEEMod is available free of charge at: www.caleemod.com.

[3] South Coast AQMD's air quality significance thresholds can be found at: https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf

[4] South Coast AQMD's guidance for performing a localized air quality analysis can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds.

compounds (SVOCs), heavy metals, and other oilfield-related contaminants. Because the proposed redevelopment includes residential, commercial, and recreational uses, cleanup standards must be protective of sensitive receptors, including future residents, construction workers, and park users.

Due to the potential presence of VOCs in soil, the Lead Agency and responsible agencies, including DTSC should ensure that remediation activities comply with the requirements of South Coast Air Quality Management District Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil, including notification and preparation of a soil mitigation plan, if required, prior to soil disturbance. The EIR should also address compliance with South Coast AQMD Rule 403 (Fugitive Dust) and evaluate the applicability of South Coast AQMD Rule 1466 (Control of Particulate Emissions from Soils with Toxic Air Contaminants), including any required monitoring or mitigation measures.

Health Risk Reduction Strategies

Many strategies are available to reduce exposures, including, but are not limited to, building filtration systems with MERV 13 or better, or in some cases, MERV 15 or better is recommended; building design, orientation, location; vegetation barriers or landscaping screening, etc. Enhanced filtration units are capable of reducing exposures. However, enhanced filtration systems have limitations. For example, in a study that South Coast AQMD conducted to investigate filters,[5] a cost burden is expected to be within the range of $120 to $240 per year to replace each filter panel. The initial start-up cost could substantially increase if an HVAC system needs to be installed and if standalone filter units are required. Installation costs may vary and include costs for conducting site assessments and obtaining permits and approvals before filters can be installed. Other costs may include filter life monitoring, annual maintenance, and training for conducting maintenance and reporting. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy consumption that the Lead Agency should evaluate in the Draft EIR. It is typically assumed that the filters operate 100 percent of the time while residents are indoors, and the environmental analysis does not generally account for the times when the residents have their windows or doors open or are in common space areas of the project. These filters have no ability to filter out any toxic gases. Furthermore, when used filters are replaced, replacement has the potential to result in emissions from the transportation of used filters at disposal sites and generate solid waste that the Lead Agency should evaluate in the Draft EIR. Therefore, the presumed effectiveness and feasibility of any filtration units should be carefully evaluated in more detail prior to assuming that they will sufficiently alleviate exposures to diesel particulate matter emissions.

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at sghadimi@aqmd.gov.

Sincerely,

Sam Wang

[5] This study evaluated filters rated MERV 13 or better. Accessed at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf. Also see 2012 Peer Review Journal article by South Coast AQMD: https://onlinelibrary.wiley.com/doi/10.1111/ina.12013.

Program Supervisor, CEQA IGR
Planning, Rule Development & Implementation

SW:SG
ORC260210-01
Control Number

CALIFORNIA COASTAL COMMISSION
South Coast Area Office
301 E Ocean Blvd, Suite 300
Long Beach, CA 90802
(562) 590-5071

March 6, 2026

Joanna Cortez, Principal Planner
City of Huntington Beach, Community Development Department
2000 Main Street
Huntington Beach, CA 92648

Delivered via electronic mail: Joanna.Cortez@surfcity-hb.org

Re: Palm/Goldenwest Specific Plan (PGSP) Amendment Project
Coastal Commission Staff Comments on the Draft PGSP and the Notice of Preparation of a Draft EIR
State Clearinghouse No. 2026020245

Dear Ms. Cortez,

Coastal Commission staff appreciate the opportunity to review and comment on the draft Palm/Goldenwest Specific Plan (PGSP) and the Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for the PGSP Amendment Project. Given the impacts of the project on land use, water quality/marine resources, Tribal Cultural Resources, and public access, additional and more thorough project review will be required as part of any future Local Coastal Program (LCP) Amendment for the proposed project.

The following comments address, in a preliminary manner, the issue of the project's consistency with the Chapter 3 policies of the California Coastal Act of 1976, which is the standard of review for an amendment to the Land Use Plan (LUP) portion of the LCP, and the certified LUP, which is the standard of review for an amendment to the Implementation Plan (IP) portion of the LCP. This letter is an overview of the main issues Commission staff has identified at this time and requests for analysis to be provided in the EIR, or clarification provided to Commission staff, based on the information that has been presented, and it is not an exhaustive analysis.

The proposed project involves an LCP Amendment (LCPA) to modify the existing PGSP and land use and development standards for the subject site. The LCPA would facilitate the future redevelopment of the 92-acre project site, including the demolition and removal of existing oil and gas production infrastructure and the future construction of up to 800 residential units, up to 350 hotel rooms or other permitted visitor-serving uses, and various open space and park areas. Future buildout of the site would include new vehicular access points and internal circulation roadways, informational signage, utility and infrastructure connections, and multi-use paths. Under the proposed PGSP Amendment, the project site would be divided into three planning areas: Planning Area 1 (16 acres of Commercial Visitor uses), Planning Area 2 (53.2 acres of Medium Density Residential uses, which would be subdivided into Planning Areas 2A [30.8 acres] and 2B [22.4 acres]), and Planning Area 3 (22.8 acres of open space/park uses, which would be subdivided into Planning Area 3A [19.7 acres] and 3B [3.1 acres]).

The following are Commission staff's specific comments on the current project, broken down by resource:

Land Use: Section 30213 of the Coastal Act states that lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Additionally, Section 30222 states that the use of private lands suitable for visitor-serving commercial recreational facilities shall have priority over private residential uses. Coastal Element Policy C.1.1.3 echoes Coastal Act Section 30222. The proposed project would change the designated land use of the project site from solely visitor-serving to visitor serving, residential, and open space uses. More specifically, the LCP amendment would change the visitor serving land use across the 92-acre property to 16 acres of commercial visitor land use, 53.2 acres of residential medium land use, and 22.8 acres of open space/park land use. Given its close proximity to the beach, the subject site is well suited for lower cost recreation and visitor-serving uses. Lower cost recreation and/or visitor-serving uses are a priority use in the Coastal Act as they offer an opportunity for the public to recreate along and have access to the coast. However, residential uses are not a priority use and do not offer the same beneficial uses that lower cost recreation and visitor-serving uses do. Lower cost visitor-serving uses, as well as open space area, must be maximized and protected on site since they are priority uses as stated in the Coastal Act. Our staff understands that residential uses are currently allowed within the commercial visitor-serving land use designation. However, our concern is that the proposed redesignation of approximately 53.2 acres to residential would significantly reduce the potential for visitor-serving uses, as those uses are not permitted within the RM designation. Thus, we recommend that the EIR consider project alternatives that maximize visitor-serving commercial uses on the subject site. As part of the LCP amendment, please provide an analysis showing that the land uses proposed are consistent with the land use priorities outlined in the Coastal Act.

Public Access: Sections 30210 through 30214, Sections 30220 through 30224, and 30252 of the Coastal Act state that proposed development must not have any new adverse impact on public access to the coast or to nearby recreational facilities.

> **Coastal Access Parking:** The PGSP currently proposes approximately 60–100 off-street public parking spaces along Pacific Coast Highway (PCH) near Seapoint Street. To ensure consistency with the Coastal Act's mandate to maximize public access and recreational opportunities, we recommend that the City analyze alternatives that include additional off-street public parking along PCH. Increasing the availability of convenient parking is critical to reducing barriers for visitors seeking coastal access. Additionally, Commission staff recommend incorporating clear, visible signage for these off-street parking areas to indicate that they are intended for beach and coastal access. Providing such signage is essential to effectively communicate the availability of these spaces to the public, thereby supporting the Coastal Act's goal of enhancing access to the shoreline.

Parking Rates: Please include in the PGSP detailed information on the proposed parking rates for public parking within the project area, along with a comprehensive rate structure that explains how these rates are expected to change over time. This information is important for evaluating affordability and ensuring that parking remains accessible to the public in accordance with Coastal Act policies.

Transit Passes: Coastal Element Policy C.2.3.6 requires that new development—such as multi-unit housing and commercial centers—maintain and enhance public access to the coast by providing measures that encourage public transportation use. The proposed LCP amendment specifies that all hotel employees will receive free Orange County Transit Authority (OCTA) transit passes, along with other incentives to promote non-automobile commuting and carpooling. However, the amendment does not extend this benefit to employees of all visitor-serving uses onsite. Please analyze the feasibility of requiring these incentives for all visitor-serving employees to ensure consistency with the policy's intent and to further reduce automobile dependence.

Public Access Signage: The public access policies found in the Coastal Act and in the city's certified LCP emphasize the importance of enhancing public access to the maximum extent feasible. In recent Commission actions, this has been executed by providing coastal access signage in multiple languages in order to expand opportunities for residents and visitors whose first language is not English to access the coast. Thus, we recommend that all public access signage should include signs, at a minimum, in English and Spanish, as well as Vietnamese, which is commonly spoken in the area, in order to enhance accessibility for all visitors of the coast.

Subdivisions: Please describe any public access easements or dedications that will be proposed for the public green space surrounding the residential subdivisions.

Lower Cost Visitor Accommodations (LCVAs): If there are hotels or coastal visitor serving uses proposed onsite, the Certificate of Occupancy for the visitor serving uses should be issued prior to any certificate of occupancies issued for the residential development.

Tribal Cultural Resources: The project site may contain sensitive Tribal Cultural Resources, which are considered significant coastal resources under the Coastal Act. The PGSP requires that any Coastal Development Permit (CDP) application for ground-disturbing development include a Phase I investigation, including ground penetrating radar and soil test pits if necessary, and a detailed written Cultural Treatment Plan. The Phase I investigation and the Cultural Treatment Resource plan should be developed in consultation with affected Native American Tribes. Soil test pits require a CDP. To ensure consistency with the Coastal Act, the Specific Plan must reflect that a CDP for ground disturbance including grading and site preparation is necessary. The Cultural Treatment

Plan must be reviewed and approved by the City prior to the CDP for grading and ground disturbance being scheduled for Planning Commission consideration.

Affordable Housing: The PGSP includes a provision that preference for renting an affordable housing unit will be given to residents or workers in the City, veterans, and individuals age 55 or older. Commission staff is concerned that these criteria, as drafted, could unintentionally limit affordable housing opportunities for other low-income households who do not fall within these specified groups but who also face significant barriers to living near, or accessing, the coast. Ensuring that affordable units are broadly available to low-income households is a core objective of the Coastal Act's provisions related to coastal access and supporting equitable housing opportunities.
To better align with these coastal access goals, Commission staff recommends that any preference system prioritize individuals employed in the on-site hotel, retail, and service-oriented uses created by the project. These workers are likely to be lower-wage earners who would substantially benefit from proximity to their workplaces and who traditionally experience some of the highest barriers to securing coastal-area housing. Incorporating this group into the preference structure can advance both the City's housing objectives and the Coastal Act mandate to expand access for underserved populations, while still allowing the City to maintain preferences for veterans and older adults.

Water Quality/Marine Resources: The Coastal Act contains policies that protect marine resources and water quality. For example, Section 30230 of the Coastal Act states that marine resources shall be protected, while Section 30231 of the Coastal Act states that biological productivity and quality of coastal waters shall be maintained. The City's LUP has many policies that echo these Coastal Act policies.

> **Turf:** As part of the proposed LCPA, the updated PGSP includes provisions for an esplanade surrounding the parcel. Current details indicate the potential use of turf within this area. However, the use of artificial turf—particularly plastic-based products or those incorporating tire crumb rubber infill—raises significant environmental concerns. Artificial turf, as a plastic-based alternative to natural grass, poses issues related to plastic degradation, offsite transport of microplastics, and increased pressure on already saturated plastic waste streams. Unlike other sources of microplastic pollution, artificial turf fibers are subject to harsh weathering conditions, including frequent mechanical abrasion and prolonged UV exposure. When installed adjacent to coastal waterways, these fibers can migrate offsite, making coastal and nearshore waters a likely temporary reservoir for artificial turf debris. Further, artificial turf containing tire crumb rubber introduces additional risks. Numerous studies have documented that hazardous chemicals present in tire particles can leach into soil and water, off-gas into the atmosphere, and disperse as dust and particulate matter. These chemicals have been shown to cause acute and chronic toxicity in aquatic organisms, with significant adverse effects on survival, reproduction, and growth.
>
> Given these concerns, please clarify the type of turf permitted under the Specific Plan. Additionally, provide an assessment of potential water quality impacts

associated with the selected material and evaluate the feasibility of alternative materials that minimize or avoid impacts to water quality and marine resources.

Single Use Plastics: The proposed LCPA anticipates future restaurant uses on the site. Restaurants are often significant sources of single-use plastics, including plastic to-go containers, utensils, and expanded polystyrene (Styrofoam) foodware. In this location, such items pose a direct risk of polluting the beach and adjacent waters. Plastic pollution is a persistent and escalating threat to the health of California's oceans and coastal ecosystems. To address this, the PGSP should incorporate clear criteria aimed at reducing waste and limiting single-use items—specifically litter, plastic foodware, expanded polystyrene containers, and packaging.

Additional Comments:

Phasing: Please include a table in the PGSP that outlines the phasing for future development on site and key milestones and technical requirements that need to be met prior to permits issued for subdivisions, grading, residential construction, commercial construction, etc.

Future use of Planning Area 3B: The draft PGSP currently states that no open space or park improvements are planned for Planning Area 3B because the parcel provides southern vehicular access to oil and gas operations in the Bolsa Chica lowlands from Seapoint Street. However, the long-term need for this access is uncertain. Please evaluate the feasibility of converting Planning Area 3B into public park use in the future if oil wells are decommissioned and the site is no longer required for oil field access.

Consistency Analysis: Please provide an analysis of the adequacy of the PGSP, as amended, to conform with and carry out the policies of the certified LUP and the Chapter 3 policies of the Coastal Act.

Please note that the comments provided herein are preliminary in nature. More specific comments may be appropriate as the project develops. Coastal Commission staff request notification of any future activity associated with this project or related projects. Additionally, the comments contained herein are those of Coastal Commission staff only and should not be construed as representing the opinion of the Coastal Commission itself. Thank you again for the opportunity to comment on the draft PGSP and the NOP of a Draft EIR. We look forward to future collaboration on preservation of coastal resources within the South Coast region. If you have any questions or concerns, please do not hesitate to contact us at the Coastal Commission's Long Beach office.

Sincerely,



Emily Greer
Coastal Program Analyst

cc:
Jennifer Villasenor, City of Huntington Beach
Amrita Spencer, California Coastal Commission
Amber Dobson, California Coastal Commission

From: Judith Hulsey <judy@huntingtonwest.com>
Sent: Friday, March 6, 2026 10:31 AM
To: Cortez, Joanna
Cc: Mierau Chad; Peter Georgatsos; Urquhart Laura; Jason; BURKET PAMELA; David Hulsey
Subject: BCA- Public Scoping Meeting Palm/ Goldenwest Specific Plan Amendment Project EIR Comment Card
Attachments: Palm - Goldenwest Specific Plan EIR Public Comment Period 2-26 to 3-9-2026 FINAL.docx

Importance: High

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

Categories: IMPORTANT

You don't often get email from judy@huntingtonwest.com. Learn why this is important

March 6th, 2026

Dear Joanna Cortez, Principal Planner,
City of Huntington Beach
Community Development Department
2000 Main Street
Huntington Beach, CA 92648
Email: Joanna.cortez@surfcity-hb.org

On behalf of the Boardwalk Community Association, I would like to share that many residents of our neighborhood attended your Palm/ Goldenwest Specific Plan Amendment Project Notice of Preparation (NOP) and Public Scoping Meeting on Feb. 18, 2026, and/ or read through your Palm/ Goldenwest Specific Plan Amendment, including the Initial Studies. As stated in your letter, the Boardwalk Association would like you to please include the below questions and concerns from the Boardwalk Community as part of the 30-day Public review period. We have attached a letter with as our comments based on the request from the city to solicit input regarding the scope and content of the EIR.

