

**CEASE AND DESIST ORDER NO. CCC-06-CD-14 AND
RESTORATION ORDER NO. CCC-06-RO-07**

1.0 CEASE AND DESIST ORDER CCC-06-CD-14

Pursuant to its authority under Public Resources Code (hereinafter, "PRC") Section 30810, the California Coastal Commission (hereinafter, "Commission") hereby authorizes and orders Malibu Valley Farms, Inc., all its employees, agents, and contractors, and any persons acting in concert with any of the foregoing (hereinafter, "Respondent") to do the following, provided however, not more than 60 days from issuance of these Orders (unless the Executive Director makes the determination that additional water quality studies cannot be completed within this timeframe) Respondent shall submit a complete CDP application to the South Central Coast District office requesting: a) retention of the existing development, b) removal of the existing development and proposing new development, or c) some combination thereof:

A. Cease and desist from maintaining unpermitted development (as described in Section 5.0, below) on the portions of a 31.02-acre parcel identified in Section 4.0 below that are in the Coastal Zone (hereinafter, "subject property" - approximately 28 acres of the 31.02 acre parcel),

B. Cease and desist from conducting any further unpermitted development on the subject property,

C. Remove all unpermitted development from the subject property, and

D. Restore the subject property by complying with the requirements of these Cease and Desist and Restoration Orders (hereinafter, "Orders") as described herein.

- 1.1 If a complete CDP application is not received within 60 days from issuance of these Orders (unless the Executive Director makes the determination that additional water quality studies cannot be completed within this timeframe) or if Respondent either withdraws the application or otherwise prevents it from coming to a hearing as per the Commission staff planned hearing schedule, Respondent shall remove all unpermitted development and restore these areas consistent with these Orders, set forth herein. Moreover, in the event that the Commission denies all or any part of such application, Respondent shall remove all unpermitted development, and restore these areas in the same manner and timeframes consistent with these Orders set forth herein.

2.0 RESTORATION ORDER CCC-06-RO-07

Pursuant to its authority under PRC Section 30811, the Commission hereby orders and authorizes the following, provided however, no more than 60 days

from issuance of these Orders (unless the Executive Director makes the determination that additional water quality studies cannot be completed within this timeframe) Respondent shall submit a complete CDP application to the South Central Coast District office requesting: a) retention of the existing development, b) removal of the existing development and proposing new development, or c) some combination thereof. If a complete CDP application is not received within 60 days from issuance of these Orders (unless the Executive Director makes the determination that additional water quality studies cannot be completed within this timeframe) or if Respondent either withdraws the application or otherwise prevents it from coming to a hearing as per the Commission staff planned hearing schedule, Respondent shall remove all unpermitted development and restore these areas consistent with these Orders, set forth herein. Moreover, in the event that the Commission denies all or any part of such application, Respondent shall remove all unpermitted development, and restore these areas in the same manner and timeframes consistent with these Orders set forth below.

2.1 REMOVAL PLAN

A. Within 15 days of the issuance of these Orders, submit a Removal Plan, for the review and approval of the Executive Director, for removal of all unpermitted development on the property, including but not limited to: the equestrian facility on the subject property which, in turn, includes, but is not limited to: 1) a 45,000 sq. ft. arena with a five-foot high surrounding wooden wall with posts, 2) a 25,200 sq. ft. riding arena, 3) numerous storage containers, 4) numerous portable tack rooms, 5) numerous pipe corrals and covered shelters, 6) an approximately 2,000 sq. ft. parking area, 7) a 2,660 sq. ft. breeding facility, 8) a 1,440 sq. ft. one-story barn, 9) railroad tie walls, 10) an approximately 20,000 sq. ft. fenced paddock, 11) all fencing throughout the subject property, 12) graded dirt access roads 13) two at-grade crossings through Stokes Creek, 14) two 2,025 sq. ft. covered corrals and one 1,080 sq. ft. covered corral, 15) and all other unpermitted structures and imported soil/sand on the subject property. Removal of non-native landscaping shall be addressed in the Restoration Plan, Section 2.4, below.

B. The Removal Plan must be prepared by a certified civil engineer or other equivalently qualified professional, licensed by the State of California and must contain the following provisions:

a. A detailed description of proposed removal activities.

b. A timetable for removal.

c. The location of a disposal site for removed material. The site must be a licensed disposal facility authorized to accept such material. If the disposal site is located in the Coastal Zone and is not an existing sanitary landfill, a

Coastal Development Permit shall be required. Any hazardous materials must be transported to a licensed hazardous waste disposal facility in compliance with all applicable laws.

