



February 26, 2002

VIA U.S. MAIL AND FACSIMILE

Pat Fitzgerald
Project Manager
Wavecrest Village L.L.C.
330 Purissima Street
Half Moon Bay, CA 94019

RE: A-1-HMB-99-051, Wavecrest Village Project, Wetland Investigation

Dear Mr. Fitzgerald:

The Commission biologist, John Dixon, has expressed concern that he is having difficulty obtaining wetland study field data from Michael Josselyn of Wetland Research Associates (WRA) as previously agreed upon as part of the Wavecrest Village Wetland Study Plan. As we have been unsuccessful in reaching you by telephone, despite having left several messages since Friday, I am writing at this point in the hope of quickly resolving this issue. As discussed below, obtaining the data in question in a timely manner is vital to the successful completion of the field work contemplated by the Study Plan.

You will recall that you met with Dr. Josselyn, Dr. Huffman, and Dr. Dixon on December 20, 2001 at the Coastal Commission office in San Francisco and discussed plans for a field study of wetland characteristics in vegetation areas 18 and 19 at the Wavecrest project site. At the meeting, you agreed on the basic outline of the necessary work and that WRA was to conduct the field work. As planned, following the meeting Dr. Dixon and Dr. Josselyn exchanged written field protocols and agreed on a Study Plan, dated December 24, 2001, for the field work. A copy of this Study Plan is attached hereto for your reference.

Among other things, the agreed-upon field protocol called for assessing the initial data, which was to include a map with polygons around ponded areas and around patches of vegetation where any of the dominant species are wetland plants. The protocol further called for altering the study plan based on the mapped polygons and initial data collected if the data suggested that changes would improve the design.

The first formal sample was collected Friday, January 11, 2002, and, with one exception, sampling has been on a weekly Friday schedule since then. WRA provided Dr. Dixon with data for the January 11 and 18, 2002 samples shortly after collection with a map showing the sample points, but the map did not include polygons of wetland vegetation and ponds. As a result, it has not been possible to assess the adequacy of the sampling plan as contemplated by the field

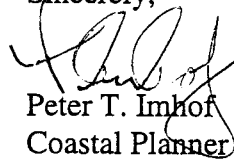
protocol. Dr. Dixon requested maps with these polygons on January 17 and 26, 2002, and again on February 1 and 15, 2002 in emails addressed to Michael Josselyn and copied to you. On February 20, Dr. Dixon spoke to Dr. Josselyn by telephone and asked about the maps. Dr. Josselyn informed Dr. Dixon that he was not at liberty to talk about the content of the maps, or even whether the maps had been made, and that all queries for information should be directed to you.

The absence of the requested mapping information seriously compromises the interpretation of the data that are being collected and reduces the likelihood of accurately delineating any wetlands that may exist on the site. According to Dr. Dixon, if the ponded areas and patches of wetland plants are not carefully mapped and the resulting maps provided to us promptly, assessing the appropriateness of the sample locations will not be possible. If it is not possible to assess the location of the sample points, the scientific basis for the delineation will be put in question. Dr. Dixon notes that while the vegetation can be mapped anytime during the spring, the ponds are dynamic and will eventually disappear.

Ideally, these maps should have been made during early January following the heavy December rains, so that remaining dry areas could be ruled out as likely wetland locations. However, in the event that WRA has not yet mapped wetland vegetation and ponded areas, it remains critical to the wetland delineation that it be done now. We therefore formally request that all mapping data collected to date be provided promptly to Dr. Dixon. Alternatively, in the event that no mapping data has yet been collected, we request that the perimeters of ponded areas and areas of predominantly wetland vegetation be mapped as soon as possible and the resulting data be provided promptly to Dr. Dixon. In the latter event, to avoid any later misunderstandings, we suggest that mapping methodology be worked out cooperatively by Dr. Josselyn, Dr. Huffman, and Dr. Dixon, which Dr. Dixon indicates could be done very quickly.

Thank you for your prompt attention to this request and please call me at (415) 904-5268 or District Supervisor Chris Kern at (415) 904-5266 if you have any questions.