You will see in the letter that we have separated our comments into 2 sections below, regarding the Initial Study and the scope and content of the EIR based on the CEQA Environmental Checklist.

Thank you for your time and consideration as the Principal Planner, and we look forward to hearing the City of HB council's response (and any others involved), in the planning prior to approving this project. Thank you for reaching out to our bordering community to collect input on one of the most significant land use transformations in this area's history.

Regards,

The Boardwalk Community Association
The Boardwalk HOA Board
Comment Collection: Chad Mierau, Vice President

Boardwalk Community Association
Huntington West Properties, Inc Management
13812 Goldenwest Street #100
Westminster, CA 92683

February 28, 2026

Dear Joanna Cortez, Principal Planner,
City of Huntington Beach
Community Development Department
2000 Main Street
Huntington Beach, CA 92648
Email: Joanna.cortez@surfcity-hb.org

On behalf of the Boardwalk Community Association, I would like to share that many residents of our neighborhood attended your Palm/ Goldenwest Specific Plan Amendment Project Notice of Preparation (NOP) and Public Scoping Meeting on Feb. 18, 2026, and/ or read through your Palm/ Goldenwest Specific Plan Amendment, including the Initial Studies. As stated in your letter, the Boardwalk Association would like you to please include the below questions and concerns from the Boardwalk Community as part of the 30-day Public review period. We have separated our comments into 2 sections below, regarding the scope and content of the EIR.

The Palm/Goldenwest Specific Plan Amendment related Initial Study (IS), listed on the website: https://www.huntingtonbeachca.gov/business_detail_T9_R682.php, states this project represents one of the most significant land use transformations in this area's history.

After the notice for comment went out, it was clear that many members of the community had concerns of this large project proposal. Both as HB citizens using the surrounding beaches and parks, as parents of young kids growing up in the same public services and recreation service space, but most specifically, as Boardwalk members bordering this project, we have concerns about the proposal to change a Visitor Serving Commercial project into one adding High to Medium Density Residential units of 800 units and over 2000 new residents, to be added to a smaller Commercial Visitor hotel component that brings added elements. According to your initial report, this Specific Plan could lead to hazardous conditions, an environmental impact to the surrounding coastal areas, heavy traffic, neighborhood intrusion, noise, spillover lighting, aesthetic conflicts, and overuse of the current shared public services and recreation parks without a proposal for new mixed use parks for these families, so we also added a new park proposal, as the proposal only offers a multi-use path when one already exists across the street. The Boardwalk community is left to compare very little benefit in adding a Residential plan on PCH, when a Visitor Serving Commercial plan could benefit the high traffic area.

For many of the reasons listed in your Initial Study, the Boardwalk community would like to provide input regarding the scope of this (EIR) Environmental Impact Report, and ask that the EIR proposal be comprehensive, transparent, and protective of the existing residents.

We have broken the comments/ questions to follow the Initial Study reports between some of the (1) Initial Study findings that affect the Boardwalk community and (2) the environmental impact factors checklist that would have potentially have a significant impact on our adjacent neighborhood as listed alphabetically in the CEQA cumulative impact checklist.

Part I: Initial Study Cumulative Impacts (Required Under CEQA)

The EIR must evaluate impacts cumulatively with other approved or pending developments in Huntington Beach and along PCH. The project cannot be evaluated in isolation; how will you address this as a combined proposal?

Required analysis includes:

- Combined traffic and intersection degradation
- Regional air quality impacts
- Cumulative groundwater extraction impacts
- School crowding
- Parkland-to-resident ratio
- Emergency response times under cumulative congestion

Initial Study Sections:

2.3.1.2 Medium Density Residential

1. Formal Demand for "Clustered Density & View Corridor" Alternative

We formally request that the Lead Agency evaluate a **"Northern Concentration Alternative"** as a means of impact avoidance.

- **The Proposal:** Utilize California Density Bonus Law (**Gov. Code § 65915**) to transfer the units currently proposed for the southern 30.8-acre zone into the northern 22.4-acre zone.
- **The Impact:** By increasing height or density in the northern section, the southern portion adjacent to Beachview Drive can be redesignated as **Low-Intensity Open Space** or **Single-Story Recreational Facilities**.
- **The Legal Basis:** Under CEQA, the agency is mandated to evaluate alternatives that "avoid or substantially lessen any of the significant effects of the project." Total view blockage for an entire residential street constitutes a significant aesthetic impact that must be analyzed.

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2. Requirement for a "Step-Down Transition" Mitigation Measure

To ensure neighborhood compatibility and consistency with the adjacent Boardwalk's 26-foot height limit, we propose the following enforceable mitigation measures:

- **Height Cap:** A **26-foot maximum height** for any structure within a 200-foot buffer of the Beachview Drive property line.
- **Roofline Consistency:** Requirement for **pitched roofs** (matching the Boardwalk character) rather than flat roofs, which create a "visual wall" effect and increase perceived massing.
- **Linear Greenbelt Buffer:** Repurpose the planned 23 acres of parkland into a **75-foot wide greenbelt buffer** directly adjacent to Beachview Drive. This would provide a necessary setback and push new construction further from existing property lines.

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3. Mandatory Aesthetic & Economic Studies

To properly quantify the impact on the human environment, we request the following studies be conducted and included in the draft EIR:

Study Requested	Purpose	Legal Trigger
3D Viewshed Analysis	Must use "Key Observation Points" (KOPs) from the second-story balconies of the 12 Beachview homes.	CEQA Aesthetic Impacts
Shading/Shadow Study	To determine if 35-foot structures will block winter sunlight from existing solar panels or living areas.	CA Solar Rights Act
Compatibility Analysis	Comparing the proposed Medium Density (RM) against existing low-density "Boardwalk" character.	General Plan Consistency

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4. Repurposing the Planning Area 2A (Southern Zone)

As a specific project refinement, we propose that the area immediately adjacent to existing residential properties be utilized for the project's **Public Amenities** rather than residential units.

- **The Proposal:** Relocate the project's open space, greenbelt**, clubhouse, tennis courts, and swimming pools** to the southern zone / Goldenwest(Planning Area 2A).
- **The Benefit:** These facilities are typically single-story or open-air. This allows the developer to meet their recreational space requirements while preserving the "blue water" horizon line for existing residents.



2.3.8 Construction

5. Requirement for methane vapor and hydrogen sulfide monitoring

What methane vapor and hydrogen sulfide (H_2S) monitoring has been conducted at the site boundaries adjacent to the Boardwalk Community? Given documented incidents at comparable California oil-field redevelopments (Marina del Rey 2019 blowout, Echo Park 2018 leak). We are **proposing a real-time air quality monitoring plan** to be required during the well-abandonment and construction phases, prior to approving the specific plan.

6. Formal Demand for a “protect in place” standard during demolition

How will you confirm that all the demolition and digging of all existing development within all 3 planning areas, will be “protected in place?” This project was fully developed with industrial (Oil and gas production) land uses, oil wells, above ground tanks, above ground and underground pipelines, oil separation and related facilities, a gas plant and gas flare unit, power substations and office facilities, and residents of the boardwalk are **requesting a proposal to protect against the hazardous materials exposure during construction.**

7. Request for sharing the well-mapping methodology and survey

The EIR must identify the exact number, location, depth, and current condition of all oil and gas wells on the 92-acre site. Given that CalGEM records for legacy wells are frequently incomplete, we request sharing the independent third-party well-mapping methodology survey be publicly released **before** the Draft EIR is published?

2.3.3 Access, Circulation, and Parking

8. Formal demand for the complete traffic model methodology

The NOP states projected Average Daily Trips (ADT) will decrease from 21,909 to under 9,000, a 60% reduction claim that is difficult to reconcile with the addition of 800 residential units, 350 hotel rooms, and commercial uses. Please provide the complete traffic model methodology, including: (a) the trip-generation rates used per unit type; (b) the assumed occupancy rates for hotel rooms; (c) the Vehicle Miles Traveled (VMT) analysis required under SB 743; and (d) the peak-hour analysis for Goldenwest Street, Pacific Coast Highway, and Seapoint Street during both construction and post-occupancy phases.

9. Request for the spillback analysis during peak traffic scenarios

The Boardwalk Community currently accesses PCH and Goldenwest Street via limited ingress/egress points. With the proposed 3 new PCH entrances plus secondary entrances on Seapoint and Goldenwest, what is the **projected queuing and spillback analysis** for these intersections during school hours, peak beach season, and emergency evacuation scenarios? What roadway improvements will be funded entirely by CRC, not city taxpayers?

2.3.1.3 Open Space/ Park

1. Change proposal for 19.7 acres of a multi-use path to mixed use park

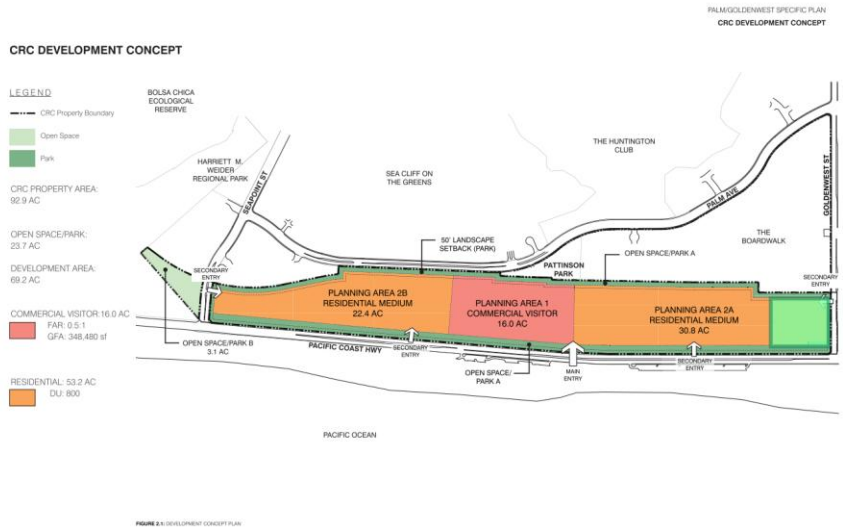
In the current planning document, the only proposed park is a multi-use path with benches, picnic areas, and shade structures. A multi-use path already exists across PCH, and runs the length of the city. It becomes very clear that with 800 proposed units and over 2000 new residents, many of the youth that will move to the area will not have parks large enough to play sports in. The only proposal is to use Pattinson Park, which has maximal use currently with the existing residents, see images of no open space proposed for mixed use fields.



Image of Pattinson Park to resident ratio vs Proposal of multi-use path only for 800 units.

2. Change proposal for 19.7 acres of a multi-use path to mixed use park

We see an open area on Planning Area 3B, but as stated, no development is proposed for Planning Area 3B. In combination to **the Proposal** to relocate the project's open space and **greenbelt, clubhouse, tennis courts, and swimming pools** to the area immediately adjacent to Beachview Drive. We would like to propose moving the 19.7acres from Plan areas 1 & 2 into open park space on the southern zone of the project, in Planning Area 2, with mixed use fields. As it stands, the fields in HB are already full with youth sports, this would help with the addition of 2000+ new residents, so their children can practice with league and youth activities, ie soccer fields, baseball, basketball.



Scenario Proposal for a **new park area with youth sport fields** would offer much more than the multi-use path that duplicates the path across the street. In addition, this would be a nice continuation of Bluff Top park and the new Patriot Point.



Part II. - Environmental Factors Potentially Affected

There are 17 environmental factors checked that would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" indicated by the checklist in Section 4.0.

4.0 CEQA Environmental Checklist – Questions from each impact analysis:

Cumulative Impacts (Required Under CEQA)

The EIR must evaluate impacts cumulatively with other approved or pending developments in Huntington Beach and along PCH.

Required analysis includes:

- Combined traffic and intersection degradation
- Regional air quality impacts
- Cumulative groundwater extraction impacts
- School crowding
- Parkland-to-resident ratio
- Emergency response times under cumulative congestion

The project cannot be evaluated in isolation; how will you address this as a combined proposal?

Environmental Factors – The report acknowledges substantial adverse effect on a scenic vista and will *substantially degrade* the existing visual character or quality of public views of the site and its' surroundings. What is the proposed mitigation as this Specific Plan highlights many areas it differs from the City Standards?

4.1 AESTHETICS – Public Resources Code **Section 210099,**

☒ **Initial Study recognizes a Potentially Significant Impact:** Would this project have a substantial adverse effect on a scenic vista? "This project may alter the existing viewshed and may impact public views of the Pacific Ocean."

☒ **A Potentially Significant Impact:** Would this project substantially degrade the existing visual character or quality of public views of the site and its surroundings?

This project represents a fundamental change to neighborhood character, for Aesthetics, Height & Privacy.

The EIR must include:

- Height-limit analysis along property boundaries
- Privacy and line-of-sight evaluation
- Shade and shadow analysis on existing homes and rooftop solar systems
- Light pollution and glare study
- Hotel "night glow" mitigation measures against spillover light depending on type, proximity, and intensity that could interfere with vision, sleep, and privacy.
- Would this project potentially conflict with applicable zoning and other regulations governing scenic quality as currently proposed?
- The Notice of Preparation states the EIR will address "view corridors." Will the visual impact analysis include 3-D photo simulations and sight-line modeling specifically from Beachview Drive and other Boardwalk Community homes currently enjoying ocean views? If not, why not?
- How will you meet the City's General Plan Coastal Element to include policies to protect visual resources and mitigate or remove facilities and sites that negatively impact the visual character of the area and not detract from existing visual resources?
- California Coastal Act §30251 requires new development to be "visually compatible with the character of surrounding areas." How does CRC define the "character of surrounding areas" given that the Boardwalk Community consists of single-family homes with established ocean-view corridors. What design alternatives were considered to preserve these corridors?
- Can the units along the Goldenwest corridor match the aesthetics, height limits, privacy, spacing for view corridors, and character of the surrounding Sea Cliff area?

The Boardwalk HOA would like to see the proposed EIR plan for addressing the above, and share the proposal with us, so we can partner on planning before moving forward.

4.3 AIR QUALITY –

☒ **Initial Study recognizes a Potentially Significant Impact:** Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

The EIR must include a full Health Risk Assessment (HRA) analyzing:

- Diesel particulate matter exposure
- Multi-year construction emissions
- Cumulative PM2.5 and NOx exposure
- Impacts to children and elderly residents
- Greenhouse gas emissions and VMT consistency with state climate goals

How will the proposed project contain or "protect in place," any significant short-term and long-term air quality impacts associated with the excavation, future development, and vehicular traffic?

The Boardwalk HOA residents would like to see the proposed EIR plan for addressing the above, and share the proposal with us, so we can partner on planning before moving forward.

4.4 BIOLOGICAL RESOURCES –

☒ **Initial Study recognizes a Less Than Significant Impact**: Would the project have a substantial adverse effect, either directly or through habitat modification's, on any species identified as a candidate, sensitive or special species in local or regional plans, policies or regulations by the CA Dept of Fish and Wildlife.

How will you address the potential impact to the movement of any native wildlife species as specified in your report for the following?

- Burrowing Owl survey
- Migratory bird impacts
- Habitat mitigation requirements
- Substantial adverse effects on protected wetlands, marsh, and coastal interruption

The Boardwalk HOA residents would like to see the proposed EIR plan for addressing the any substantial adverse effects on protected wetlands and coastal interruption.

4.5 CULTURAL RESOURCES –

☒ **Initial Study recognizes a Potentially Significant Impact:** Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

☒ **A Potentially Significant Impact:** Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

- How does the removal of a development over 50 years of age impact potential cultural findings?
- Is there a proactive engagement with listed Cultural Groups from the area, to weigh in on the new project proposal based on the findings from the studies?