C. If mechanized equipment is used, the Removal Plan must contain the following provisions:

- a. Type of mechanized equipment required for removal activities;
- b. Length of time equipment must be used;
- c. Routes utilized to bring equipment to and from the property;
- d. Storage location for equipment when not in use during removal process;
- e. Hours of operation of mechanized equipment;
- f. Contingency plan in case of a spill of fuel or other hazardous release from use of mechanized equipment that addresses clean-up and disposal of the hazardous materials and water quality concerns;
- g. Measures to be taken to protect water quality of Stokes Creek and areas that drain into it.

D. The Removal Plan shall indicate that removal shall commence no later than 10 days after the approval of the Removal Plan by the Executive Director. The Removal Plan shall be fully implemented and all work shall be consistent with the terms of the final approved plan, including that removal shall be completed according to the time schedule provided in the approved plan. Thereafter, Respondent shall restore the Subject Property in accordance with Sections 2.2 and 2.4, below

E. Within 10 days of completion of the removal (such date being established by the time schedule provided in the approved Removal Plan), Respondent shall submit, for the review and approval of the Executive Director, a report documenting the complete removal of the unpermitted development specified in Section 5.0. The report shall include plans showing the location of all removed development from the Subject Property and photographs that clearly show all portions of the Subject Property, the locations of which are annotated to a copy of the plans required by Section 2.4.

2.2 RESTORATIVE GRADING PLAN

A. Within 15 days of the issuance of these Orders, Respondent shall submit a Restorative Grading Plan, for the review and approval of the Executive Director. The Restorative Grading Plan shall demonstrate that the topography of the

Subject Property in the location of the two at-grade, graded stream crossings will be restored to the condition that existed prior to the unpermitted development. The Restorative Grading Plan shall indicate that fill material shall be removed from the stream channel and the banks of the stream shall be restored to a natural contour, consistent with the stream bank on the upstream and downstream side. The Restorative Grading Plan shall include sections showing existing, unpermitted grades and finished grades, and quantitative breakdown of grading amounts (cut/fill), drawn to scale with contours that clearly illustrate 1) the existing topography of the subject property caused by the grading disturbance and fill in the location of the two crossings of Stokes Creek and 2) the restored contours. The Restorative Grading Plan shall also demonstrate that restoration of the subject property will create a successful riparian stream course similar to a natural, undisturbed stream that as closely as possible restores the original topography of the subject property to the condition that existed prior to the unpermitted activity.

B. The Restorative Grading Plan shall indicate that measures shall be taken to ensure that erosion from the area subject to re-grading activities does not enter into Stokes Creek, consistent with Section 2.3.

C. The Restorative Grading Plan shall indicate that the location for any excavated material to be removed from the site as a result of the restorative grading of the impacted areas shall be identified. If the disposal site is located in the Coastal Zone and is not an existing sanitary landfill, a Coastal Development Permit shall be required.

D. The Restorative Grading Plan shall indicate that restorative grading shall commence no later than 10 days after the approval of the Removal Plan by the Executive Director. Restorative grading shall be completed according to the time schedule and fully implemented in accordance with the terms of final, approved Restorative Grading Plan. Thereafter, Respondent shall restore the subject property in accordance with Sections 2.4, below.

E. Within 10 days of completion of the restorative grading (such date being established by the time schedule provided in the approved Restorative Grading Plan), Respondent shall submit, for the review and approval of the Executive Director, a report documenting the completion of the Restorative Grading. The report shall include plans showing the location of all graded areas on the Subject Property and photographs that clearly show all portions of the Subject Property included in the Restorative Grading, the locations of which are annotated to a copy of the plans required by Section 2.4.

2.3 EROSION CONTROL PLAN

A. Within 15 days of the issuance of these Orders, Respondent shall submit, for the review and approval of the Executive Director, an Erosion Control Plan. The

Erosion Control Plan shall be prepared by a qualified restoration ecologist or resource specialist and shall demonstrate that no erosion and dispersion of sediments across the Subject Property via rain, nuisance flow runoff, or wind will occur during the removal of unpermitted development, during restorative grading, or during implementation of the revegetation plans.