Sincerely,



Peter T. Imhof
Coastal Planner

North Central Coast District

cc: Dr. John Dixon
Commission Biologist

Dr. Michel Josselyn
Wetland Research Associates

Dr. Terry Huffman
Huffman & Associates

STUDY PLAN: POLYGON 18 AND 19
WAVECREST VILLAGE SITE
December 24, 2001

The purpose of this Study Plan is to provide a procedure by which certain areas identified within Polygons 18 and 19 as described in the Vegetation Study completed for the Wavecrest Village Property will be re-examined for potential LCP/Coastal Commission wetlands. The study methodology was developed during a meeting on December 20, 2001 between Michael Josselyn, Wetlands Research Associates; Terry Huffman, Huffman and Associates; John Dixon, California Coastal Commission; and Pat Fitzgerald, Wavecrest Village.

The additional study of these two polygons will be conducted as follows:

1. Within Vegetation Areas 18 and 19, vegetation patches where one of the dominant species ($\geq 20\%$ cover) is FACW or OBL (e.g., *Mentha*, *Juncus phaeocephalus*, or *Eleocharis*), and areas of ponded water or obviously saturated soils will be mapped using GPS with sub meter accuracy. The vegetation polygons will be walked in a systematic manner in order to locate these areas. The vegetation within the mapped areas will be characterized as to percent cover by species. Known wetlands will also be sampled for comparison at the time of sampling.
2. During the first field observation period, the site will be walked in a series of parallel transects approximately 20 meters apart. In addition to taking soil samples in and/or near identified patches of vegetation or ponded water, soil samples will be taken at uniform intervals¹ within an orthogonal grid that covers Vegetation Areas 18 and 19. Samples will be taken to a depth of 12-16 inches using an auger or shot-coring device. During the first survey, soil samples will be hand-textured to estimate the proportions of sand, silt, and clay. The soil samples will be opened to determine if soil saturation is occurring within the soil profile and the depth to which that saturation is occurring. The soil will be considered saturated if water can be extruded by gently squeezing a fresh soil sample or if water is seeping from the walls of the borehole. In addition, it may be possible to determine whether the source of water is from surface rainfall or from deeper groundwater by examining soil from different depths from the core. This will also enable one to determine if the water is confined to shallow depths or if it moves downward with time. If ponded water is present, the depth of that water will be measured. Known wetlands in the Central Area should also be sampled for comparison at the time of sampling.
3. The results of the first survey will be summarized and at least the point locations of the surveyed vegetation patches or ponded or saturated areas will be mapped. This summary and a proposed plan for future surveying will be completed within one week

¹ The number of samples to be taken will be determined by field conditions; however, sufficient number will be collected to thoroughly characterize conditions within Polygons 18 and 19.

by WRA and sent to Terry Huffman and John Dixon. Josselyn, Huffman, and Dixon will discuss the first survey and agree to a plan for future work. The intent is to develop a consensus plan prior to the second survey. If that is not possible, WRA will conduct the second survey using best professional judgment, and the consensus plan will be initiated with the third survey.

4. Surveys will be conducted at 7-day intervals until the CCC has acted on the development proposal for this area. During subsequent field visits and using information collected in Step 2, a number of permanent sample stations will be established. It is expected that these sample stations will cover both *Mentha* dominated areas, any other OBL/FACW dominated areas, and areas dominated by FAC grasses. A sufficient number of stations will be established to cover the range of conditions observed in Polygon 18 and 19. It is anticipated that between 20 and 40 sample stations may be established. As the study progresses, any new areas of ponded water will be mapped. Known wetlands in the Central Area should also be sampled for comparison at the time of sampling.
5. At each survey, including the first, soil samples will also be taken at and near the identified wetlands directly west of Areas 18 and 19. This will provide a useful reference for later interpretation of the field data.
6. Rainfall will be recorded daily from a station located in Half Moon Bay.
7. If appropriate and as an option, □□ dipyrnyl will also be used to examine the presence of reduced iron in the soil. The applicability of this method will be tested by examining soils in known wetland areas (polygon 10), known non-wetland areas, and within the areas in question within polygon 18 and 19.
8. If appropriate and as an option, piezometers may also be installed and compared to results from groundwater wells already installed at the site.
9. All data will be recorded on standardized datasheets and supplied to the Commission along with a report that will include an analysis of the data. A draft report will be completed by February 1st unless some other date is mutually agreed to. Mapping will be at a scale of 1 in = 100 ft. The report will be submitted as a hard copy and in electronic format. Text will be in MS Word 6.0 format. Maps will be submitted as Arcview files which include separate layers for topography, data collection locations, locations of previous vegetation samples, vegetation polygons, polygons for areas with ponded water or saturated soils, and any wetland boundaries.