The Boardwalk HOA residents would like to see the proposed EIR plan for addressing the above, and share the proposal with us, so we can partner on planning before moving forward.

4.6 ENERGY

- We just want to make sure there are no new electrical facilities, boxes, or lines that are located in close proximity to adjacent backyards or views in the Boardwalk.

4.7 GEOLOGY and SOILS -

☒ **Initial Study recognizes a Potentially Significant Impact:** Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

How will your plan address decades of oil extraction raise serious subsurface stability concerns?

The EIR must include:

- Subsidence analysis
- Liquefaction risk mapping
- Soil settlement impacts on adjacent foundations
- Structural risk to nearby pools and hardscape
- Fault proximity study
- Developer-funded pre-construction condition surveys of adjacent homes

We are concerned about the above, and would like to see the proposals for addressing the impact to adjacent foundations, structural risk to pools or hardscape, and sharing any pre-construction condition surveys of adjacent homes? Can you share the proposal with us so we can partner on planning before moving forward?

4.8 GREENHOUSE GAS EMISSIONS -

☒ **Initial Study recognizes a Potentially Significant Impact:** Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

- How will the proposed plan address the concern for the greenhouse gas emissions and energy used for construction equipment, vehicle trips during long-term impact from 800 new homes and 350 new hotel rooms?

4.9 HAZARDOUS MATERIALS, CONTAMINATION & LONG TERM HEALTH RISK

☒ **Initial Study recognizes a Potentially Significant Impact:** Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

☒ **A Potentially Significant Impact:** Would the project create a significant hazard to the public or the environment through the reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

☒ **A Potentially Significant Impact:** Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Given the site's decades-long operation as an oil and gas production complex, this issue is foundational. How are you planning on addressing the concern for hazardous materials that will be exposed from a fully developed industrial oil and gas production facility, which includes oil wells, ground tanks, above and underground pipelines, a gas plant and gas flare unit, power substations, and oil separation facilities?

<u>The EIR must include:</u>

- A comprehensive remediation plan identifying residual hydrocarbons, VOCs, benzene, PAHs, and heavy metals
- Independent third-party peer review of all contamination studies
- A vapor intrusion study evaluating potential migration into adjacent homes once soils are disturbed
- Mapping and verification of all abandoned wells
- Long-term methane migration monitoring
- Explosion hazard analysis and gas mitigation design standards
- A funded, enforceable long-term monitoring program
- A financial assurance bond to cover remediation failures or homeowner damages
- Continuous real-time air monitoring during soil disturbance with public reporting
- Strict dust control protocols to prevent contaminated "oil field dust" from entering neighboring yards

The EIR must analyze worst-case exposure scenarios, especially given prevailing onshore sea breezes that move air directly toward existing residences. How will you confirm that all the demolition and digging of all existing development within all 3 planning areas, will be "protected in place" and not create a significant hazard to the public or the environment?

The Boardwalk HOA would like to see the proposed EIR plan for addressing the above, and share the proposal with us, so we can partner on planning before moving forward.

4.10 HYDROLOGY and WATER QUALITY

☒ **Initial Study recognizes a Potentially Significant Impact:** Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

☒ **A Potentially Significant Impact:** Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site;
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;
iii. Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows?

Converting 92 acres to dense development significantly increases impermeable surface area, how do you plan to meet city standards and address the potential significant impact?

<u>The EIR must document Hydrology, Flooding & Infrastructure Capacity:</u>

- Storm water runoff modeling under 10-, 25-, and 100-year storm events
- Flooding impacts to lower-lying adjacent properties
- Long-term maintenance responsibility for drainage systems
- A “Will Serve” analysis for water and sewer capacity
- Fire flow and water pressure analysis

<u>Document Coastal & Climate Resilience:</u>

- Sea-level rise modeling (30 – 50 year horizon)
- Coastal evacuation modeling
- Salt-air corrosion impacts on infrastructure

The Boardwalk HOA would like to see the proposed EIR plan for addressing the above, and share the proposal with us, so we can partner on planning before moving forward.

4.11 LAND USE/ PLANNING

☒ **Initial Study recognizes a Potentially Significant Impact:** Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

The EIR should address Property Value and Zoning Precedent:

- Impacts to adjacent property values
- Consistency with the Palm/Goldenwest Specific Plan
- Spot zoning implication
- The Impact of losing Commercial/Office/Visitor Serving, Open Space/Civic and Visitor Serving Commercial land uses on Coast Hwy, to a High or Medium Density Residential designation up to 800 units to the surrounding community?

The Boardwalk HOA would like to see the proposed EIR plan for addressing the above, and share the proposal with us, so we can partner on planning before moving forward.

4.12 MINERAL RESOURCES

With the elimination of active oil and gas extraction, will their be an impact on the beaches, ie. more tar or oil slicks impacting the Coastal space surrounding this property?

4.13 NOISE and VIBRATION

☒ **Initial Study recognizes a Potentially Significant Impact:** Would the project result in 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?

☒ **A Potentially Significant Impact:** Would the project result in Generation of excessive groundborne vibration or groundborne noise levels?

The EIR must evaluate:

- Pile driving and soil compaction vibration impacts
- Potential structural damage to adjacent homes
- 24/7 operational noise from hotel HVAC systems
- Loading dock activity

- Increased human activity in what is currently a quiet buffer

Mitigation measures must be enforceable and measurable. The Boardwalk HOA would like to see the proposed EIR plan for addressing the above, and share the proposal with us, so we can partner on planning before moving forward.

4.14 POPULATION and HOUSING

☒ **Initial Study recognizes a Potentially Significant Impact:** Would the project Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extensive of roads or order infrastructure)?

Park & Open Space Clarity

The proposed 23 acres of open space must specify:

- Public space vs. HOA control
- Maintenance funding source
- Open space ratio of usable parkland vs residents
- The only proposed mixed use park for the new 800 home residents was an existing Pattinson park, and a multi use path. Any proposal for a new mixed use park for the youth sports that families of 800 homes will required beyond existing parks.
- Interview the youth sports leagues for open space ratio with AYSO, FNL, Leinart Football, Little League Baseball, etc. with a shortage on field space.
- Lighting hours
- Event programming limits

Alternative Analysis (CEQA)

The EIR must evaluate feasible alternatives including:

- Reduced-density alternative
- Height-reduction alternative
- Increased buffer alternative
- Commercial-only alternative consistent with current zoning
- Phased development alternative

Mitigation through reduced density must be meaningfully analyzed, not dismissed. We ask that you share your Alternative Analysis plan for the above alternatives.

Construction Duration & Quality of Life

Given the potential multi-year buildout, how will you mitigate for all the:

- Phased construction timeline
- Work-hour restrictions
- Construction worker parking controls
- Night lighting impacts
- Staging area locations near adjacent neighborhoods

The Boardwalk HOA would like to see the proposed EIR plan for addressing the above, and share the proposal with us, so we can partner on planning before moving forward.

4.15 PUBLIC SERVICES

☒ **Initial Study recognizes a Potentially Significant Impact:** Would the project result in substantial physical impacts associated with the provision of new or physically altered governmental facilities? For Fire Protection, Police Protection, Schools, Parks, Other Public facilities.

The EIR should assess:

- Police response time impacts
- Crime projections based on comparable mixed-use developments
- Transient population impacts from the hotel
- Security lighting spillover
- Precautions considered for impact on cellular/ internet service in the current area

School Capacity should consider:

- Enrollment projections
- Classroom availability
- Drop-off congestion impacts

Parks:

- Open space ratio of usable parkland vs residents
- Proposal for a multi-use path doesn't allow for mixed use sports park, and the need for a Regional sized park with field space.
- There is already a multi-use path across PCH, from Newport Beach to Sunset Beach.
- A proposal for utilizing already saturated park space, such as Pattison Park or Harriett M Weider do not offer youth sports space needed for the proposed 2,024 new residents coming from the population plan, is not sufficient.
- We request a proposal for a mixed use park with multiple sports fields for the use by youth sports' leagues in Huntington Beach, due to the saturation of current fields.

The Boardwalk HOA would like to see the proposed EIR plan for addressing the above, and share the proposal with us, so we can partner on planning before moving forward.

4.16 RECREATION

☒ **Less Significant with Mitigation Incorporation:** Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would by accelerated? Or require the construction or expansion of recreational facilities which might have an adverse effect?

The EIR must Evaluate:

- Interview HB chapters of youth sport organizations, such as AYSO, Little League, FNL and Leinart Football, etc for availability of park space before proposing a multi-use path as the only park space.
- Confirm the preservation of the Huntington Dog Beach, and that the stretch of dog-friendly beach will not be removed, or space taken for "private hotel beach access?"
- Additionally, re-review why a mufti-use path was proposed over a mixed field park, as there is already a multi-use path across PCH that spans all of Huntington's coast?
- Can private recreational facilities associated with individual residential development on the project site (providing more than 20 dwelling units could include a clubhouse, swimming pool, tennis court, volleyball court, outdoor cooking facility, or other recreation facility, as required under Chapter 210, Section 210.07 of the HBZSO), be proposed on the Goldenwest side of the project, where most of the activity occurs and could be a continuation of Bluff Top park.

The Boardwalk HOA would like to see the proposed EIR plan for addressing the above, and share the proposal with us, so we can partner on planning before moving forward.

4.17 TRANSPORTATION

☒ **Potentially Significant Impact:** Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

☒ **Potentially Significant Impact:** Would the project conflict or be inconsistent with CEQA Guidelines 15064.3, subdivision (b)?

The addition of up to 800 residential units and 350 hotel rooms will generate thousands of daily vehicle trips.

The EIR must analyze Traffic, Emergency Access, & Neighborhood Intrusion:

- Intersection Level of Service (Goldenwest/PCH and Seapoint/PCH)
- Peak summer beach-season congestion
- Neighborhood cut-through traffic modeling
- Construction truck routing and pavement damage responsibility
- Emergency vehicle delay modeling
- Coastal evacuation capacity under peak occupancy

The Boardwalk HOA would like to see the proposed EIR plan for addressing the above, and share the proposal with us, so we can partner on planning before moving forward.

4.18 TRIBAL CULTURAL RESOURCES

☒ **Potentially Significant Impact:** Cause a substantial adverse change in the significance of a tribal cultural resource, defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe?

- Are there a proactive engagement with listed Cultural Groups from the NAHC, to weigh in on the new project proposal based on the findings from the studies?

The Boardwalk HOA residents would like to see the proposed EIR plan for community outreach to the Tribal communities for potential impact on project planning.

4.20 WILDFIRE

The EIR must analyze the Heat Island Effect:

- Surface temperature modeling
- Tree canopy requirements
- Impact on adjacent backyard livability

In summary, you can see that as the bordering community that will be living here during this proposed change, we have multiple concerns about the Palm/ Goldenwest Specific Plan Initial Study, CEQA Checklist, and the many topics identified as “potentially significant impact.” For that reason, we would like the planning commission to consider our concerns, and allow us to be part of the planning based on our proposed alternatives, to ensure this proposed development doesn’t drastically change our community as CRC transitions out of the area.

Thank you for your time and consideration in this matter, and we look forward to your response.

Regards,

The Boardwalk HOA Board and Members

Issues for CRC land development

1) Construction Planning

a) Building Height and density

i) Building height should not exceed the height of neighboring residential communities
ii) Landscaping should not exceed building height.
iii) Roof top decks should not be allowed. This is consistent with adjacent community architecture. Roof top facilities are unattractive features and provide an invasion of privacy into adjacent community homes.
iv) Building density should be consistent with equivalent adjacent communities.

b) Setback for fence line, walkways and building

i) The Seapoint St sidewalks should be maintained as they now exist. They are 8 feet wide (including curb). The south side of Seapoint St is the main pathway to the beach with the only crosswalk at PCH and then steps down to the beach bike path. It gets a considerable amount of pedestrian and bike traffic. It also serves as the crossing point for the people arriving or taking the south bound PCH bus with bus stop directly at the crosswalk mentioned above.
ii) The existing Seapoint St fence line of the subject land should be maintained. It is a continuation and in-line with the adjacent Surfcrest Community fence line. Any setbacks for new community construction (streets, sidewalks, public landscaping and structures) should be determined from this fence line.
iii) The landscaping (ground cover, trees and watering system) adjacent to the subject development fence line and sidewalk should be retained. It is a continuation of the adjacent Surfcrest Community, street landscaping.

c) **Seapoint St Entrance (automobile & pedestrian**)

i) At the February 18, 2026 meeting at the Huntington Beach City Hall, the Seapoint entrance was explained as a right turn only, for turn in and turn out. If so;
   (1) The Seapoint St medium, which is now open, should be closed with a continuation of the medium design and landscaping. If left open, drivers will ignore the right turn only requirement. Right now, the open mediums in this area have 'NO U-turn' signs which are frequently ignored.
   (2) Anticipate that the open median at the Surfcrest Community main entrance will become a dangerous illegal U-turn site for drivers to get back to PCH when exiting the new community at this proposed entrance.
   (3) A significant 'turn in' area, greater than a simple mark lane, should be specified for this entrance to avoid the blockage from cars turning into this entrance. Blockage will occur for the following.
      (a) Pedestrian traffic along this entrance location which is the primary path to and from the beach and North bound PCH bus stop (numerous domestic help coming and going into the Sea Cliff communities daily).
      (b) Bicycle and E-bikes use this side of the Seapoint St as well, using both the sidewalk and bike path often in an unlawful opposite direct to travel flow. (With the speed of E-bikes, this creates a dangerous surprise for drivers turning right when exiting.)

(c) High volume of vehicle traffic going to and returning from work, with speeds often well exceeding speed limits now being experienced on this Seapoint St coming from the PCH intersection.

(4) Current beach goers often use the oil field's very deep and spacious driveways (approximate location of the planned new entrance) for:
   (a) Vehicle stops to drop off people and beach equipment.
   (b) Occasional parking for short-term beach assess.
   (c) These situations must be prohibited with a new entrance sized for smaller vehicles and not oil truck, tankers and oversized machinery occasionally passing each other while simultaneously exiting and entering.

(5) Vehicles often stop along the curb on Seapoint St between PCH and the Oil Field entrance to off load beach goers. This will cause another blockage to the new entrance turn in. This practice will need to be closely watched and eliminated.

ii) **A traffic study should be done to investigate this design.** With the other entrances to the property a significant distance away, this entrance will likely become a main entrance for vehicles. A small street like Seapoint was not designed to handle the additional traffic at peak morning and evening travel times.

iii) If a Seapoint St entrance is approved, **it should NOT include a traffic signal**. Approximately 200 feet from the signal at PCH, it would cause additional traffic backups. It would also project unwanted, intense light into adjacent community bedrooms and living area windows which are within 100 feet of this proposed entrance.

2) During Construction

a) Oil field ground clean up

i) All requirements for eliminating the adverse effects from ground clean-up should be applied. Smell and chemical exposure (airborne or by contact) must be contained and simply not allowed.

b) Construction Dust and dirt

i) Constant watering down and sweeping of roads is a must but with the daily ocean winds, that will not stop dirt from getting everywhere in the Surfcrest Community which is only a few hundred feet from construction. A 40 to 60-foot wind blind at the junction of our properties might help but will not eliminate the problem and seems unlikely to be added by the developer. Any ideas would be welcome.

c) Construction Noise

i) Noise is another difficult issue. What are the noise level limits that can be imposed? Measurements need to be taken often to show compliance. Would hate to tell existing adjacent residents to keep their windows closed for months or years on end.

ii) Noise coming from workers/construction traffic arriving and leaving must be contained within the allowable work hours.

d) **Security during construction**.

i) Construction sites are an invitation for criminals. Criminals will not stop at only the construction site but will be drawn to any adjacent attractive area to rob. Since the development is responsible for attracting the crime, the development should be responsible for securing 24-hour security for the construction site and our adjacent properties.

ii) Lighting is a good deterrent, but **no lighting should be pointed up into the windows** of adjacent homes.

e) Pest Control

i) Any construction which disturbs the physical ground will cause pests (primarily mice, rats, squirrels, ants, spiders and other insects) to vacate to adjacent areas. Even before construction begins, Pest Control must be put in place. (This is a Surfcrest Community experience gained with swarms of rodents and insects during the Ocean Colony community construction.)

f) Unsuitable building components

i) Require copper or stainless-steel roof metal components to eliminate an eye sore to immediately neighboring communities of corroding metal due to proximity to ocean. Our Surfcrest community experienced loss of all steel, galvanized steel and aluminum material needing replacement starting only 4 years after construction, then followed with total loss of all such roof material … None remains on our roofs. We also got to watch the Ocean Colony roof metal quickly rust and corrode and be replaced.