B. The Erosion Control Plan shall specify the erosion control measures that shall be installed on the Subject Property prior to or concurrent with the removal and grading actions required by Sections 2.1 and 2.2 and maintained until the impacted areas have been revegetated, consistent with Section 2.4, to minimize erosion and transport of sediment outside of the disturbed areas.

C. The Erosion Control Plan shall indicate that temporary erosion control measures, including but not limited to the following, shall be used: temporary hay bales, silt fences, swales, sand bag barriers, wind barriers, and biodegradable erosion control material. In addition, all stockpiled material shall be covered with geofabric covers or other appropriate cover and all graded areas shall be covered with geotextiles or mats.

D. The Erosion Control Plan shall include, at a minimum, 1) a narrative describing and identifying all erosion control measures to be used, 2) detailed site plan showing the location of all temporary erosion control measures, and 3) a schedule for installation and removal of temporary erosion control measures, in coordination with the long-term restoration of the subject property.

E. The Restorative Grading Plan shall indicate that erosion control measures shall be provided at all times of the year for at least three years or until the revegetation described in Section 2.4 has been established, whichever occurs first, and then shall be removed or eliminated by Respondent.

F. Upon approval of the Erosion Control Plan, Respondent shall implement the Erosion Control Plan subsequent to or concurrent with undertaking the Removal and Restorative Grading Plans.

G. Within 10 days of implementation of the Erosion Control Plan (such date being established by the time schedule provided in the approved Erosion Control Plan), Respondent shall submit, for the review and approval of the Executive Director, a report documenting the completion of the measures required in the Erosion Control Plan. The report shall include plans showing the location of all erosion control measures on the Subject Property and photographs that clearly show all portions of the Subject Property included in the restoration, the locations of which are annotated to a copy of the plans required by Section 2.4.

2.4 REVEGETATION PLAN

A. Within 15 days of the issuance of these Orders, Respondent shall submit, for the review and approval of the Executive Director, a Revegetation Plan that demonstrates that the areas impacted by the construction or removal of unpermitted development on the subject property will be restored using planting of species endemic to this portion of the Santa Monica Mountains. The Revegetation Plan shall include all graded areas and areas impacted by the unpermitted development (hereinafter "Planting Area") and demonstrate that the disturbed areas will have a similar plant density, total cover and species composition to that typical of an undisturbed riparian area in the Santa Monica Mountains within 5 years from the initiation of revegetation activities.

B. The Revegetation Plan shall identify the natural habitat type that is the model for the restoration and describe the desired relative abundance of particular species in each vegetation layer. Based on these goals, the plan shall identify the species that are to be planted (plant "palette"), and provide a rationale for and describe the size and number of container plants and the rate and method of seed application. The Revegetation Plan shall indicate that plant propagules should come from local native stock. If plants, cuttings, or seed are obtained from a nursery, the nursery must certify that they are of local origin and are not cultivars and the Revegetation Plan shall provide specifications for preparation of nursery stock (e.g., container size & shape to develop proper root form, hardening techniques, watering regime, etc.). Technical details of planting methods (e.g., spacing, micorrhizal inoculation, etc.) shall also be included.

C. The Revegetation Plan shall be prepared by a qualified restoration ecologist or resource specialist and include a plan showing the type, size, and location of all plant materials that will be planted in the Planting Area, all invasive and non-native plants to be removed from the Planting Area, the topography of the site, all other landscape features, and a schedule for installation of plants and removal of invasive and/or non-native plants.

D. The Revegetation Plan shall include a plan for weed eradication, which shall include the following: 1) after restoration takes place, weeding should be monthly and shall impose a zero tolerance on non-native, invasive species; 2) weeding shall occur at this frequency and care until the native vegetation is sufficiently well-established to resist continued colonization by exotics; and 3) weeding shall be done by hand and must be supervised by a restoration biologist to ensure that the native plants are not disturbed.

E. The Revegetation Plan shall show all existing vegetation on the subject property. The vegetation planted on the subject property shall consist only of native, non-invasive plants endemic to Santa Monica Mountains vegetative communities. The Revegetation Plan shall demonstrate that all non-native vegetation within the areas subject to revegetation and those areas that are

identified as being subject to disturbance as a result of the unpermitted development and restoration and revegetation activities, are eradicated. The Revegetation Plan shall identify that all non-native plant species are removed from the Planting Area prior to any restorative grading or revegetation activities on the subject property.

