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10/5/2026

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SUBJECT: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PALM/ GOLDENWEST SPECIFIC PLAN AMENDMENT PROJECT, SCH NO. 2026020245, SAN DIEGO COUNTY, CA

Dear Joanna Cortez:

The California Department of Fish and Wildlife (CDFW) reviewed the Draft Environmental Impact Report (DEIR) from the 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].

CDFW previously provided comments on the Notice of Preparation for the Project on March 23, 2026. Thank you for the opportunity to provide comments and recommendations regarding Project activities that may affect California fish and wildlife.

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

[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.

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.

PROJECT DESCRIPTION SUMMARY

Proponent: 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:

[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."

- 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 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.

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 Bolsa 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)
- Belding's savannah sparrow (*Passerculus sandwichensis beldingi*; CESA-listed endangered)
- California least tern (*Sternula 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. April 2026) 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 (*Chloropyron maritimum* ssp. *maritimum*); CNPS Rank 1B.2)

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 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.

CDFW commented on the NOP for the Project in a letter dated March 23, 2026.

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. Additional comments or other suggestions are also included to improve the document.

ADDITIONAL COMMENTS

COMMENT # 1: Reconfiguration of Planned Open Space. California least terns (*Sternula antillarum browni*) are listed as endangered under CESA and the federal Endangered Species Act; they are also fully protected under FGC section 3511(b)(6). Western snowy plovers (*Charadrius nivosus nivosus*) are listed as threatened under the federal Endangered Species Act and are a state species of special concern. The proximity of the Project to the known breeding populations of plovers and terns makes responsible developmental planning crucial to the long-term viability of the local population. Even wildlife populations that select nest sites in highly anthropogenic environments can experience adverse effects of human intrusion in and around these sites (Zuria, et al 2002).

To reduce the potential for future human-wildlife conflict, CDFW recommends reconfiguring the planned Open Space – Parks zoning around the perimeter of the Project site and opt for a larger concentrated open space at the Northwest end of parcel (APN 023-181-54), at the intersection of Seapoint Street and PCH. Buffering the BCER from the proposed commercial and residential would limit overall human activity and the associated sound and light pollution. Furthermore, creating one larger partially-contiguous vegetated area in conjunction with the Open Space – Park designation planned on (APN 023-181-53) increases its overall wildlife habitat value and reduces edge effects accompanied with increased human density in the immediate vicinity. This would assist in moderating the amount of human activity, especially in conjunction with nighttime closures, immediately adjacent to the BCER.

COMMENT # 2: Potential for New CESA-Listed Species. Given that many species have recently been designated as CESA-candidate species, most notably Crotch's bumble bee (*Bombus crotchii*), and western spadefoot (*Spea hammondii*), CDFW wanted to clarify our position regarding new candidate species and existing environmental analysis.

CESA is the state mechanism for designating species currently experiencing severe population declines where there exists a plausible risk of extinction. A petitioned species will undergo review by the California Fish and Game Commission (Commission) which may ultimately designate a species as candidate, threatened, or endangered through the formal listing process (Fish

and G. Code § 2050, *et seq*.). Even candidate species, which are species the Commission has formally acknowledged warrant further review (Fish and G. Code § 2068), are afforded interim protection under CESA.

At a future date, if a new CESA candidate species may be impacted by the Project, additional CEQA analysis of impacts to that species will be required. This is because the biological resource analysis provided in an adopted environmental document is only valid for species that are included in the analysis. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an Incidental Take Permit (ITP) unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP, up to and including a Supplemental EIR.

We acknowledge the City intends to, in accordance with CEQA guidelines, commence additional Project-level environmental analysis once a discretionary project is carried forward; therefore, we encourage the City to preemptively consider possible CESA candidate listings when appropriate to avoid costly and lengthy delays to development. CDFW is available to scope such analysis.

COMMENT # 3: New Mitigation Measures Incorporated. CDFW sincerely appreciates the steps the City has taken to address the concerns that were previously submitted by us via comments for the Notice of Preparation. Per a meeting held with staff familiar with the SPA and the BCER (P. Perez, R. Madrid, and M. Danielczyk) there was consensus that Mitigation Measures added to the Project will work in tandem to ensure safeguards to protected resources during and after construction. We formally acknowledge the City has incorporated several enforceable and actionable Mitigation Measures (DEIR Table 1.A; BIO 1-4) as well as an expanded analysis of cumulative impacts. CDFW is confident these new measures adequately reduce and/ or minimize potential impacts to biological resources.

We look forward to continued coordination to help facilitate this and future projects in an environmentally responsible way that is mutually beneficial for both public agencies, local residents, and the State's biological resources.

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 the California Natural Diversity Database (CNDDB). The CNDDB website[3] provides direction 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[4].

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

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document 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 environmental document filing 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.)

[3] https://wildlife.ca.gov/Data/CNDDB
[4] https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit

CONCLUSION

CDFW appreciates the opportunity to comment on the DEIR to assist the City of Huntington Beach in identifying and mitigating Project impacts on biological resources. CDFW requests an opportunity to review and comment on any response that the City has to our comments and to receive notification of any forthcoming hearing date(s) for the Project (CEQA Guidelines, § 15073(e)).

Questions regarding this letter or further coordination should be directed to Grant Samaniego, Environmental Scientist, at (858) 203-5879 or Grant.Samaniego@wildlife.ca.gov.

Sincerely,

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