3) Open Space/Park and Seapoint St Perimeter (between street and property fencing)

a) Landscaping (trees, shrubs, ground cover, irrigation, sidewalks, lighting, hard attractions)

i) Planting varieties should be carefully planned for ocean environment.

ii) Trees should be evergreen, not have invasive roots structures and be limited to a mature height of no greater than 20 feet.

iii) Lighting **should not** be provided by tall lighting fixtures that can shine into adjacent community homes. Lighting should be provided by **low height pathway** only fixtures.

b) Sidewalks

i) Sidewalks (including curb) along Seapoint St should **remain at 8 foot wide**.

ii) Sidewalks along the open space green belt would ideally be at least 6 feet wide which would provide a more relaxed atmosphere when several people are passing each other.

c) Maintenance responsibility

i) The New Community must be responsibility for maintaining all landscaping and sidewalks described above.

Submitted by
The Sizlos
[redacted]

From: Tom Telly
To: Cortez, Joanna
Cc: "Teri Kittredge"; Tom Telly; Tom Telly
Subject: Palm/Goldenwest Specific Plan Amendment
Date: Saturday, March 7, 2026 8:11:20 PM

> You don't often get email from [redacted]. Learn why this is important

Joanna,

I hope you enjoyed your weekend.

My name is Tom Telly and I live [redacted] facing the development site. I am leaving on a business trip and wanted to get you some quick comments on concerns I have about the Palm/Goldenwest Development Plan.

1. Health Concerns
    a. Noise pollution
    b. Lights keeping us up at night
    c. Air quality issues
    d. Vibration from cleanup/construction
    e. Toxic dust during cleanup/construction coming into our home and settling vents

2. Wildlife Concerns
    a. Impact on Bolsa Chica State Wildlife Preserve from noise, lights, air quality, vibrations...
    b. Wildlife that nests (eagles, hawks, owls ...)in our neighborhood within Seacliff on the Greens

3. Homeowner Value
    1. Impact on home values based on all the above

I believe that this is a major undertaking and will negatively impact the Seacliff Community and the wildlife in this area.

I appreciate you keeping the HB community informed of the progress or non-progress of this plan.

Thank you for your time and attention.

TT

Tom Telly, RPh.
[redacted]

[redacted]

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From: Manal Tadros [redacted]
Sent: Saturday, March 7, 2026 3:23 PM
To: Cortez, Joanna
Cc: supplementalcomm@surfcity-hb.org
Subject: Public Comment: Palm/Goldenwest Specific Plan Amendment (20101 Goldenwest Street)

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: IMPORTANT

You don't often get email from [redacted]. Learn why this is important

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To: Joanna Cortez, Principal Planner
Email: Joanna.Cortez@surfcity-hb.org
Cc: Huntington Beach City Council Supplemental Communication, SupplementalComm@surfcity-hb.org
Date: 7 March 2026
Subject: Public Comment: Palm/Goldenwest Specific Plan Amendment (20101 Goldenwest Street)

Dear Ms. Cortez,

I am writing as a resident of the Seacliff neighborhood in Huntington Beach, residing at [redacted], which is approximately 500 feet from the property line of the Aera Energy site, to provide formal comments regarding the Notice of Preparation (NOP) for the Environmental Impact Report (EIR) for the **Palm/Goldenwest Specific Plan Amendment**.

Based on the review of the Notice of Preparation (NOP) and Initial Study (IS) released on February 6, 2026, I request that the following potentially significant environmental and community impacts be thoroughly analyzed in the forthcoming Draft EIR:

Aesthetics and Visual Resources: The EIR must evaluate how up to 800 residential units and 350 hotel rooms will affect scenic vistas and existing ocean view corridors along the 1.2-mile stretch of Pacific Coast Highway (PCH). The analysis must include visual simulations from key public vantage points to determine if the proposed medium-density housing will obstruct existing ocean views or alter the coastal character of the area. The analysis must include **3D wireframe and photo-simulations** specifically from the **Huntington Dog Beach parking lots, the intersection of**

Goldenwest Street and PCH, and the intersection of Seapoint Street and PCH to demonstrate the impact on the 'ocean horizon' line.

Hazards and Hazardous Materials: Given the site's extensive history as an active oil and gas production complex, the EIR must include a comprehensive study and detailed remediation plan to ensure soil and groundwater are safe for the proposed residential and park uses. The Hazards analysis must include a **vulnerability assessment** for Seacliff residents regarding **airborne toxins and dust** during the demolition of the existing oil infrastructure and the massive soil disturbance required for 800 units. I specifically request that the EIR include a **perimeter air monitoring plan** and a **fugitive dust control program** that includes real-time public reporting during the remediation of the former Aera Energy infrastructure.

Transportation and Traffic: The analysis must quantify the impact of new vehicle trips on local intersection delays and overall circulation patterns **on Pacific Coast Highway (PCH) between Goldenwest Street and Seapoint Street**. The EIR must specifically study the impact of 800 new residential units and 350 hotel rooms on local intersection delays as a result of the increased vehicular volume. The traffic study must specifically analyze the **cumulative impact** of this project alongside existing congestion **between the intersections of PCH/Goldenwest Street and PCH/Seapoint Street** during peak summer weekend hours, not just standard weekday commute times. In addition, the traffic study must consider the **cumulative impacts** of this development alongside other recently approved or proposed projects in the North Coastal area to ensure the local infrastructure can handle the combined load.

Air Quality and Greenhouse Gas Emissions: The study must address emissions from both the large-scale demolition of industrial infrastructure and the long-term operational impacts of the new mixed-use community. The analysis must include a **vulnerability assessment** for Seacliff residents regarding air quality and greenhouse gas emissions as a result of both the demolition phase and long-term mixed-use plan.

Hydrology and Water Quality: Because the site is in the Coastal Zone, the EIR must detail how the project will manage runoff and protect nearby sensitive coastal resources.

Noise: The EIR must evaluate the potential for construction noise to disturb nearby residents and the long-term noise impacts from increased traffic and commercial activity.

Public Services and Utilities: The City must determine if existing water, sewer, and emergency services (fire and police) have sufficient capacity to support the proposed 92-acre development.

Cultural and Tribal Cultural Resources: The EIR must include a formal assessment of any potential impacts on subsurface resources, including consultation with local tribal governments as required by state law.

Project Alternatives: I request that the EIR include a **'Reduced Density Alternative'** that evaluates the environmental benefits of limiting the project to 400 units and restricting all building heights to **two stories** to preserve the coastal viewshed.

I appreciate the City's thoroughness in reviewing the Palm/Goldenwest Specific Plan Amendment. Please ensure the impacts listed above are studied using the most **current data and modeling** available. I request to be added to the notification list for all future public hearings and document releases related to this project (State Clearinghouse #2026020245).

In conclusion, while the transition from an industrial oil site is a significant shift for our community, it must not come at the expense of Huntington Beach's unique coastal character. I urge the City to prioritize **low-profile building heights** and **rigorous traffic mitigation** in the EIR to ensure this project does not overwhelm our local infrastructure or obstruct public views.

Thank you for considering these points during the environmental review process. I look forward to reviewing the Draft EIR once it is released.

Sincerely,

Manal F. Tadros
[redacted]

From: Peter Mouritz
To: Cortez, Joanna
Subject: Palm/Goldenwest Scoping Feedback 3/8/26
Date: Sunday, March 8, 2026 6:40:24 PM

You don't often get email from [redacted]. Learn why this is important

Hello Joanna,

Below is the feedback for scope and content of the draft EIR. Being a civilian, I'm not sure if all the issues below are directly relevant to the EIR or if some would be best brought up at the planning commission and/or city counsel General/Specific Plan Amendment meetings but gave it a shot anyway. Any guidance on relevancy and proper venue to address these issues would be greatly appreciated.

Best regards,
Peter Mouritz

Peter Mouritz
[redacted]

OPEN SPACE:
Planning Area 3B is not really open space - in reality it provides "continued access to oil and gas infrastructure" (page 45, 2.3.13). Also, given this 3.1 acres of land is on the other side of Seapoint, should not be included or count towards open space acreage for the project.

Open Space acreage allocation should be at least double the proposed open space acreage from 22.8 to 45 acres. The esplanade/greenbelt surrounding the development should be a minimum of 100 feet in from PCH/Palm/Goldenwest and Seapoint.

PEDESTRIAN CORRIDORS:
The central pedestrian corridor from Pattison Park to PCH should run the full length of the Pattison Park to PCH. These “corridors” are woefully inadequate and can provide excellent utility for visitors and residents if widened.

PROPOSED HOTEL:
1) Please provide data on hotel HVAC noise including estimated decibel levels. They are usually placed on the back and/or back area of the roof which will be closest to the Sea Cliff on the Greens residents. This is a very quiet neighborhood and will have a direct effect on local resident quality of life.

2) One major profit center for the hotel industry is on-site events e.g. weddings/parties/conventions.
Please provide details on noise abatement protocols for the hotel property regarding guest and/or events noise.
.
3) Please provide occupancy rates and RevPAR for Huntington Beach Hotels on PCH, south of the pier. I find it implausible that we need another hotel along the HB oceanfront given the low occupancy rates of the resort hotels south of the pier and recent approval of a hotel on the Magnolia Tanks project

TRAFFIC:
Increased traffic will be a concern - three driveways going in and out of residential and commercial properties onto PCH - this is an accident waiting to happen. How will this be addressed?

TOXIC LAND & AIR CONTAMINATES:
VOLATILE ORGANIC COMPOUNDS - CONTAMINATED LAND - BROWNFIELD MITIGATION METHODS
Please provide detailed plans on toxic clean up plans, measurement and mitigation methods.

Propose that Sea Cliff On The Greens homeowners should be compensated for toxic air/dirt/dust clean up that will pollute their homes during decommissioning the oil land infrastructure, toxic clean up and building given we are directly downwind from the project.

WILDLIFE SURVEY:
There was one wildlife survey, either by CRC or the City of Huntington Beach on May 19, 2025. This is the time of year when LESS bird species are present, due to migratory patterns. We request independent biologists from a reputable company, or institution like a college/university survey now or in late Fall, when migratory birds are present.

The DEIR is drafted with a viewpoint of the 92 acre site itself, the wetlands, ocean etc. It should also be considered with regard to the people nearby, which could be 2000 adjacent homes, when all sides of the site are considered, and include Pattinson Park users ("neighbors").

what are the number of parking spaces to be provided on the entire site? how many surface? underground,? near palm internal collector road, hotel?
how many cars, surface and below ground for the permanent residents? how many people will live there at full buildout?

what are the traffic counts for the pch, goldenwest, seapoint? how many cars will be entering/exiting on a daily basis for the residents, and retail? how many cars for the hotel and on days of events, weddings etc? how long will the PCH traffic lights be time wise and what is the traffic build up from that? how many cars can enter the main entrance on the pch from either side per green traffic light? what is the air pollution range of all of this compared to as the site is right now? impact with pattinson park, recreational users of the huntington club, and the neighbors? how much longer (pollution) will the existing traffic lights be?

why is the commercial development in the center of the site? why isn't it located closer to goldenwest which is closer to existing commercial and preserving more open space and view? how far is the setback for the nearest buildings on all 3 (non-pch) sides?

is there 1 scaled plan showing everything including outline of buildings housing, internal connector road, parking, promenade, setbacks, including the outline of housing, on the 3 non-pch roads?

is there an overhead view of the promenade from palm all the way to the pch with parking/ building outline/landscaping on either side?

regardless of this DEIR, what is the status of the Area energy development (2015-2020) plan which did not happen? what is the current plan absent this project which could be delayed years? what is that impact/phasing/timing? will the mitigation start prior to the completion of the approval process?

what is the impact of the wall on palm ave being removed? will free or any parking still be allowed on palm providing an easy cut through to the beach which will create much more traffic/noise/pollution coming and going?

leaving the palm ave wall leaves existing security, noise and drainage protection for the neighbors.

visual signage- what are the total number of signs that will be used on all sides of the 92 acres? will there be a billboard/advertising on the open space (3b) PCH site? what is allowed and what are all the impacts on all sides including 3b? Landscaping? will there be a deed restricting further development of 3b?

multi-use people/bike paths- what are the safety impacts? this would create a new " beach like" path, similar to the existing one on the other side of the pch. that path has a built in conflict among bike riders, skateboarders and people. this recreates that in the middle of a commercial/residential/hotel development.

more importantly, the internal collector road at the rear of the property, will be providing a biker's paradise that will be lit at dark and provide easy ingress/egress "escape" on seapoint, palm and goldenwest. there is no security to prevent the use of this raised alleyway (from palm) encouraging more "dare-devil" usage.

drainage- with the palm ave wall removed, what is the impact of the elevated (2+ feet) of landscaping? november 2025, during severe rain one night, the cherry hill entry road, and the guard houses at seacliff on the greens were inundated with water. the fire dept had to pump out water at 1 a.m. sending the water down to palm ave. if this happens when the palm wall is gone, the biker/pedestrian/promenade paths, that lead towards palm, and the water that cascades down from the surface area parking towards the raised berms are all heading to the same place. this is the chance to add to drainage on palm ave. which will have be a real impact.

how many/where are the "emergency" driveways noted in the DEIR? construction, size and what prevents usage by shoppers and beach parkers?

dog beach protection- with 800 housing units, beach parkers, hotel guest users, how many more people will be crossing the pch? (safety) goes back to pollution, traffic light timing, etc. will their be a prohibition against construction of a beach club across the street? can the dog beach, be protected with a "jetty" type idea to keep the new beach goers and the dogs allowed to be safe? improved restrooms?

Pattinson Park- there is an entrance at the back. what is the impact on the children's playground, basketball court, and park users.

Amenities- does the development have pools, pickleball/tennis courts, clubhouses and all of the impacts that come along with them?

Lighting- DEIR says no significant (3.2) impact on light/glare. yet there will be lighting on all sides of every building, cars on all sides. isn't this significant?

Visual- the hotel can be 4 stories (50 feet) and residential 35 feet. DEIR states that “may” impact pacific ocean views. what about the neighbors privacy? isn’t that considered a significant impact for a property not developed?

section 4-15/16 odors- DEIR says no odor impacts. there has been 100 years of oil and gas development/piping/storage at the site. the neighbors enjoy on shore ocean breezes year round other then when there are santa ana winds. whatever the mitigation entails, and over what period of time is not included. however, whatever is being removed, replaced, and then allowed to settle will not be short. whatever that site yields, with the help of the ocean breezes will be heading towards a large number of households. this should be considered significant.

4-14-air quality/pollutants- beyond what has been mentioned, the DEIR should be presented with more current mitigation/construction standards that consider the more likely mitigation/construction total time line and not the year 2020-2045 RTP/SCS. need realistic phasing/timing as this is significant.