F. The Revegetation Plan shall include specific ecological and erosion control performance standards that relate logically to the restoration and revegetation goals. Where there is sufficient information to provide a strong scientific rationale, the performance standards shall be absolute (e.g., a specified percentage ground cover or relative diversity of species, or a specified average height for a species).

G. Where absolute performance standards cannot reasonably be formulated, clear relative performance standards will be specified. Relative standards are those that require a comparison of the restoration site with reference sites. The performance standards for the plant density, total cover and species composition shall be relative. In the case of relative performance standards, the rationale for the selection of reference sites, the comparison procedure, and the basis for judging differences to be significant will be specified. Reference sites shall be located on adjacent areas vegetated with riparian species undisturbed by development or vegetation removal, within 2000 feet of the subject property with similar slope, aspect and soil moisture. If the comparison between the revegetation area and the reference sites requires a statistical test, the test will be described, including the desired magnitude of difference to be detected, the desired statistical power of the test, and the alpha level at which the test will be conducted. The design of the sampling program shall relate logically to the performance standards and chosen methods of comparison. The sampling program shall be described in sufficient detail to enable an independent scientist to duplicate it. Frequency of monitoring and sampling shall be specified for each parameter to be monitored. Sample sizes shall be specified and their rationale explained. Using the desired statistical power and an estimate of the appropriate sampling variability, the necessary sample size will be estimated for various alpha levels, including 0.05 and 0.10. The basis for the selection of each performance criterion shall also be explained.

H. The Revegetation Plan shall describe the use of artificial inputs, such as watering or fertilization that may be used to support the establishment of the plantings and specify that only the minimal necessary amount of such inputs are used. The Revegetation Plan shall not include permanent irrigation system on the subject property. Temporary above ground irrigation to provide for the establishment of the plantings is allowed for a maximum of three years or until the Revegetation has become established, whichever occurs first. If, after the three-year time limit, the revegetation has not established itself, the Executive Director may allow for the continued use of the temporary irrigation system until

such time as the revegetation is established. All irrigation infrastructures must be removed by the end of the monitoring period described in Section 2.4.K.

I. All planting in the approved Revegetation Plan shall be installed in accordance with the schedule and requirements of the approved Revegetation Plan and no later than 15 days after the completion of the components of the Restorative Grading Plan or Removal Plan. The Revegetation shall be planted using accepted planting procedures required by the restoration ecologist or resource specialist. Such planting procedures may suggest that planting would best occur during a certain time of the year. If so, and if this necessitates a change in the planting schedule, the 15 day deadline to implement the Revegetation Plan may be extended as provided for under the provisions of Section 10.0, herein.

J. Consistent with Section 2.3, the Revegetation Plan shall specify the methods to be used after planting has occurred to stabilize the soil and make it capable of supporting native vegetation. Such methods shall not include the placement of retaining walls or other permanent structures, grout, geogrid or similar materials. Any soil stabilizers identified for erosion control shall be compatible with native plant recruitment and establishment.

K. The Revegetation Plan shall describe the monitoring and maintenance methodology and shall include the following provisions:

a. Respondent shall submit, on an annual basis for a period of five years from the date of implementation of the Revegetation Plan (no later than December 31st of each year) a written report, for the review and approval of the Executive Director, prepared by a qualified resource specialist, evaluating compliance with the approved Revegetation Plan. The annual reports shall include further recommendations and requirements for additional restoration activities in order for the project to meet the objectives of the Revegetation Plan. These reports shall also include photographs taken annually from the same pre-designated locations (annotated to a copy of the site plans) indicating the progress of recovery in the Planting Area.

b. At the end of the five-year period, Respondent shall submit a final detailed report prepared by a qualified resource specialist for the review and approval of the Executive Director. If this report indicates that the restoration project has in part, or in whole, been unsuccessful, based on the approved Revegetation Plan, Respondent shall submit a revised or supplemental plan to compensate for those portions of the original program that were not successful within 30 days of the Executive Director's determination that the restoration was unsuccessful. The Executive Director will determine if the revised or supplemental revegetation plan must be processed as a CDP, a new Restoration Order, or a modification of these Orders.

