

**CALIFORNIA COASTAL COMMISSION**

SAN DIEGO AREA

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September 23, 1998

**TO: COMMISSIONERS AND INTERESTED PERSONS**

**FROM: DEBORAH LEE, SOUTH COAST DEPUTY DIRECTOR  
SHERILYN SARB, DISTRICT MANAGER, SAN DIEGO AREA OFFICE  
LAURINDA OWENS, COASTAL PROGRAM ANALYST, SAN DIEGO  
AREA OFFICE**

**SUBJECT: STAFF RECOMMENDATION ON MAJOR AMENDMENT #1-98 TO THE  
CITY OF IMPERIAL BEACH'S LOCAL COASTAL PROGRAM  
IMPLEMENTATION PLAN (For Public Hearing and Possible Action at the  
Meeting of October 13-16, 1998)**

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**SYNOPSIS****SUMMARY OF AMENDMENT REQUEST**

The City is proposing to rezone six properties as follows: 1) three beachfront San Diego Unified Port District project sites which are currently zoned High Density Residential (R-1500) with a Mixed Use Overlay (MU-2), to the Public Facility (PF) Zone; 2) a vacant 1.25 acre site on South Seacoast Drive adjacent to the Tijuana National Estuarine Research Reserve from Single-Family (R-1-6000) to Open Space (OS); and, 3) City half-block at Ninth Street and Ebony Avenue from Neighborhood Commercial (C-3) to Medium Density Residential (R-3000).

**SUMMARY OF STAFF RECOMMENDATION**

Staff recommends that, following a public hearing, the Commission approve the proposed revisions to the City of Imperial Beach's Implementation Plan (LCPA/ZCA 98-01), as submitted. The resolution and motion for this action may be found on page 4. The findings for approval of the Implementation Plan Amendment as submitted begin on page 4.

**BACKGROUND**

The City's LCP was certified in late 1984. There have been 13 amendments to the Implementation Plan and four proposed amendments to the Land Use Plan since certification. The most recent major amendment is reviewed under the LCP History in the report. The City is also processing another LCP amendment (No. 2-98) for rezoning

of a property from Residential (R-1-6000) to Commercial (C-2 ) simultaneously with this item for the subject meeting agenda.

### **ADDITIONAL INFORMATION**

Further information on the City of Imperial Beach LCP #1-98 may be obtained from **Laurinda Owens**, Coastal Planner, at (619) 521-8036.

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## **PART I. OVERVIEW**

### **A. LCP HISTORY**

On June 30, 1981, the City of Imperial Beach formally submitted its Land Use Plan (LUP) for Commission approval. The plan, as originally submitted, comprised the City's entire General Plan (10 elements and a policy plan). Since the plan contained a large volume of material that was not coastal-related and policies addressing coastal issues were found throughout many of the elements, staff summarized the coastal policies into one document. This policy summary along with the Land Use Element was submitted to the Commission as the LCP Land Use Plan.

On September 15, 1981, the Commission found substantial issue with the LUP, as submitted, denied and then conditionally approved the LUP with recommended policy changes for all policy groups. The City resubmitted the LCP Land Use Plan in early 1982, incorporating most of the Commission's suggested policy modifications. This included modification language related to the preservation and protection of Oneonta Slough/Tijuana River Estuary and South San Diego Bay, preservation and enhancement of coastal access and the provision for visitor-serving commercial uses in the Seacoast District. On March 16, 1982, the Commission certified the City of Imperial Beach LCP Land Use Plan as submitted. The land use plan was effectively certified by the Commission on November 18, 1982. In 1983, prior to certification of the Implementation Plan, the Commission approved an amendment to the LUP to correct a mapping error.

On August 15, 1983, the City began issuing coastal development permits pursuant to Section 30600.5 (Hannigan provisions) of the Coastal Act based on project compliance with its certified LUP. The City then submitted its entire Zoning Ordinance in order to implement the provisions of the certified Land Use Plan. The zoning ordinance was completely rewritten in order to implement the LUP. On September 26, 1984, the Commission approved the LCP/Implementation Plan as submitted. As of February 13, 1985, the City has been issuing coastal development permits under a certified local coastal program. Subsequent to the Commission's actions on the land use plan and

implementation plan, there have been four amendments to the certified land use plan and 13 amendments to the approved implementation plan.