4-82 school/students- the DEIR predicts 400 elementary school (grades k-5) to be added as a result of the buildout and states facilities are under used and thus this is not an impact requiring no further study. the applicant has not provided the current usage/population for say seacliff elementary. how many of the 400 students will be going to what school? how much traffic/pollution etc. resulting from this and does it impact busing? what is the predicted class size, usable existing square footage/recreational facilities/parking and phase in?

Security- there is no way to evaluate security for the neighbors during or after construction. if the palm ave wall remained, and if the commercial development moved towards goldenwest there are several other project developments that could enhance it to potential customers and residents. the goldenwest and seapoint entrances can remain but considered for different users.

Seapoint entry/exit- the distance to the pch/seapoint corner is short so making a right turn on to seapoint will be tricky. anyone living in this new project who wants to take the 405 north will most likely take the pch north to seal beach boulevard. the stretch north until you reach sunset during warm weather is crowded with people going to the state beach. need traffic info on the pch/seapoint corner and pch north to sunset especially on weekends. however people choose to go pch north will be influenced.

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ENDORSEMENTS

Amigos de Bolsa Chica
Algalita Marine Research Foundation
Anza Borrego Foundation
Ballona Wetlands Land Trust
City of Huntington Beach
City of Seal Beach
Friends of Harbors, Beaches and Parks
Huntington Beach Wetlands Conservancy
Huntington Beach Tomorrow
Orange Coast League of Women Voters
Orange County Coastkeeper
Peninsula Open Space Trust
Sea and Sage Audubon
Sierra Club Angeles Chapter
Surfrider Foundation

CALIFORNIA COUNCIL OF LAND TRUSTS
Member in Good Standing

March 9, 2026

Ms. Joanna Cortez
Principal Planner
City of Huntington Beach
Community Development Department
2000 Main Street
Huntington Beach, CA 92648
via e-mail to: Joanna.Cortez@surfcity-hb.org

Subject: Notice of Preparation (NOP) of a Draft Environmental Impact Report and Notice of a Public Scoping Meeting for the Palm/Goldenwest Specific Plan Amendment Project

Dear Ms. Cortez,

The Bolsa Chica Land Trust (BCLT) was formed in Huntington Beach in 1992 to preserve one of the last standing coastal wetland ecosystems in Southern California. BCLT has over 5,000 members dedicated to protecting, preserving, restoring, educating, and advocating for Bolsa Chica's future. BCLT proudly supports the State agencies tasked with the management and future sustainability of the Bolsa Chica Ecological Reserve. The Bolsa Chica Ecological Reserve is a 1,400-acre wetland/upland habitat which serves more than 900 species of wildlife, including:

- Western snowy plover (*Charadrius nivosus nivosus*; Federal Endangered Species Act (ESA)-listed threatened, California Species of Special Concern (SSC))
- Light-footed Ridgway's rail (*Rallus obsoletus levipes*; ESA-listed endangered, California Endangered Species Act (CESA) listed endangered, State Fully Protected (FP))
- Coastal California gnatcatcher (*Polioptila californica californica*; ESA-listed threatened, SSC)
- Belding's savannah sparrow (*Passerculus sandwichensis beldingi*; CESA-listed endangered)
- California least tern (*Sterna antillarum browni*; ESA-listed endangered, CESA-listed endangered, FP)
- White-tailed kite (*Elanus leucurus*; FP)
- Peregrine falcon (*Falco peregrinus anatum*)
- Burrowing owl (*Athene cunicularia*; CESA candidate)
- Northern harrier (*Circus hudsonius*; SSC)
- Cooper's hawk (*Accipiter cooperii*; CDFW Watch List (WL))
- Osprey (*Pandion haliaetus*; WL)

- Tricolored blackbird (*Agelaius tricolor*; CESA-listed threatened)
- California brown pelican (*Pelecanus occidentalis californicus*)
- Short-eared owl (*Asio flammeus*; SSC)

The close proximity of the Bolsa Chica Ecological Reserve to this proposed development by California Resources Corporation raises our concern. The development footprint is adjacent to sensitive habitat within the Pacific Flyway and is approximately 1,500–3,500 feet from critical California least tern and Western snowy plover nesting sites within the Reserve, thus our concern is warranted. Thus, we submit the following comments:

BCLT encourages the dedication of the parcel labeled 3B exclusively to habitat conservation and its full restoration for such purpose at the earliest opportunity. This parcel is on the border of the Ecological Reserve, cut off from the rest of the project, and is directly adjacent to sensitive wetland habitat.

We urge that the development and its use follow strict requirements to avoid harassing wildlife and damaging bird nests and wildlife habitat that may occur within the newly established open space/park planning area 3A. The use of herbicides/pesticides must be strictly regulated throughout the entire project footprint and used when only necessary and after other non-toxic methods have been found to fail. We strongly suggest quarterly biological monitoring of the project area for the life of the project for sensitive species, nesting habitats and wildlife usage, and full biological survey before any future substantial modifications of the open space areas (i.e. tree/shrub removal). No invasive plant material as identified by CDFW and the California Invasive Plant Council should be used in the landscaping proposed across the project footprint, and native vegetation should be incorporated where appropriate.

Consideration of the Pacific Flyway and avian density in the surrounding areas should be reflected in restricted building height and the use of shielded lighting with low wattage warm-colored LED lights throughout the project footprint to minimize light pollution/spill which disorients birds and other forms of wildlife. We urge the development plan to avoid glass walls or large glass windows along trails or property edges. Upon its completion, the glass wall along the trail at Brightwater has caused fatal bird strikes, even with the reflection decals adhered to alert birds to the glass, as they are hard to maintain and not as effective as intended.

The Bolsa Chica Land Trust also strongly urges strict adherence to AB 52 and SR 18 as outlined in the February 9, 2026 letter from NAHC. In addition to the concerns and recommendations contained within, BCLT fully supports all comments on this project submitted by the California Department of Fish and Wildlife.

For the many years CRC has operated at Bolsa Chica, we have been thankful for their support of educational and environmental projects within the Reserve. We are hopeful that this large development project reflects that commitment as well. Thank you for your attention to our concerns.

Best regards,



Kim Kolpin
Executive Director

From: Brian Merhar <[redacted]>
Sent: Monday, March 9, 2026 8:05 PM
To: Cortez, Joanna
Subject: Public Scope Meeting Palm/Goldenwest

Follow Up Flag: Follow up
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Categories: IMPORTANT

> You don't often get email from [redacted]. Learn why this is important

Hi I am writing to request that the proposed park north of seapoint be moved to the south end of goldenwest/pch. I am currently a homeowner in the Boardwalk community on goldenwest and orange.

Thanks,
Brian Merhar

March 9, 2026

VIA EMAIL

Joanna Cortez, Principal Planner
City of Huntington Beach
2000 Main Street
Huntington Beach, CA 92648
Email: joanna.cortez@surfcity-hb.org

Dear Ms. Cortez:

NOTICE OF PREPARATION – DRAFT EIR
PALM/GOLDENWEST SPECIFIC PLAN AMENDMENT PROJECT
SCH: NO. 2026020245

The Department of Conservation's Geologic Energy Management Division (Division) has reviewed the above-referenced project for impacts with Division jurisdictional authority. The Division supervises the drilling, maintenance, and plugging and abandonment of oil, gas, and geothermal wells in California. The Division offers the following comments for your consideration.

The project area is in Orange County. Division records indicate that the project area lies within the Huntington Beach Oil Field and that, as acknowledged in the Initial Study, most of the project area has been and continues to be used for oil and gas extraction. Within the project area, there are numerous active, idle, and plugged wells and associated infrastructure. Division information can be found at: www.conservation.ca.gov. Individual well records are also available on the Division's web site, or by emailing CalGEMSouthern@conservation.ca.gov.

The scope and content of information that is germane to the Division's responsibility are contained in Section 3000 et seq. of the Public Resources Code, and administrative regulations under Title 14, Division 2, Chapters 2, 3 and 4 of the California Code of Regulations.

If any wells, including any plugged, abandoned or unrecorded wells, are damaged or uncovered during excavation or grading, remedial plugging operations may be required. If such damage or discovery occurs, the Division's district office must be contacted to obtain information on the requirements and approval to perform remedial operations.

The possibility for future problems from oil and gas wells that have been plugged and abandoned, or reabandoned, to the Division's current specifications are remote. However, the Division recommends that a diligent effort be made to avoid building over any plugged and abandoned well.

Questions regarding the Division's Construction Site Well Review Program can be addressed to the local Division's office in Long Beach by emailing CalGEMSouthern@conservation.ca.gov or by calling (562) 637-4400.

Sincerely,

Curtis M. Welty, PG
Associate Oil and Gas Engineer

cc: Governor's Office of Planning and Research, State Clearinghouse Unit
Email: state.clearinghouse@opr.ca.gov

Office of Legislative and Regulatory Affairs
Email: OLRA@conservation.ca.gov

Jan Perez, CalGEM CEQA Unit
Email: Jan.Perez@conservation.ca.gov

Environmental CEQA File

California Department of Transportation

DISTRICT 12
1750 East 4th Street, Suite 100| SANTA ANA, CA 92705
(657) 328-6000 | FAX (657) 328-6499
https://dot.ca.gov/caltrans-near-me/district-12

March 9, 2026

Joanna Cortez
City of Huntington Beach
2000 Main Street
Huntington Beach, CA 92648

File: LDR/CEQA
SCH: 2026020245
LDR LOG #2026-03035
SR-1

Dear Ms. Cortez,

Thank you for including the California Department of Transportation (Caltrans) in the review of the Notice of Preparation of a Draft Environmental Impact Report (EIR) for the Palm/Goldenwest Specific Plan Amendment Project. The proposed project approvals would facilitate the future redevelopment of the 92-acre project site, including the demolition and removal of existing oil and gas production infrastructure and the future construction of up to 800 residential units, up to 350 hotel rooms or other permitted visitor-serving uses, and various open space and park areas. Future buildout of the site would include new vehicular access points and internal circulation roadways, informational signage, utility and infrastructure connections, and multi-use paths. Under the proposed Palm/Goldenwest Specific Plan Amendment, the project site would be divided into three planning areas: Planning Area 1 (16 acres of Commercial Visitor uses), Planning Area 2 (53.2 acres of Medium Density Residential uses, which would be subdivided into Planning Areas 2A [30.8 acres] and 2B [22.4 acres]), and Planning Area 3 (22.8 acres of open space/park uses, which would be subdivided into Planning Area 3A [19.7 acres] and 3B [3.1 acres]). Project-specific design details for future residential and commercial development facilitated by approval of the proposed project are unknown at this time. Each future discretionary project facilitated by the proposed project would be subject to a project-specific CEQA review at the time it is proposed for consideration by the City. To streamline the process of future CEQA review, the proposed project conservatively analyzes a "worst-case" scenario of development, or the maximum allowable scale of future development allowed under applicable development standards as set forth in the Draft Amended Palm/Goldenwest Specific Plan.

The mission of Caltrans is Improving lives and communities through transportation. Caltrans is a commenting agency on this project and has the following comments:

1. Caltrans recognizes there is a strong link between transportation and land use. Development can have a significant impact on traffic and congestion on State transportation facilities. In particular, the pattern of land use can affect both local vehicle miles traveled and the number of trips. Caltrans supports collaboration with state and local agencies to work towards a safe, functional, interconnected, multi-modal transportation network integrated through applicable "smart growth" type land use planning and policies.

2. Caltrans is committed to prioritizing projects that are equitable and provide meaningful benefits to historically underserved communities, to ultimately improve transportation accessibility and quality of life for people in the communities we serve. We look forward to working with the city on areas of joint jurisdiction to enhance the transportation network and connections between various modes of travel, to improve the experience of those who use the transportation system.

3. Caltrans supports the City's progress in meeting its Regional Housing Needs Assessment (RHNA) allocation, and we encourage the City to promote the development of housing units for a variety of income levels.

4. Caltrans supports the design of Complete Streets that include high-quality pedestrian, bicycle, and transit facilities that are safe and comfortable for users of all ages and abilities. Improvements may include providing secure bicycle parking, pedestrian-oriented LED lighting, wayfinding signage, and comfortable connections to nearby active transportation and/or transit facilities. Complete Streets improvements also promote regional connectivity, improve air quality, reduce congestion, promote improved first-/last-mile connections, and increase safety for all modes of transportation.

5. New residential and commercial land uses provide an opportunity to encourage a variety of travel choices. With the increase of these land uses in the project area, and the proximity to nearby bicycle facilities, consider the inclusion of short/long-term bicycle parking for residents and guests.

6. Caltrans freight policy focuses on creating a sustainable, efficient, and resilient goods movement system, guided by the California Freight Mobility Plan (CFMP) and Executive Order B-32-15. Key priorities include decarbonizing the supply chain, improving infrastructure efficiency, enhancing safety, and ensuring environmental equity.

7. Assess how freight vehicles will interact with Goldenwest Street, Seapoint Street, and Pacific Coast Highway, including any potential queuing or circulation effects.

8. Ensure that driveway designs provide sufficient turning radii, sight distance, and lane width for freight and delivery vehicles.

9. Identify any freight–pedestrian–bicycle conflict points near Coastal Zone access areas and determine whether design features influence these interactions.

10. Document the types and frequencies of freight trips expected for residential, hotel, and visitor-serving components, including parcel, food service, and waste collection activity.

11. Analyze internal circulation patterns to determine whether delivery vehicles may queue or stage at access points.

12. Evaluate whether consolidated package drop-off facilities or automated lockers could reduce repetitive truck stops within residential areas.

13. Identify conditions that may lead to unauthorized truck staging or idling in nearby residential or recreational areas.

14. Determine whether short-term parking, staging, or waiting areas are required for freight and service vehicles.

15. Identify opportunities to incorporate electrical charging or plug-in infrastructure for delivery trucks or temperature -controlled vehicles, to address California's statewide transition toward zero-emission medium- and heavy-duty vehicles, per Governor's Executive order N-79-20.

16. Evaluate how freight delivery schedules and time-of-day operations may affect roadway congestion and network performance.

17. Identify construction truck routing patterns that may affect Coastal Zone access or surrounding neighborhoods.

18. Evaluate whether local streets may experience temporary truck staging or queueing during demolition and construction phases.

19. The project proposes a signalized intersection on SR-1 at the Main Entry of the proposed development. Submit a Traffic Signal Warrant Analysis prepared in

accordance with the CAMUTCD, to demonstrate the need for the proposed signal.

20. Please Submit a Traffic Impact Analysis (TIA) evaluating the project's impact on SR-. The TIA should include an Intersection Capacity Analysis for the proposed signalized intersection on SR-1 (the proposed Main Entry). Additionally, address the impact to the Intersections of SR-1/Seapoint Street; SR-1/Warner Avenue; and SR-1/Goldenwest Street. All Intersection Capacity Analysis shall be conducted by Highway Capacity Manual (HCM) Methodology

21. The TIA should evaluate the impacts to SR-1 for the proposed two Secondary Entrances (Right-In, Right-Out). The speed limit in this section of SR-1 is posted at 55 mph. The proposed access points shall include deceleration and acceleration lanes. The proposed turning lanes shall include a Queue Analysis indicating that they will have sufficient vehicular storage so the turning traffic will not spill back to the through lanes on SR-1.

22. Section 2.3.3.4 Parking of the Initial Study states "…. Additionally, between 60 and 100 parking spaces would be provided along the eastern curb of SR-1 within the esplanade (Walkway) near Sea Point Street." This section of SR-1 is posted at 55 mph. The proposed parking on the on SR-1 is not recommended.

23. Please coordinate with Caltrans Project Management for a 6-Foot Class II Bike Lane with a 2-Foot Buffer currently under construction on SR-1 within the location in question.