L. Immediately following the complete removal of all unpermitted development and recontouring of the disturbed banks of Stokes Creek to its pre-violation condition and no later than 10 days after implementation of the Restorative Grading Plans, Respondent shall implement the Revegetation Plan

M. Within 15 days of the implementation of the Revegetation Plan, Respondent shall submit to the Executive Director a report documenting the project's completion. The report shall include photographs that clearly show the entire revegetated area on the Subject Property. The report shall also include a statement by the professionally licensed restoration ecologist or resource specialist indicating that the Revegetation Plan has been implemented and describing the success of the plantings.

2.5 RESTORATION MANAGER

A qualified individual who will be personally responsible for all phases of the restoration shall be identified by name as the restoration manager. Different phases of the restoration shall not be assigned to different contractors without onsite supervision by the restoration manager. The restoration manager shall be a qualified restoration biologist.

2.6 GOALS AND PERFORMANCE STANDARDS

A. Restoration of the subject property shall consist of removal of all unpermitted development, re-grading of the banks of Stokes Creek that were damaged by the two at-grade stream crossings, and revegetation of all areas on the subject property impacted by the unpermitted development. Revegetation shall consist of native plant species endemic to this portion of the Santa Monica Mountains, and shall include riparian vegetative plant communities. The restoration shall also include eradication of non-native vegetation in areas impacted by the unpermitted development.

B. The revegetation required in the restoration shall include riparian plant species throughout all areas that are designated as riparian habitat by the restoration ecologist. Appropriate oak woodland, chaparral, and coastal sage scrub plant species shall be planted around the riparian area as a transitional zone between the riparian areas and the upland sloped areas east of Stokes Creek and the alluvial plain areas west of Stokes Creek.

C. The goal of the restoration shall include revegetation of all graded areas, areas impacted by the unpermitted development, and areas impacted by removal of major vegetation so that disturbed areas have a similar plant density, total cover and species composition as that typical of undisturbed chaparral vegetation in the surrounding area within 5 years from the initiation of revegetation activities.

D. Measures shall be taken to aerate the soil impacted by unpermitted activity prior to any revegetation pursuant to Section 2.4. Erosion control measures shall be implemented consistent with Section 2.3.

2.7 Appendix A of the Plans required in Section 2.0 shall include a description of the education, training and experience of the qualified restoration ecologist, civil engineer, and/or resource specialist who shall prepare the Plans required in 2.0. A qualified restoration ecologist for this project shall be an ecologist, biologist, or botanist who has experience successfully completing restoration or revegetation of riparian habitats and oak woodlands/chaparral. If this qualified restoration ecologist does not have experience in creating the soil conditions necessary for successful revegetation of riparian vegetation and oak woodlands/savannah, a qualified soil scientist shall be consulted to assist in the development of the conditions related to soils in the Revegetation and Monitoring Plan. A qualified soil scientist for this project shall be a soil scientist who has experience in assessing, designing, and implementing measures necessary to create soil conditions to support revegetation and prevent instability or erosion. A qualified civil engineer for this project shall be an engineer who has experience in removal of large structures adjacent to riparian areas.

2.8 All plans, reports, photographs and any other materials required by these Orders shall be sent to:

California Coastal Commission
Headquarters Enforcement Program
Attn: Aaron McLendon
45 Fremont Street, Suits 2000
San Francisco, California 94105
Facsimile (415) 904-5235

With a copy sent to:
California Coastal Commission
South Central Coast District
Attn: Tom Sinclair
89 S. California Street, Suite 200
Ventura, CA 93001
Facsimile (805) 641-1732

2.9 If the Executive Director determines that any modifications or additions to the submitted Plans under 2.0 are necessary, he shall notify Respondent. Respondent shall complete the requested modifications and resubmit the Removal Plan for approval within 10 days of the notification.

3.0 PERSONS SUBJECT TO THESE ORDERS

The persons subject to these Orders are Malibu Valley Farms, Inc., its employees, agents, contractors, and anyone acting in concert with the foregoing.

4.0 IDENTIFICATION OF SUBJECT PROPERTIES

The property that is the subject of these Orders are located at all portions of a 31.02-acre parcel which are in the Coastal Zone (approximately 28 acres of the 31.02 acre parcel) at the northeast corner of Mulholland Highway and Stokes

Canyon Road in the Santa Monica Mountains area of unincorporated Los Angeles County, Assessor's Parcel Number 4455-028-04.

