



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549-7010

**VIA FACSIMILE AND U.S. MAIL**

March 19, 2009

Michael D. Grubbs  
Senior Vice President and Chief Financial Officer  
William Lyon Homes  
4490 Von Karman Avenue  
Newport Beach, California 92660

**RE: William Lyon Homes  
Form 10-K for Fiscal Year Ended December 31, 2007  
Forms 10-Q for Fiscal Quarters Ended March 31, 2008, June 30, 2008  
and September 30, 2008  
File No. 1-31625**

Dear Mr. Grubbs:

We have completed our review of your Form 10-K and related filings and have no further comments at this time.

If you have any further questions regarding our review of your filings, please direct them to Ernest Greene, Staff Accountant, at (202) 551-3733 or in his absence, Jeanne Baker, Assistant Chief Accountant, at (202) 551-3691.

Sincerely,

Rufus Decker  
Accounting Branch Chief