24. During construction, please ensure that appropriate detours and safety measures are in place that prioritize the mobility, access, and safety of bicyclists, pedestrians, and transit users. If adjacent sidewalks or bike lanes need to be closed during construction, please ensure that closures and detours are clearly signed.

25. Please submit a VMT-based Traffic Impact Study. Please follow the Governor's Office of Planning and Research Guidance to identify VMT related impacts that include any potential mitigation measures necessary.

    With the enactment of Senate Bill 743 (SB 743), Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses VMT analysis for land use projects, please review Caltrans' Transportation Impact Study Guide to ensure a complete VMT-based Traffic Impact Study is prepared.

https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf

26. Any work performed within Caltrans right-of-way (R/W) will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans R/W prior to construction.

Please continue to coordinate with Caltrans for any future developments that could potentially impact the State transportation facilities. If you have any questions, please do not hesitate to contact Maryam Molavi at Maryam.Molavi@dot.ca.gov.

Sincerely,

Scott Shelley (Mar 9, 2026 16:17:34 PDT)

Scott Shelley
Branch Chief – Local Development Review/Climate Change/Transit Grants
District 12

From: Eric Bonholtzer <[redacted]>
Sent: Monday, March 9, 2026 4:03 PM
To: Cortez, Joanna
Subject: Formal CEQA Comment Letter – Environmental Impact Concerns Golden West / Seapoint Redevelopment Project

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: IMPORTANT

You don't often get email from [redacted]. Learn why this is important

Subject: Formal CEQA Comment Letter – Environmental Impact Concerns
Golden West / Seapoint Redevelopment Project

To: City of Huntington Beach Planning Department
Re: Environmental Impact Review – Golden West / Seapoint Oil Field Redevelopment Project

Dear Planning Department,

I am a resident of Huntington Beach submitting formal comments regarding the proposed redevelopment of the former oil field property located between Golden West Street and Seapoint Street along Pacific Coast Highway. These comments are submitted during the Environmental Impact Report (EIR) review process pursuant to the California Environmental Quality Act (CEQA).

Given the scope of the proposed project—including approximately 800 residential units, a 350-room hotel, retail space, and associated parking and infrastructure—the City must ensure that the Environmental Impact Report provides a comprehensive, transparent, and legally adequate evaluation of all potentially significant environmental impacts associated with this development.

Because this project is located within a sensitive coastal environment and on a historically industrial site, the environmental review must carefully analyze the following issues.

Traffic, Air Quality, and Greenhouse Gas Emissions

The proposed development is expected to generate a substantial increase in daily vehicle trips from residents, hotel guests, employees, service vehicles, and retail patrons. The EIR must fully quantify project-generated vehicle miles traveled, evaluate impacts to traffic circulation along Pacific Coast Highway and surrounding residential corridors, and analyze resulting greenhouse gas emissions and localized air quality impacts.

This coastal corridor already experiences significant seasonal and weekend congestion due to beach access and tourism. The addition of large-scale residential and hotel uses will certainly exacerbate these conditions. The EIR must clearly disclose whether the project will contribute to significant cumulative greenhouse gas emissions or regional air quality degradation and must identify mitigation measures capable of reducing impacts to the maximum extent feasible.

Coastal Habitat, Wetland, and Wildlife Impacts

The project site's proximity to the Bolsa Chica Ecological Reserve raises substantial concerns regarding potential impacts to sensitive coastal ecosystems, wetlands, wildlife corridors, and migratory bird habitats.

Construction activity, increased human presence, noise, and nighttime lighting associated with hotel and commercial operations may disrupt wildlife behavior and alter habitat conditions. The EIR must analyze these impacts in detail and evaluate whether lighting, noise, and increased activity could negatively affect protected species or nearby ecological systems.

Hazardous Materials and Oil Field Remediation

The proposed development site has historically functioned as an oil extraction field. As such, the EIR must include a detailed analysis of potential soil contamination, groundwater contamination, methane migration, and other hazardous material risks associated with legacy petroleum operations.

The environmental review must disclose whether hazardous materials remain present at the site and must clearly describe remediation strategies intended to protect construction workers, future residents, nearby communities, and surrounding environmental resources. Any remediation plan should be subject to rigorous oversight and public disclosure.

Construction-Related Environmental Impacts

Due to the scale of the project, construction activities may occur over an extended period and involve significant grading, heavy equipment operation, and site disturbance. The EIR must evaluate potential impacts including dust emissions, particulate matter, noise pollution, and construction-related traffic.

Mitigation measures must address potential effects on nearby residential communities and environmentally sensitive areas.

Water Supply and Stormwater Management

The addition of hundreds of residential units and a large hotel facility will significantly increase water demand. The EIR should analyze whether existing water supply

infrastructure can support this demand without adversely affecting regional water resources.

Additionally, stormwater runoff from large-scale development has the potential to degrade coastal water quality. The EIR must evaluate runoff management strategies and demonstrate that adequate measures will be implemented to prevent contamination of coastal and marine environments.

Cumulative Environmental Impacts

CEQA requires a thorough evaluation of cumulative impacts associated with other past, present, and reasonably foreseeable future development within the region.

The EIR must analyze whether the combined effects of population growth, tourism activity, increased vehicle traffic, and coastal development may collectively impact regional air quality, greenhouse gas emissions, coastal resources, and public infrastructure capacity.

Alternatives Analysis

CEQA requires that the EIR evaluate a reasonable range of project alternatives capable of reducing environmental impacts. The EIR should analyze alternatives such as reduced-density development, elimination or reduction of the hotel component, and alternative site design configurations that may minimize environmental disturbance while still achieving project objectives.

Failure to meaningfully analyze such alternatives would render the environmental review incomplete.

Adequacy of Environmental Review

These comments are intended to assist the City in preparing a legally adequate Environmental Impact Report. However, due to the limited information currently available regarding the project and its environmental analysis, these comments should not be interpreted as exhaustive.

The City has a continuing obligation under CEQA to fully investigate, disclose, and mitigate all potentially significant environmental impacts associated with the project.

Preservation of CEQA Rights

These comments are submitted for the purpose of ensuring that all environmental issues associated with the project are adequately addressed in the Environmental Impact Report. To the extent that the EIR fails to fully analyze or mitigate potentially significant impacts, the undersigned reserves all rights to raise additional concerns and to challenge the adequacy of the environmental review under CEQA.

Conclusion

Given the scale of the proposed development and its location within a sensitive coastal environment, it is essential that the City conduct a thorough and transparent environmental review that complies fully with the requirements of CEQA.

Thank you for the opportunity to provide comments during this public review process.

Sincerely,

Best,

Eric Bonholtzer, Esq.
[redacted]

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The information contained in this e-mail, and any attachments thereto, is only for the use of the recipient(s) named above. This message, and its attachments, may contain information that falls under the attorney-client and/or work product privileges. Receipt of this message by an unintended recipient does not constitute a waiver by the sender of any and all applicable privileges. If you are not the intended recipient of this e-mail and any attachments, or an agent responsible for delivering it to the intended recipients, you are hereby notified that any use, dissemination, distribution, downloading, or copying of this communication is strictly prohibited. If you have received this e-mail in error, please notify the sender immediately by e-mail, permanently delete the e-mail and any attachments immediately, and destroy all copies.

OCTA

AFFILIATED AGENCIES

Orange County Transit District

Local Transportation Authority

Service Authority for Freeway Emergencies

Consolidated Transportation Service Agency

Congestion Management Agency

March 9, 2026

Ms. Joanna Cortez
Principal Planner
City of Huntington Beach
Community Development Department
2000 Main Street
Huntington Beach, CA 92648

Via email: Joanna.Cortez@surfcity-hb.org

Subject: **Palm/Goldenwest Specific Plan Amendment Project Notice of Preparation and Initial Study**

Dear Ms. Cortez:

Thank you for the opportunity for the Orange County Transportation Authority (OCTA) to review the Notice of Preparation of a Draft Environmental Impact Report and the Initial Study (IS) for the Palm/Goldenwest Specific Plan Amendment Project. The following comments regarding the IS are provided for your consideration:

- Page 2-45, Section 2.3.3.3 ("Transit Access"), states, "The project site is also served by OCTA Route 25, which connects the project site to La Palma to the north." Please revise this to state Fullerton instead of La Palma, as Route 25 terminates at the Fullerton Park-and-Ride.

- Please add a Public Rights-of-Way Accessibility Guidelines-compliant sidewalk connecting Pacific Coast Highway from Goldenwest Street to Seapoint Drive and refer to OCTA's Transit Supportive Design Guidelines at the following link: https://octa.net/News-and-Resources/Publications/Transit-Supportive-Design-Guidelines/

Thank you for the opportunity to review this document. Should you have any questions or comments, please contact me at (714) 560-5907 or at dphu@octa.net.

Sincerely,

For

Dan Phu
Director, Transportation Planning and Analysis

DP:ls

PUBLIC SCOPING MEETING
PALM/GOLDENWEST SPECIFIC PLAN AMENDMENT PROJECT EIR
FEBRUARY 18, 2026, 6:30 PM

NAME: SIMON CAIL

ADDRESS: [redacted] CITY: HB ZIP: 92648

EMAIL ADDRESS: [redacted]

REPRESENTING: SELF, PROPERTY OWNER

Do you wish to be added to the project mailing list? ☒ YES ☐ NO

Please drop comments in the Comment Box or mail them to:

City of Huntington Beach
Community Development Department
Joanna Cortez, Principal Planner
2000 Main Street
Huntington Beach, CA 92648
Phone: 714-374-1547
E-mail: joanna.cortez@surfcity-hb.org

The purpose of this comment card is to solicit input regarding the scope and content of the Environmental Impact Report (EIR). Please submit comments for the record that pertain to the ***environmental issues*** to be addressed in the EIR (please print).

- CONCERN; AIRBORNE CARCINOGENS FROM OIL FIELD REMEDIATION / CLEAN UP.

- I LIVE 200' DOWN WIND OF THIS PROPERTY, WHAT WILL PREVENT CARCINOGEN LADEN DUST FROM BLOWING OVER MY HOME? WILL AIR QUALITY MONITORS BE USED?

- NOISE POLLUTION DURING CONSTRUCTION... I'm A PILOT AND WORK 24/7, OFTEN SLEEPING DURING THE DAY TO BE RESTED FOR NIGHT FLIGHTS. WHAT NOISE WILL THIS CREATE? WILL NOISE BARRIERS BE USED?

From: The Sizlos
To: Cortez, Joanna
Subject: Follow up to my CRC project email
Date: Monday, March 9, 2026 1:27:44 PM

> You don't often get email from [redacted]. Learn why this is important

Hello Joanna,
This is a follow up to my email sent this weekend regarding the CRC proposed development along PCH.

I had provided several comments addressing the proposed Seapoint St entrance and just realized that an entrance here is most likely needed for safety reasons.
Our adjacent Surfcrest Community of only 115 homes has 4 entrances, a main vehicle entrance on Seapoint St, a secondary vehicle entrance on Palm Ave and 2 more **HB Fire Department 'ONLY '** entrances also on Palm Ave.

The 2 resident entrances have no opposing center median divider allowing for left turns into and out of Surfcrest.

The 2 **Fire Department ONLY** entrances can only be accessed by the Fire Department. They **do** have opposing center media dividers which prohibits left turns into or out of Surfcrest. These entrances also have concrete pavers with sculptured openings with planted grass for the entrance surface within the Surfcrest opening for the Fire Department vehicles.

All Surfcrest roadways, including the special entrances for Fire Vehicles, comply with the HB Fire Department Physical requirements and signage. They are all fire lanes.

Thank you for your attention to our community comments,

Tom Sizlo

From: Denise Nguyen <[redacted]>
Sent: Monday, March 9, 2026 5:02 PM
To: Cortez, Joanna
Subject: Public comments

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: IMPORTANT

You don't often get email from [redacted]. Learn why this is important

Dear Joanna Cortez,

I'd like to submit public comments for the land use along PCH, between Seapoint Street and Goldenwest Street.

Could you please consider the following?

- Since the land is adjacent to Bolsa Chica Ecological Preserve, please consider not building in all of the Planning Area 2B (Residential Medium 22.4 AC) area for the continuity of the naturalized areas, especially towards Seapoint Street. It would be wonderful if the land was not completely taken up by homes in that area and the area could remain quiet for the coastal habitats.
- There is a proposal for a possible hotel in the Planning Area 1 (Commercial Visitor 16.0 AC). While a hotel makes sense in the areas closer to downtown Huntington Beach and Pacific City, what would be the benefit for one in this area? Besides the beach, there is not much to do within walking distance. Not having a hotel would also keep the area quiet and traffic down. Downtown is already congested during the summer and it would be great if we didn't have another congested area along PCH.
- Extreme care and caution is taken when plugging up oil wells and cleaning up the land due to the proximity of residential homes nearby

Thank you for your consideration!

From: Mike Wright <[redacted]>
Sent: Monday, March 9, 2026 5:18 PM
To: Cortez, Joanna
Cc: [redacted]
Subject: Scoping Comments – Palm/Goldenwest Specific Plan Amendment Project (DEIR)

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: IMPORTANT

You don't often get email from [redacted]. Learn why this is important

Subject: Scoping Comments – Palm/Goldenwest Specific Plan Amendment Project (DEIR)

Dear Ms. Cortez,

I am a Huntington Beach resident submitting scoping comments regarding the Draft Environmental Impact Report (DEIR) for the Palm/Goldenwest Specific Plan Amendment Project.

Given the scale of the proposed development and its location within the Coastal Zone, I respectfully request that the DEIR thoroughly analyze the following issues:

• Coastal Act Consistency and Loss of Visitor-Serving Land
The project proposes converting land currently designated Commercial Visitor (CV) into residential uses. The DEIR must evaluate whether this conversion is consistent with the California Coastal Act, including Sections 30210–30214 (public access) and Section 30222 (priority for visitor-serving uses). The analysis should also address whether this change permanently reduces visitor-serving coastal land and whether feasible alternatives exist that maintain higher visitor-serving intensity.

• Traffic, Circulation, and Beach Access Impacts
The project proposes up to 800 residential units and 350 hotel rooms. The DEIR must analyze daily and **peak-hour trip generation**, weekend and peak beach-season traffic, and cumulative impacts on Goldenwest Street, Palm Avenue, Seapoint Street, and Pacific Coast Highway. Even under SB 743, the DEIR should evaluate local circulation, roadway safety, neighborhood intrusion, and potential impacts to coastal access routes.

• Potential Creation of a PCH-to-Palm Circulation Corridor
Currently there is no direct connection between Pacific Coast Highway and Palm Avenue. If the proposed internal circulation network effectively creates such a corridor, it could induce cut-through traffic, increase beach-season overflow parking, and create pedestrian

safety issues in nearby neighborhoods. The DEIR should clearly analyze whether such connectivity would occur and evaluate associated traffic and safety impacts.

• Oil and Gas Site Remediation
The project site currently contains oil and gas infrastructure. The DEIR must include comprehensive hazardous materials analysis, including Phase I and Phase II Environmental Site Assessments, well abandonment procedures, methane migration risk analysis, soil remediation plans, and long-term environmental monitoring requirements.

• Emergency Evacuation and Hazard Planning
Due to the project's coastal location and proximity to wetlands, the DEIR should include quantitative evacuation modeling for wildfire, flood, and sea-level rise scenarios. Evacuation clearance times should be evaluated under peak beach-season traffic conditions.

• Public Services and Parking Spillover
Palm Avenue already experiences parking pressure and vehicle dwelling activity. The DEIR should evaluate whether increased density or new circulation patterns could increase parking demand, sanitation needs, and law enforcement service requirements.

• Sea-Level Rise and Coastal Hazards
The DEIR should include sea-level rise projections through 2100 consistent with Coastal Commission guidance and evaluate long-term coastal hazard exposure and adaptation strategies.