5.0 DESCRIPTION OF COASTAL ACT VIOLATION

The unpermitted development consists of: grading and vegetation removal and the construction of an extensive, approximately six-acre equestrian facility without any Coastal Development Permits. The equestrian facility includes, but is not limited to, 1) a 45,000 sq. ft. arena with a five-foot high surrounding wooden wall with posts, 2) a 25,200 sq. ft. riding arena, 3) numerous storage containers, 4) portable tack rooms, 5) numerous pipe corrals and covered shelters, 6) an approximately 2,000 sq. ft. cleared and paved parking area, 7) a 2,660 sq. ft. breeding facility, 8) a 1,440 sq. ft. one-story barn, 9) railroad tie walls, 10) an approximately 20,000 sq. ft. fenced paddock, 11) various fencing throughout the property, 12) graded dirt access road with at-grade crossing through Stokes Creek and a second at-grade dirt crossing of Stokes Creek, 13) two 2,025 sq. ft. covered corrals and one 1,080 sq. ft. covered corral, 14) grading, and 15) removal of major vegetation and ESHA throughout the Subject Property.

6.0 COMMISSION AUTHORITY TO ACT

The Commission is issuing these Orders pursuant its authority under Sections 30810 and 30811 of the Public Resources Code.

7.0 FINDINGS

These Orders are being issued on the basis of the findings adopted by the Commission on November 15, 2006, as set forth in the foregoing document entitled: STAFF RECOMMENDATIONS AND FINDINGS FOR CEASE AND DESIST AND RESTORATION ORDERS, and Exhibits thereto.

8.0 EFFECTIVE DATE

These Orders shall become effective as of the date of issuance by the Commission and shall remain in effect permanently unless and until rescinded by the Commission.

9.0 COMPLIANCE OBLIGATION

Strict compliance with the terms and conditions of these Orders is required. If the Respondent fails to comply with the requirements of these Orders, including any deadline contained herein, it will constitute a violation of these Orders and may result in the imposition of civil penalties of up to six thousand dollars (\$6,000) per day for each day in which compliance failure persists, in addition to

any other penalties authorized under Chapter 9 of the Coastal Act, including exemplary damages under Section 30822.

10.0 EXTENSIONS OF DEADLINES

If the Executive Director determines that the Respondent has made a showing of good cause, he/she shall grant extensions of the deadlines contained herein. Any extension requests must be made in writing to the Executive Director and received by the Commission staff at least 10 days prior to the expiration of the subject deadline.

11.0 SITE ACCESS

Respondent shall provide Commission staff and staff of any agency having jurisdiction over the work being performed under these Orders with access to the subject property at all reasonable times. Nothing in these Orders are intended to limit in any way the right of entry or inspection that any agency may otherwise have by operation of any law. The Commission and other relevant agency staff may enter and move freely about the following areas: (1) the portions of the subject property on which the violations are located, (2) any areas where work is to be performed pursuant to these Orders or pursuant to any plans adopted pursuant to these Orders, (3) adjacent areas of the property, and (4) any other area where evidence of compliance with these Orders may lie, as necessary or convenient to view the areas where work is being performed pursuant to the requirements of these Orders or evidence of such work is held, for purposes including but not limited to inspecting records, operating logs, and contracts relating to the subject property and overseeing, inspecting, documenting, and reviewing the progress of Respondent in carrying out the terms of these Orders.

12.0 APPEALS AND STAY RESOLUTION

Pursuant to Public Resources Code Section 30803(b), the Respondent, against whom these Orders are issued, may file a petition with the Superior Court for a stay of these Orders.

13.0 GOVERNMENT LIABILITY

The State of California shall not be liable for injuries or damages to persons or property resulting from acts or omissions by the Respondent in carrying out activities authorized under these Orders, nor shall the State of California be held as a party to any contract entered into by the Respondent or their agents in carrying out activities pursuant to these Orders.


14.0 GOVERNING LAW

These Orders shall be interpreted, construed, governed and enforced under and pursuant to the laws of the State of California, which apply in all respects.

15.0 NO LIMITATION OF AUTHORITY

Except as expressly provided herein, nothing herein shall limit or restrict the exercise of the Commission's enforcement authority pursuant to Chapter 9 of the Coastal Act, including the authority to require and enforce compliance with this Order.

Issued on the 15th day of November, 2006 in Huntington Beach, California



Peter M. Douglas, Executive Director
California Coastal Commission

12/18/06

Date

