

## **CALIFORNIA COASTAL COMMISSION**

NORTH CENTRAL COAST DISTRICT  
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# **W12a**

**A-2-HMB-25-0017 (Vidovich SFD)**

**August 13, 2025**

**CORRESPONDENCE**

From: [John Rossi](#)  
To: [NorthCentralCoast@Coastal](mailto:NorthCentralCoast@Coastal); [Cooper.Isobel@Coastal](mailto:Cooper.Isobel@Coastal)  
Subject: Public Comment on August 2025 Agenda Item Wednesday 12a - Appeal No. A-2-HMB-25-0017 (2800 Champs Elysee Boulevard SFD, Half Moon Bay)  
Date: Monday, July 28, 2025 12:18:51 PM

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July 28, 2025

Re: Wednesday, Item 12a- Appeal No. A-2-HMB-25-0017

Dear Isobel and Commissioners:

I respectfully submit this supplemental appeal regarding the above-referenced Coastal Development Permit decision. On June 3, 2025, the local record closed without consideration of important biological evidence adjacent to 2800 Champs Élysée.

As a relatively new resident of 2804 Champs Elysee, I observed the endangered San Francisco garter snake along Pullman Ditch approximately two years ago. At the time, I did not realize I should report such sightings, so this documentation was not entered into the record before the hearing. However, under Coastal Act Section 30240, the confirmed presence of a State- and Federally-listed species triggers Environmentally Sensitive Habitat Area (ESHA) protections regardless of vegetation or hydrology thresholds.

I ask the Commission to accept this observation into the administrative record through the Coastal Commission appeal process, recognize Pullman Ditch as ESHA, and require appropriate buffers, setbacks, and mitigation measures.

We respectfully request that the Commission find that Appeal A-2-HMB-25-0017 raises a substantial issue under Section 30625(a) and assume de novo jurisdiction.

Sincerely,

John Rossi

From: [Joe Farrell](#)  
To: [NorthCentralCoast@Coastal](#); [Cooper, Isobel@Coastal](#)  
Subject: Re: Public Comment on August 2025 Agenda Item Wednesday 12a - Appeal No. A-2-HMB-25-0017 (2800 Champs Elysee Boulevard SFD, Half Moon Bay)  
Date: Tuesday, July 29, 2025 10:33:53 AM

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Re: Appeal of (2800 Champs Élysée, CCC Appeal No. A-2-HMB-25-0017) – Corrections

Dear Isobel and Commissioners,

Please note two corrections to my July 27 supplemental comment for Appeal No. **A-2-HMB-25-0017**:

1. The Coastal Trail vehicular-access road closure occurred in **2020**, not 2018.
2. The correct Appeal Number is **A-2-HMB-25-0017** (it was mis-typed previously).

All other facts, arguments, and requested corrective actions remain unchanged.

Thank you for updating the record accordingly.

Respectfully,

Joe Farrell  
Appellant, **CCC Appeal No. A-2-HMB-25**

On Jul 27, 2025, at 3:45 PM, Joe Farrell <jfarrellhmb@gmail.com> wrote:

In the earlier email attachment A that was to be included wasn't attached. Please find attachment A below:

**Exhibit A: WWTP Billing Data (FY 2018–2025)**

Respectfully  
Joe Farrell  
[jfarrellhmb@gmail.com](mailto:jfarrellhmb@gmail.com)  
650.954.7862

On Sun, Jul 27, 2025 at 2:55 PM Joe Farrell <[jfarrellhmb@gmail.com](mailto:jfarrellhmb@gmail.com)> wrote:

**Subject:** Preliminary/Supplemental Comment – Appeal A-2-HMB-17-055

Dear Ms. Cooper,

Per your invitation to submit supplemental information ahead of the August 13 substantial-issue determination hearing (Appeal No. A-2-HMB-17-055), I offer the following clarifications. From the start, this appeal has turned on two intertwined problems: the unpermitted grading and fill at 2800 Champs Elysée during the rainy season, Monterey Cypress tree removal—which altered natural sheet-flow patterns and contributed to the 2018 closure of the beach parking-lot access road—and the ongoing flooding, ESHA buffer breaches, and stormwater impacts on neighboring homes. Commission staff rightly recommended a substantial-issue finding in May 2014 on these grounds, and the record since then confirms the validity of those concerns.

If the Commission elects to commission an independent peer review of the April 2025 Schaaf & Wheeler Flood Impact Study (which evaluates runoff solely from the 0.68-acre Champs parcel), we request that the review include additional data elements. We do not want the Champs site to suffer the same fate as its neighbors, nor do we want the new development to exacerbate flooding of our homes or the

beach parking-lot access road. Because the City Council did not have Rocket Farms' invoice data (Exhibit A) or the wastewater treatment plant (WWTP) bypass logs in the record, the current study could not capture the real-world flows impacting the parcel.

For clarity, we request that the Commission find a substantial issue under Section 30625(a) and assume de novo jurisdiction to ensure full review and corrective measures for the documented ESHA buffer breaches, unpermitted grading, and ongoing flooding impacts. We are not asking the Commission to regulate WWTP operations or enforce upstream stormwater permits; rather, we simply want to ensure that this project's on-site drainage design fully accounts for any off-site flows that actually impact the 0.68-acre Champs parcel.

Specifically, please consider incorporating:

#### **Additional Information**

- WWTP Billing Data (Exhibit A): Rocket Farms' treatment-plant invoices for FY 2018–2025, showing zero-billing months in Sept/Oct 2021 and a 59.6 % drop in Dec 2021—strong indicators of bypass events.
- Sanitary-bypass data availability: Instruct the peer reviewer to obtain WWTP Supervisory Control and Data Acquisition (SCADA) bypass logs for September 2021–January 2022 directly from the plant operator (or City records) and incorporate those volumes into the flood model.
- Adjacent stormwater runoff: Pathways and volumes from nearby land uses, particularly Rocket Farms' greenhouses and other impervious areas.
- Realistic storm modeling: Use NOAA Atlas 14 temporal distributions for both the December 13, 2021 (5.38") event and the more frequent moderate storms that routinely flood neighboring properties.

Because the WWTP invoice anomalies and bypass logs were **never before raised or considered** by the City Council or in the staff report, they constitute new, material information under Section 30625(a).

To be clear, this request is strictly about ensuring the project's own detention basins and grading prevent flooding of the 0.68-acre site—it does **not** seek any new regulation of Pullman Ditch or neighboring properties.

Including these elements will help confirm whether the proposed drainage design truly meets the “no net increase” runoff standard (Coastal Act §30251) and protects downstream public access.

We respectfully request that the Commission find that Appeal A-2-HMB-17-055 raises a substantial issue under Section 30625(a) and assume de novo jurisdiction.

Warm regards,  
Joe Farrell and John Rossi

Appellants, A-2-HMB-17-055