Thank you for the opportunity to provide comments during the scoping process. I respectfully request that these issues be thoroughly evaluated in the Draft Environmental Impact Report.

Sincerely,
Michael & Brooke Wright
[redacted]
[redacted]



WHILE OTHERS TALK WE PERFORM
THE WRIGHT
TEAM

Mike Wright
Vice President/Mortgage

[redacted]

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Docusign Envelope ID: 5108C0EC-BDA0-44CD-8A20-35A4C9F40D1C

STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE

GAVIN NEWSOM, Governor
MEGHAN HERTEL, Director

South Coast Region
3883 Ruffin Road
San Diego, CA 92123
wildlife.ca.gov

March 23, 2026

Joanna Cortez
Principal Planner, Community Development Department
City of Huntington Beach
2000 Main Street
Huntington Beach, CA 92648
Joanna.Cortez@surfcity-hb.org

Subject: Notice of Preparation and Initial Study of a Draft Programmatic Environmental Impact Report for the Palm/Goldenwest Specific Plan Amendment Project, SCH No. 2026020245, Orange County, CA

Dear Joana Cortez:

The California Department of Fish and Wildlife (CDFW) reviewed the Notice of Preparation (NOP) and Initial Study from City of Huntington Beach (City) for the Palm/Goldenwest Specific Plan Amendment (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines[1].

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

Docusign Envelope ID: 5108C0EC-BDA0-44CD-8A20-35A4C9F40D1C

CDFW Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Fish & G. Code, § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 *et seq*.). Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law[2] of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.) or the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

CDFW also administers the Natural Community Conservation Planning (NCCP) program, a regional habitat conservation planning framework authorized under the NCCP Act (Fish and Game Code 2800 et seq.). The Orange County Transportation Authority (OCTA) implements the Measure M2 Natural Community Conservation Plan/Habitat Conservation Plan (NCCP/HCP), which provides a regional conservation and mitigation strategy for freeway improvement projects funded through the Measure M2 transportation program. The U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife (collectively, the Wildlife Agencies) issued incidental take permits to OCTA under the federal Endangered

[2] "Take" is defined in Section 86 of the Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill."

Docusign Envelope ID: 5108C0EC-BDA0-44CD-8A20-35A4C9F40D1C

Species Act and the State Natural Community Conservation Planning Act to implement the program.

Project Description Summary

Proponent: The City of Huntington Beach

Objective: The proposed Project amends the Palm Goldenwest Specific Plan to redevelop the 92-acre Project site. The Project includes demolition and removal of existing oil and gas production infrastructure, which will require well abandonment, pipeline removal, soil remediation activities, and the future development of a mixed-use community consisting of residential, visitor-serving, and open space uses. The Project accommodates construction of up to 800 residential units, up to 350 hotel rooms or other permitted visitor-serving commercial uses, and various open space and park areas. Project buildout would also include construction of new vehicular access points, internal circulation roadways, multi-use paths, informational signage, and new or expanded utility and infrastructure connections.

The Palm Goldenwest Specific Plan Amendment divides the Project site into three planning areas:

- Planning Area 1 - 16 acres of Commercial Visitor uses
- Planning Area 2 - 53.2 acres of Medium Density Residential uses, subdivided into;
    - Planning Areas 2A [30.8 acres]
    - Planning Area 2B [22.4 acres]
- Planning Area 3 - 22.8 acres of open space/park uses, subdivided into;
    - Planning Area 3A [19.7 acres]
    - Planning Area 3B [3.1 acres]

The Project would allow Medium Density Residential units within Planning Area 2 and would establish development standards, background information, and implementation requirements for future residential and commercial development within the site.

The Draft Environmental Impact Report (DEIR) associated with the Project will analyze effects of implementing the maximum development allowed within the Project boundary. The NOP indicates that individual future development projects will undergo Project-specific environmental review pursuant to CEQA.

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Location: The Project site is located at 20101 Goldenwest Street and comprises approximately 92-acres of a 146-acre Palm/Goldenwest Specific Plan Area in the City of Huntington Beach, Orange County, California. The Project site is directly bordered by oil and gas production infrastructure and open space to the north; Goldenwest Street to the south; Palm Avenue, residential neighborhoods and Pattinson Park to the east; and PCH to the west.

Biological Setting: Most of the Project site is developed with oil and gas production facilities, and the undeveloped area in the northwest corner is characterized by ornamental vegetation such as Brazilian peppertree (*Schinus terebinthifolia*), California palm (*Washingtonia filifera*), African iris (*Dietes iridioides*), bottlebrush (*Callistemon* sp.), Chinese juniper (*Juniperus chinensis*), Indian hawthorne (*Rhaphiolepis indica*), bird of paradise (*Strelitzia spp*.), New Zealand flax (*Phormium tenax*), and mousehole tree (*Myoporum laetum*). The proposed open space across Seapoint Street (Planning Area 3B) consists of dense mats of invasive ice plant (*Carpobrotus edulis*).

East of the Project site, beyond residential neighborhoods, there are open space and walking trails associated with Harriett M. Wieder Regional Park (HMWRP). The HMWRP is host to one of OCTA's restored coastal sage scrub habitat mitigation sites, which supports a population of Southern tarplant (*Centromadia parryi ssp. australis*; California Native Plant Society (CNPS Rank 1B.1), actively managed by the Bolsa Chica Conservancy. The Project is also located within the California Coastal Zone pursuant to the California Coastal Act.

North of the Project site, beyond the oil and gas production infrastructure and open space, is Balsa Chica Ecological Reserve (BCER), which is owned by the State Lands Commission and managed by the California Department of Fish and Wildlife. BCER is an approximately 1,300-acre coastal estuary which contains open water, mudflats, coastal dunes, riparian habitats, freshwater marsh, and saltwater marsh. This reserve is an important stopover along the Pacific Flyway for hundreds of migratory bird species and is a critical reserve area that provides important habitat for sensitive wildlife species, including, but not limited to.:

- Western snowy plover (*Charadrius nivosus nivosus*; Federal Endangered Species Act (ESA)-listed threatened, California Species of Special Concern (SSC))
- Light-footed Ridgway's rail (*Rallus obsoletus levipes*; ESA-listed endangered, California Endangered Species Act (CESA)- listed endangered, State Fully Protected (FP))
- Coastal California gnatcatcher (*Polioptila californica californica*; ESA-listed threatened, SSC)

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- Belding's savannah sparrow (*Passerculus sandwichensis beldingi*; CESA-listed endangered)
- California least tern (*Sterna antillarum browni*; ESA-listed endangered, CESA-listed endangered, FP)
- White-tailed kite (*Elanus leucurus*; FP)
- Burrowing owl (*Athene cunicularia*; CESA candidate)
- Northern harrier (*Circus hudsonius*; SSC)
- Cooper's hawk (*Accipiter cooperii*; CDFW Watch List (WL))
- Osprey (*Pandion haliaetus*; WL)
- Tricolored blackbird (*Agelaius tricolor*; CESA-listed threatened)
- Short-eared owl (*Asio flammeus*; SSC)

Though habitat within the Project areas is described as developed or highly disturbed, a literature search per the Biological Resources Assessment (BRA; ELMT Consulting, Inc. December 2025) identified 31 special-status plant species, 87 special-status wildlife species and 4 special status plant communities reported in the Seal Beach and Newport Beach quadrangles. Based on CDFW's review of the BRA and a desktop review of CNDDB, the following species were detected or have the potential to occur in addition to the list for BCER above:

Birds:

- Least Bell's vireo (*Vireo bellii pusillus*; ESA-listed endangered, CESA-listed endangered)
- Double-crested cormorant (*Phalacrocorax auritus*; WL)
- California horned lark (*Eremophila alpestris actia;* WL)
- California gull (*Larus californicus;* WL)

Plants:

- Southern tarplant (*Centromadia parryi ssp. australis*; California Native Plant Society [CNPS] Rank 1B.1)
- Salt marsh bird's beak (*Cordylanthus maritimus* ssp. *maritimus*); CNPS Rank 1B.1)

Project History: CDFW's regulatory staff and BCER land managers met on June 23, 2025, with the California Resources Corporation (Applicant) and the City to discuss the Project's CEQA scope and permitting needs. At that time CDFW relayed concerns regarding adjacency issues along the BCER and other sensitive habitat areas, including beach and dune habitats. During the meeting, we expressed concern about potential impacts from increased

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construction noise, artificial lighting, human disturbance (e.g., unleashed dogs and outdoor domestic cats), and the need for predator management if landscaping along the greenbelt incidentally creates perches along nesting habitats such as with tall palm trees. We are disappointed that concerns from that discussion were not included in the NOP.

Comments and Recommendations

CDFW offers the comments and recommendations below to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources; and to ensure Project consistency with regional conservation objectives in the OCTA Measure 2 NCCP/HCP.

Specific Comments

1. Inadequate Cumulative Impact Analysis and Unsupported "Less Than Significant" Determination. The City's determination that impacts to biological resources would be "less than significant" is not supported by substantial evidence because it fails to evaluate the Project in the context of the whole of the action, including surrounding development, adjacent conserved lands, and cumulative buildout of this coastal segment.

   Under CEQA Guidelines §15064, 15130, and Appendix G (Biological Resources), significance determinations must consider not only the Project in isolation, but also its incremental contribution to cumulative impacts when combined with past, present and reasonably foreseeable future projects. The proposed Project represents one of the last remaining undeveloped segments of this coastal strip, making its contribution to cumulative habitat loss, fragmentation and disturbance particularly important.

   More importantly, the NOP explicitly states that biological resources will not be analyzed in the DEIR and instead relies on the incorporation of *Standard Conditions.* This approach preemptively dismisses meaningful evaluation of whether the Project's impacts- when considered alongside development and existing pressures on adjacent habitats- may be cumulatively considerable.

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The Project site is immediately adjacent to open space lands, BCER, and HMWRP that support sensitive habitats and established mitigation sites. The site is also adjacent to known habitat for western snowy plover, California least tern, coastal California gnatcatcher, western burrowing owls, and Belding's Savannah Sparrow. Nesting areas for least tern and western snowy plover are located, at maximum, a mere 3,000 feet from the Project area (pers. Comm., Melissa Borde, BCER Land Manager).

Because the Project is in the vicinity of conserved lands that support special-status species and mitigation habitat, pursuant to CEQA Guidelines §15064(f)(1), an EIR must evaluate these potentially significant impacts rather than defer or dismiss them through inclusion of *Standard Conditions*.

Further, without a comprehensive description of the biological baseline condition of the Project site and the surrounding landscape, the DEIR will not meaningfully assess Project-related impacts as required under CEQA Guidelines §15125(a).

Given the Project's setting, the DEIR should evaluate;

a) Existing habitat conditions on-site and in adjacent preserved lands;

b) Progressive loss of coastal habitat and open space along this shoreline;

c) The Project's role in contributing to habitat fragmentation, edge effects, and increased human pressure; and

d) Whether these incremental effects are cumulatively considerable under CEQA Guidelines §15130.

Absent this analysis, any conclusion of less than significant is premature, failing to account for the Projects incremental contribution to environmental change in an already constrained coastal setting, and lacks substantial evidence.

2. Inadequate Indirect Impact Analysis. The DEIR must evaluate not only direct impacts, but also indirect impacts, adjacency issues, and cumulative impacts to biological resources including the above-referenced special status species and sensitive habitats.

   Pursuant to CEQA Guidelines §15126.2(a), the DEIR must analyze both direct and reasonably foreseeable indirect impacts. The current NOP's characterization of impacts to biological resources as "less than significant" fails to consider the

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reasonably foreseeable indirect and cumulative impacts associated with increased human activity and development adjacent to sensitive and conserved lands.

Given the Project's adjacency to preserved lands and mitigation sites, the DEIR shall evaluate;

a) Potential edge effects (lighting, noise, invasive species, domestic animals);

b) Increased human presence and recreational pressure on conserved lands and public beaches;

c) Hydrological or drainage changes affecting adjacent habitats;

d) Barriers to wildlife movement;

e) Degradation of mitigation lands established to offset impacts from other projects.

The DEIR should specifically analyze the potential for increased human access and activity to adversely affect biological resources along the approximately two-mile stretch of shoreline adjacent to the Project site. This area currently experiences relatively limited and concentrated public use, with access largely confined to designated areas such as the dog beach and with portions of the shorelines screened from view and disturbance. Any change that facilities increased access or use of the shoreline- regardless of the species project components – has the potential to intensify disturbance within sensitive coastal habitats.

Increased access and human activity is highly likely to result in:

a) Disturbance to beach-nesting and foraging bird species, especially California least tern and western snowy plover;

b) Reduced nesting success;

c) Increased trampling of sensitive beach and dune habitats;

d) Increased predator presence associated with domestic animals or nonnative landscaping creating roosts or perches for raptors; and,

e) Displacement of species from otherwise suitable habitats.

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These indirect effects must be analyzed in detail in the DEIR, including the extent to which increased disturbance may affect species behavior, habitat use, and reproductive success over time. Appendix G of the CEQA Guidelines specifically requires evaluation of impacts to wildlife movement corridors and nursery sites, both of which may be affected by increased human activity and habitat fragmentation.

As mentioned in comment 1 above, cumulative biological impacts must be evaluated pursuant to CEQA Guidelines §15130. The Project's incremental contribution to habitat fragmentation, disturbance, and recreational pressure must be considered in combination with past, present, and reasonably foreseeable future projects in the region. The DEIR must assess whether incremental increases in lighting, noise, access, and human activity—when combined with regional growth—would result in cumulatively considerable impacts to the unique and sensitive habitats directly adjacent to the Project site.

Absent this analysis, the DEIR would fail to meet CEQA's requirement to fully disclose and evaluate the Project's full environmental consequences.

3. Deferral and Enforceability of Mitigation Measures. The DEIR should include specific and enforceable mitigation measures which avoid, minimize, and/or mitigate impacts to biological resources. While the BRA recommends biological measures intended to reduce impacts to biological resources to "less than significant" levels, the NOP does not clearly identify the mechanism by which these measures will be enforced and instead appears to rely on *Standard Conditions* for compliance.

   Under CEQA Guidelines §15126.4(a)(1), mitigation measures must be:

   a) Fully enforceable through permit conditions or binding agreements;

   b) Clearly described with specific performance standards; and

   c) Capable of successful implementation.

   If the DEIR relies on recommended measures to support a "less than significant" conclusion, those measures must be incorporated into the Project description and adopted through a Mitigation Monitoring and Reporting Program pursuant to Public Resources Code §21081.6 and CEQA Guidelines §15097.

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The NOP clearly states that these conditions "shall be incorporated to ensure that the proposed project has minimal impacts related to special-status wildlife species." However, inclusion of these conditions suggests that impacts may be more appropriately characterized as "less than significant with mitigation", rather than inherently less than significant. Reliance on undefined *Standard Conditions* to support a less than significant determination constitutes improper deferral of mitigation.

For example:

a) Standard Condition Bio-1 references surveys and mitigation for special status plant species, but does not specify enforcement mechanisms, responsible parties, timing, or remedies in the event of non-compliance by future applicants.

b) Standard Condition BIO 2 and 3 incorrectly cites the federal Migratory Bird Treaty Act (MBTA), rather than the applicable California Fish and Game Code §§3503 and 3503.5, which regulates active bird nests at the state level.

Additionally, for fully protected species such as California least tern, take is prohibited under California law, and there is no permit that can be issued authorizing incidental take. Therefore, mitigation measures must emphasize avoidance and impact prevention, rather than deferred, compensatory, or performance-based mitigation approaches.

Absent clearly defied, enforceable, performance-based mitigation measure incorporated into the Project and MMRP, the DEIR would not comply with CEWQA requirements and would lack substantial evidence to support a "less than significant" impact conclusion.

