

January 23, 2003

Mr. Ron Metzler
Shea Homes
603 South Valencia Avenue
Brea, California 92823

Subject: Disturbance by Agricultural Tenant on Shea Homes Property in the County of Orange

Dear Mr. Metzler:

This letter provides supplemental information to be used in your application for a Coastal Development Permit (CDP), specifically with respect to the actions of your agricultural tenant on the subject property. The information on the quantity and area of disturbance was prepared by your engineer for the proposed residential development and relayed to LSA Associates, Inc. (LSA) by you. The information about the project effects on vegetation is based on LSA's numerous site visits and wetland delineation work conducted over the past few years. LSA's assessment of the impacts to vegetation is also based on the more recent site visits, which included one visit shortly after LSA was notified of the disturbance (late December 2002) and another visit with representatives of the California Coastal Commission (CCC) (January 9, 2003). The first section below can be applied to Section II of the CDP application, which addresses a description of the proposed development. The next section provides LSA's recommendation concerning remedial actions.

CDP APPLICATION SECTION II, PROPOSED DEVELOPMENT

Item 2: Description

On or about December 13, 2002, a farmer with Orange County Produce LLC reportedly plowed an approximately 1-foot-deep and 14-foot-wide ditch extending from the City of Huntington Beach property boundary to the edge of the wetlands on the County of Orange parcel. Orange County Produce contends that the ditch was created to allow for the drainage of the adjacent farmlands where standing water accumulates following heavy storm events. The soil material from the excavated ditch was spread out across the surface of the adjoining undeveloped area at a depth ranging from one to six inches (see attached graphic). The vegetation affected by this ground disturbance consisted almost entirely of upland ruderal forbs and nonnative grasses. This work was not authorized under a CDP at the time of the activity; however, no CCC jurisdictional wetlands were impacted as a result of the disturbance. Only a few scattered individuals of common woody pickleweed (*Salicornia*

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virginica) were run over, but the rootstock appeared to be undisturbed and left intact. Therefore, these obligate hydrophytes are expected to come back on their own without any intervention.

Item 11: Type and Area of Other Vegetation Removed

As determined from previous vegetation mapping conducted by LSA in April 2002, which included the areas of disturbance, the vegetation removed during the excavation of the ditch consisted primarily of upland ruderal (weedy) forbs and nonnative grasses. The area of disturbance where vegetation was removed was approximately 0.8 acre. The dominant ruderal forbs included mallow (*Malva* sp.); Oriental sisymbrium (*Sisymbrium orientale*); Russian thistle (*Salsola tragus*); common knotweed (*Polygonum arenastrum*); red-stemmed filaree (*Erodium cicutarium*); and the only hydrophyte, five-hook bassia (*Bassia hyssopifolia*, FAC). The dominant nonnative grasses included wild oats (*Avena* sp.); brome (*Bromus* spp.); littleseed canary grass (*Phalaris minor*); hare barley (*Hordeum murinum* ssp. *leporinum*); and the only two hydrophytic grasses, Bermuda grass (*Cynodon dactylon*, FAC) and Nuttall's monolepis (*Monolepis nuttalliana*, FACW). Hydrophytic vegetation is not prevalent throughout the areas of disturbance, and CCC jurisdictional wetlands were not affected by the unpermitted disturbance.

REMEDIAL ACTION

In LSA's opinion, no remedial action is necessary for the temporary agricultural disturbance. The area where the spoils from the plowed ditch were spread is quickly becoming revegetated with the same species that were present in that area prior to the disturbance. Vegetation in the ditch itself is expected to develop more slowly, because the bulk of the seed bank was removed from that area. Nevertheless, it will naturally revegetate, and the grade of the ditch is so slight (nearly flat) that LSA does not expect any erosion or sediment transport to occur.

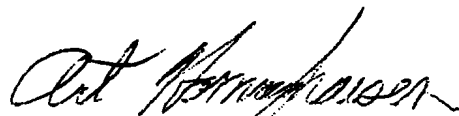
Of course, LSA would recommend that any future grading of the buffer area between the proposed residential development and the adjacent wetland area be carefully revegetated with appropriate native upland species. However, LSA does not believe that anything would be gained at this time by implementing an interim revegetation program.

Sincerely,

LSA ASSOCIATES, INC.