4. Potential Increase in Human-Wildlife Interactions and Recreational Pressures on Adjacent Open Space and Coastal Habitats. the DEIR should evaluate the potential for increased human–wildlife interactions that may result from future development. Future development includes residential building, commercial areas, greenbelt features, and enhanced public access to coastal areas. Development of new housing, visitor serving uses, and recreational amenities adjacent to open space and conserved lands is likely to substantially increase human presence in areas that currently support sensitive habitats and wildlife. This is because the Project site is adjacent to highly sensitive coastal habitats known to support special status species. Increased residential occupancy, tourist visitation, commercial activity, and public

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access associated with the Project will increase visitation to nearby beaches trails, particularly along the two-mile stretch of shoreline parallel to the Project site.

The DEIR should also evaluate whether increased public access and human activity associated with the Project may result in increased disturbance to wildlife through activities such as:

a) Increased pedestrian and recreational use of beaches and adjacent open space trails;

b) Disturbance to nesting, foraging, roosting birds;

c) Trampling of sensitive dune or beach habitat;

d) Unauthorized trail creation or off-trail access into sensitive habitat areas;

e) Domestic animal interaction, including dogs entering protected habitat areas;

f) Feeding of wildlife;

g) Vandalism or disturbance of nesting areas; and,

h) Other forms of recreational pressure that could degrade habitat quality.

To reduce potential human-wildlife conflicts and habitat disturbance, the DEIR should identify management strategies that are necessary to protect sensitive biological resources. Such strategies may include seasonal access restrictions, fencing or barriers, signage and public education, enforcement of leash and dog-control requirements, establishment of appropriate buffers between development and habitat areas, and monitoring programs to detect and address disturbance to sensitive species.

Where appropriate, the DEIR should describe how management of adjacent open space and coastal habitats will be coordinated with BCER land managers, CDFW, and the U.S. Fish and Wildlife Service. The DEIR should also identify the entity responsible for long-term implementation of management measures and monitoring programs and describe any adaptive management framework that would address increased recreational pressures or unanticipated human-wildlife conflicts associated with Project development.

5. Impacts to Resident and Migratory Birds (Pacific Flyway). Given the Project's location on the Pacific Flyway, CDFW recommends the following design elements be

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incorporated into the DEIR as part of the Project's mitigation considerations for biological resources:

a) Bird-building Collision. The Project lies within a major migratory corridor used by shorebirds and other species traveling between coastal habitats including BCER. Taller structures and reflective glass facades may disrupt established flight paths and substantially increase bird-building collisions. The DEIR should thoroughly evaluate collision risk under multiple buildout scenarios, including maximum allowable heights under the proposed amendment. The DEIR should also analyze the proximity of proposed development to BCER and potential impacts to coastal movement patterns. Building height alternatives should be considered, including standards for prioritizing low-rise structures to minimize disruption of migratory flight paths. Cumulative impacts to the migratory flyway in combination with other coastal development should also be discussed in the DEIR.

b) Glass walls or windows. The DEIR should analyze risks associated with extensive glazing or reflective glass, specifically where development interfaces with open space and sensitive habitats along property edges. Recent studies conducted at the Golden Gate Park in San Fransico, California found that larger paned windows had almost 17 times higher strike rates per unit glass than small paned windows along the California Academy of Sciences building (Kahle et al. 2016).

   Similarly, the experience at the Brightwater development in Huntington Beach is directly relevant. Following its development in 2005, significant bird strikes were documented along a glass wall facing the Bolsa Chica wetlands. The Orange County Register reported on the issue (*Glass wall killing refuge birds*) and subsequent mitigation efforts implemented to reduce bird mortality (*Builder will add decals on glass wall to help birds*). These examples demonstrate that untreated reflective glass adjacent to habitat can cause substantial mortality.

   Because this Project site lies directly on the coastline within the Pacific Flyway and directly adjacent to BCER, the DEIR should provide analysis and discussion of bird strike risk associated with large reflective windows as.

   The analysis should consider;

   i. Expected strike rates under different building designs;

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ii. Alternatives that reduce glazing or limit glass curtain walls, particularly along the western edge of the site; and

iii. Bird-safe design treatments.

The DEIR should also require pre-and post-construction monitoring and incorporate adaptive management measures and collision thresholds to trigger said measures.

c) Noise. Noise monitoring conducted for other environmental reviews near BCER has documented average noise levels of approximately 70-75dB, with occasional peak noise levels of 90–94 dBA during vehicle acceleration or overhead jet flights (Aspen Environmental Group 2000; Environmental Science Associates 2023). These noise levels exceed commonly used thresholds for wildlife protection, which often recommend that construction noise near sensitive habitats and nesting birds not exceed approximately 65 dBA.

The DEIR should disclose this baseline condition of the ambient noise environment and compare how additional construction noise may potentially impact sensitive wetland birds and nesting species in nearby habitats.

6. Impacts to Sensitive Habitat from Artificial Light. The NOP states all outdoor lighting would be designed to provide adequate illumination of on-site areas without intruding upon surrounding properties or sensitive land uses in the Project site vicinity and outdoor lighting would be directed downward and would be DarkSkys approved for all nighttime hours. To reduce impacts to migratory birds on the Pacific Flyway, CDFW recommends the DEIR include a mitigation measure which requires the City to adopt an artificial light policy and/or mitigate the impacts of artificial light as part of the Final Restoration Plan. Artificial light at night (ALAN) is increasing in extent and intensity across the globe. It has been shown to interfere with animal sensory systems, orientation, and distribution, with the potential to cause significant ecological impacts (Barrientos et al. 2023). ALAN also causes changes in reproductive timing or success of birds in response to light leading to phenological mismatches and lower fitness (Barrientos et al. 2023). The impacts of light pollution also cause responses from biodiversity that include advance of spring leaf budding in deciduous trees, inhibition of mating insects under artificial light, wildlife shifts to darker/brighter areas where perceived predation risk is lower, and avoidance of lit wildlife crossings by mammals

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creating a barrier effect for linear infrastructure (Barrientos et al. 2023). The issue of light pollution and the associated impacts to wildlife should be considered when planning for construction of paved and un-paved trails and sidewalks for recreation and access within the Project site due to its inclusion and adjacency to Central/Coastal NCCP/HCP.

General Comments

1. Disclosure. The DEIR should provide an adequate, complete, and detailed disclosure about the effects of the project which a proposed project is likely to have on the environment (Pub. Resources Code, § 20161; CEQA Guidelines, § 15151). Such disclosure is necessary so CDFW may provide comments on the adequacy of proposed avoidance, minimization, or mitigation measures, as well as assess the significance of the specific impact relative to plant and wildlife species impacted (e.g., current range, distribution, population trends, and connectivity).

2. Project Description and Alternatives. To enable adequate review and comment on the proposed Project from the standpoint of the protection of fish, wildlife, and plants, CDFW recommends the following information be included in the DEIR.

    a) A complete discussion of the purpose and need for, and description of the proposed Project.

    b) A range of feasible alternatives to the Project location to avoid or otherwise minimize direct and indirect impacts on sensitive biological resources and wildlife movement areas. CDFW recommends the City select Project designs and alternatives that would avoid or otherwise minimize direct and indirect impacts on biological resources. CDFW also recommends the City to consider establishing appropriate setbacks from sensitive and special status biological resources. Setbacks should not be impacted by ground disturbance or hydrological changes from any future Project-related construction, activities, maintenance, and development. As a rule, CDFW recommends reducing or clustering a development footprint to retain unobstructed spaces for vegetation and wildlife and provide connections for wildlife between properties and minimize obstacles to open space.

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c) Project alternatives should be thoroughly evaluated, even if an alternative would impede, to some degree, the attainment of the Project objectives or would be more costly (CEQA Guidelines, § 15126.6). The DEIR shall include sufficient information about each alternative to allow meaningful evaluation, public participation, analysis, and comparison with the proposed Project (CEQA Guidelines, § 15126.6).

d) Where the Project may impact aquatic resources, CDFW recommends the City select Project designs and alternatives that would fully avoid impacts to such resources. CDFW also recommends an alternative that would not impede, alter, or otherwise modify existing surface flow, watercourse and meander, and water-dependent ecosystems and natural communities.

3. Biological Baseline Assessment. An adequate biological resources assessment should provide a complete assessment and impact analysis of the flora and fauna within and adjacent to the Project site and where the Project may result in ground disturbance. The assessment and analysis should place emphasis on identifying endangered, threatened, rare, and sensitive species; regionally and locally unique species; and sensitive habitats. An impact analysis will aid in determining the Project's potential direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts. CDFW also considers impacts to SSC a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures. The DEIR should include the following information.

a) Information on the regional setting is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region (CEQA Guidelines, § 15125(c)). The DEIR should include measures to fully avoid and otherwise protect Sensitive Natural Communities. CDFW considers Sensitive Natural Communities as threatened habitats having both regional and local significance. Natural communities, alliances, and associations with a State-wide rarity ranking of S1, S2, and S3 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting the

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Vegetation Classification and Mapping Program - Natural Communities webpage[3].

b) A thorough, recent, floristic-based assessment of special status plants and natural communities following CDFW's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities*[4]. Adjoining properties should also be surveyed where direct or indirect Project effects could occur, such as those from fuel modification, herbicide application, invasive species, and altered hydrology. Botanical field surveys should be conducted in the field at the times of year when plants will be both evident and identifiable. Usually, this is during flowering or fruiting. Botanical field survey visits should be spaced throughout the growing season to accurately determine what plants exist in the Project site. This usually involves multiple visits to the Project site (e.g., in early, mid, and late season) to capture the floristic diversity at a level necessary to determine if special status plants are present.

4. Direct and Indirect Impacts on Biological Resources. The DEIR should provide a thorough discussion of direct and indirect impacts expected to affect biological resources with specific measures to offset such impacts. The DEIR should address the following.

a) A discussion of potential impacts from lighting, noise, temporary and permanent human activity, and exotic species, and identification of any mitigation measures. A discussion regarding Project-related indirect impacts on biological resources. These include resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a Natural Community Conservation Plan (Fish & G. Code, § 2800 et. seq.)). The DEIR should fully analyze and disclose potential effects to surrounding coastal and wetland habitats, habitat quality, and ecological function.

[3] https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities
[4] https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline

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b) A discussion of both the short-term and long-term effects of the Project on species population distribution and concentration, as well as alterations of the ecosystem supporting those species impacted (CEQA Guidelines, § 15126.2(a)).

c) Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in areas adjacent to the Project, should be fully analyzed and discussed in the DEIR.

d) A discussion of post-Project fate of drainage patterns, surface flows, and soil erosion and/or sedimentation in streams and water bodies. The discussion should also address the potential water extraction activities and the potential resulting impacts on habitat supported by the groundwater. Measures to mitigate such impacts should be included.

e) An analysis of impacts from proposed changes to land use designations and zoning, and existing land use designation and zoning located nearby or adjacent to natural areas that may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the DEIR.

5. Cumulative Impacts. Cumulative impacts on biological resources can result from projects which are individually insignificant but collectively significant. "The Project, when considered collectively with prior, concurrent, and probable future projects, may have a significant cumulative effect on biological resources. These include not only development projects but also upstream infrastructure improvements, channel modifications, water management activities, habitat restoration initiatives, and ministerial or maintenance projects that may incrementally alter habitat conditions over time.

   Accordingly, CDFW recommends the DEIR thoroughly evaluate the Project's potential contribution to cumulative impacts on biological resources in the context of prior and proposed development and infrastructure improvements, as well as other transportation, utility, or drainage projects. Even where such projects are intended to improve hydraulic performance, public safety, or habitat conditions, their combined effects—together with the Project—may influence hydrology, sediment transport, habitat connectivity, species movement corridors, and the viability of sensitive biological communities.

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The Project may have the potential to substantially reduce the number or restrict the range of endangered, rare, or threatened species. Species that may be impacted by the Project include, but are not limited to, the biological resources described in this letter. The DEIR should assess whether incremental or temporary habitat loss, fragmentation, hydrologic changes, or construction disturbance, when combined with other projects, could cumulatively diminish habitat function or wildlife movement. The City's conclusions regarding the significance of the Project's cumulative impact should be justified and supported by evidence to make those conclusions (CEQA Guidelines section § 15130(a)(2)).

6. Mitigation Measures. Public agencies have a duty under CEQA to prevent significant, avoidable damage to the environment by requiring changes in a project through the use of feasible alternatives or mitigation measures (CEQA Guidelines, §§ 15002(a)(3), 15021). Pursuant to CEQA Guidelines section 15126.4, an environmental document shall describe feasible measures which could mitigate impacts below a significant level under CEQA. Mitigation measures must be feasible, effective, implementable, and fully enforceable/imposed by the lead agency through permit conditions, agreements, or other legally binding instruments (Pub. Resources Code, § 21081.6(b); CEQA Guidelines, § 15126.4).

    a) The DEIR should provide mitigation measures that are specific and detailed (i.e., responsible party, timing, specific actions, location) in order for a mitigation measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097).

    b) If a proposed mitigation measure would cause one or more significant effects, in addition to impacts caused by the proposed Project, the DEIR should include a discussion of the effects of proposed mitigation measures (CEQA Guidelines, § 15126.4(a)(1)). In that regard, the DEIR should provide an adequate, complete, and detailed disclosure about the Project's proposed mitigation measure(s). Adequate disclosure is necessary so CDFW may assess the potential impacts of proposed mitigation measures.

7. Use of Native Plants and Trees. CDFW recommends the City require the Project Applicant to provide a native plant palette for the Project. The Project's landscaping plan should be disclosed and evaluated in the DEIR for potential impacts on biological

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resources such as natural communities adjacent to the Project site (e.g., introducing non-native, invasive species). CDFW supports the use of native plants for the Project, especially considering the Project's location adjacent to protected open space and natural areas. CDFW strongly recommends avoiding non-native, invasive species for landscaping and restoration, particularly any species listed as 'Moderate', 'High', 'Limited', and 'Watch' by the California Invasive Plant Council[5] CDFW supports the use of native species found in naturally occurring plant communities within or adjacent to the Project site. In addition, CDFW supports planting native species of trees, such as oaks (Quercus genus), when appropriate, and understory vegetation (e.g., ground cover, vines, subshrubs, and shrubs) that create habitat and provide a food source for birds. CDFW recommends retaining any standing, dead, or dying tree (snags) where possible because snags provide perching and nesting habitat for birds and raptors. Finally, CDFW supports planting species of vegetation with high insect and pollinator value.

Environmental Data

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to CNDDB. The CNDDB website[6] provides directions regarding the types of information that should be reported and allows on-line submittal of field survey forms.

In addition, information on special status native plant populations and sensitive natural communities, should be submitted to CDFW's Vegetation Classification and Mapping Program using the Combined Rapid Assessment and Relevé Form[7].

The City should ensure data collected for the preparation of the DEIR is properly submitted.

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[5] https://www.cal-ipc.org/plants/inventory/
[6] https://wildlife.ca.gov/Data/CNDDB
[7] https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit

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Filing Fees

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

Conclusion

CDFW appreciates the opportunity to comment on the NOP to assist the City of Huntington Beach in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Paola Perez, Environmental Scientist, at (858) 354- 2413 or Paola.Perez@wildlife.ca.gov.

Sincerely,

Signed by:
Glen Lubcke
AD7D070BCB66466...

Glen M. Lubcke
Environmental Program Manager
South Coast Region

ec: California Department of Fish and Wildlife
Glen M. Lubcke, Environmental Program Manager
Jennifer Turner, Senior Environmental Scientist (Supervisor)
Melissa Borde, BCER Land Manager
Paola Perez, Environmental Scientist

United States Fish and Wildlife Service
Christine Medak, Fish and Wildlife Biologist

Office of Planning and Research
State.Clearinghouse@opr.ca.gov

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