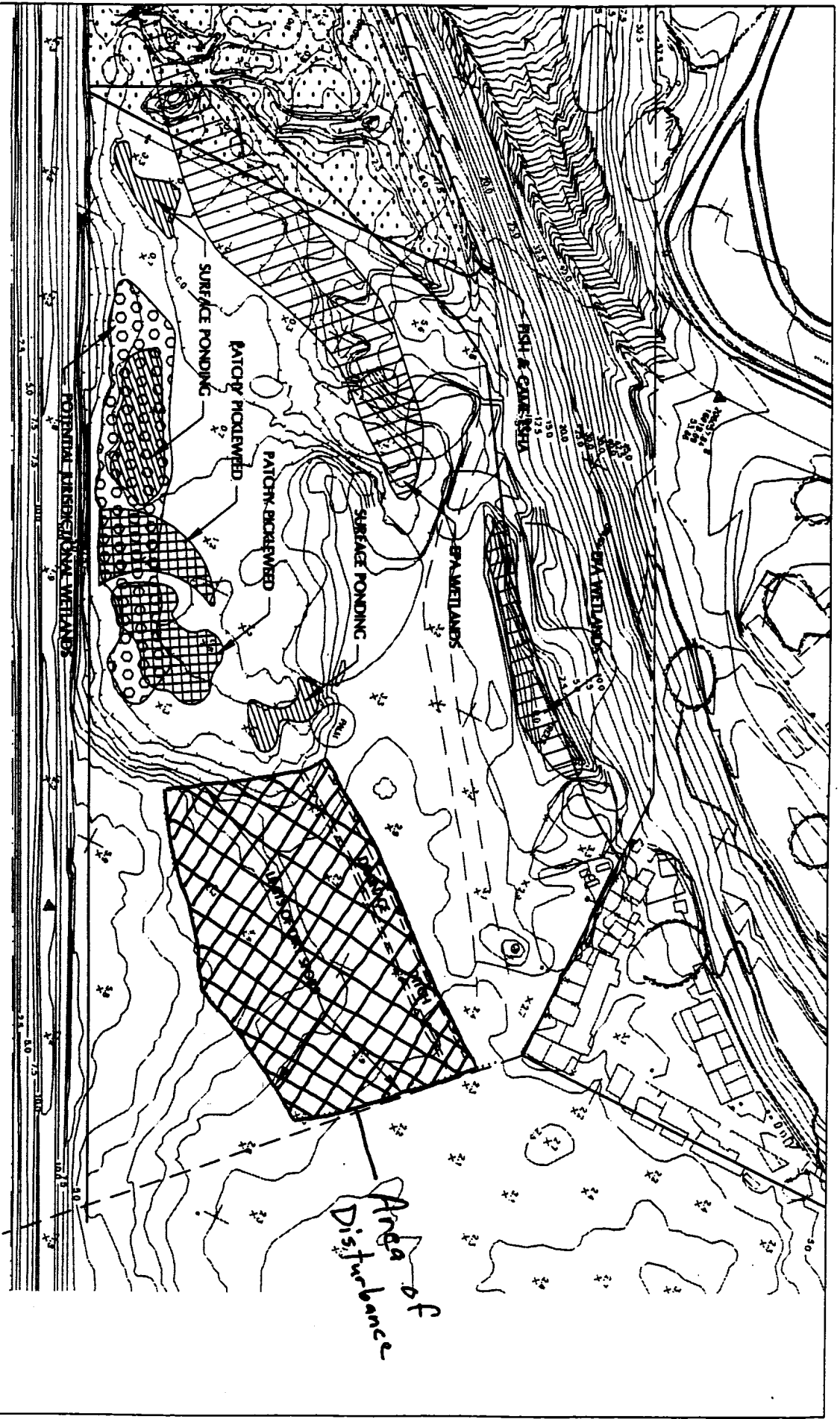


Jim Harrison
Associate, Botanist








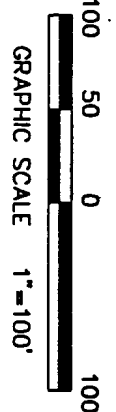
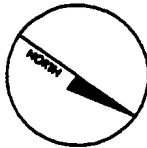
Art Homrighausen
Principal

Attachment



LEGEND

-  FISH & GAME ESHA (JUNE 3, 1982)
-  EPA WETLANDS (1989)
-  PATCHY PICKLEWEED (FRANK HOVARE 1997)
-  AREA OF POTENTIAL JURISDICTIONAL WETLANDS (USA MAY 21, 2002)
-  AREA OF SURFACE PONDING (USA MAY 21, 2002)



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**COMPOSITE RESOURCE MAP
 FOR COUNTY PARCEL**