The most recent major amendment to the City's LCP (Major 1-97C) involved revisions to its municipal code to incorporate changes to the the Seacoast Commercial Zone (C-2 Zone) by expanding the permitted and prohibited uses to specifically allow public parks, public parking lots, kiosks, professional offices, financial institutions, theaters and assemblies, and to prohibit pawn shops. The proposed revisions also include specific requirements for site plan review, conditional use permit review and annual monitoring of permitted professional office and financial institution uses in the C-2 zone. Generally, the amendment would conditionally allow up to 30% of the existing commercial square footage on the ground floor along Seacoast Drive and intersecting residential streets to be developed with professional office and financial institution uses.

#### **B. STANDARD OF REVIEW**

Pursuant to Section 30513 of the Coastal Act, the Commission may only reject zoning ordinances or other implementing actions, as well as their amendments, on the grounds that they do not conform with, or are inadequate to carry out, the provisions of the certified land use plan. The Commission shall take action by a majority vote of the Commissioners present.

#### **C. PUBLIC PARTICIPATION**

The City has held Planning Commission and City Council meetings with regard to the subject amendment request. All of those local hearings were duly noticed to the public. Notice of the subject amendment has been distributed to all known interested parties.

### **PART II. LOCAL COASTAL PROGRAM SUBMITTAL - RESOLUTIONS**

Following a public hearing, staff recommends the Commission adopt the following resolutions and findings. The appropriate motion to introduce the resolution and a staff recommendation are provided just prior to each resolution.

- A. **RESOLUTION** (Resolution to approve certification of the City of Imperial Beach LCP Implementation Plan Amendment #1-98 (LCPA/ZCA 98-01), as submitted)

#### **MOTION**

I move that the Commission reject the City of Imperial Beach Implementation Plan Amendment #1-98, as submitted.

Staff Recommendation

Staff recommends a **NO** vote and adoption of the following resolution and findings. An affirmative vote by a majority of the Commissioners present is needed to pass the motion.

Resolution

The Commission hereby approves certification of the amendment request to the City of Imperial Beach Local Coastal Program on the grounds that, the amendment conforms with, and is adequate to carry out, the provisions of the certified land use plan. There are no feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impacts which the approval would have on the environment.

**PART III. FINDINGS FOR APPROVAL OF THE CITY OF IMPERIAL BEACH  
IMPLEMENTATION PLAN AMENDMENT #1-98, AS SUBMITTED**

**A. AMENDMENT DESCRIPTION**

The proposed amendment request will result in rezoning of various properties in the City of Imperial Beach. Specifically, the zone changes include rezoning three beachfront properties owned by the San Diego Unified Port District to the Public Facility (PF) Zone to reflect existing and proposed public facilities on these parcels (i.e., city's public safety center, pier plaza public restrooms and commercial development and the expansion of Dunes Park.) Another parcel proposed to be rezoned is a 1.25 vacant parcel on the east side of Seacoast Drive adjacent to the Tijuana River National Estuarine Reserve from residential to Open Space (OS). This zone change is designed to reflect the recent acquisition of this parcel for wetlands restoration and its incorporation into the Tijuana Estuary. The last group of rezonings are for properties fronting on Ebony and Ninth Avenue which are currently zoned for Commercial Neighborhood (C-3) to R-3000 Two-family Residential uses. The proposed rezone is designed to reflect residential development that will occur on some of the properties. The Land Use Plan calls for the area to be developed with commercial uses but only if the entire half block is developed with a single development. Since residential development has already been approved on some of the parcels, this has precluded commercial development from comprising the entire half-block and therefore, the rezone will reflect residential use to achieve consistency with the LUP.

**B. FINDINGS FOR CERTIFICATION**

The standard of review for LCP implementation submittals or amendments is their consistency with and ability to carry out the provisions of the certified LUP.

## **1. San Diego Unified Port District Project Sites – Public Facility (PF) Zone**

a) **Purpose and Intent of the Ordinance.** The purpose and intent of the PF zone is to designate land devoted to public facilities and utilities. This designation includes public schools, parks, civic and public parking facilities. All lands under public or quasi-public ownership and land utilized for public recreation purposes may be zoned in the public facilities classification.

b) **Major Provisions of the Ordinance.** The major provisions of the ordinance establish the permitted uses within the zone and the development standards pertaining to building setbacks, lot coverage, building height, parking siting, signs and other standards.

c) **Adequacy of the Ordinance to Implement the Certified LUP Segments.** The proposed changes to this zone essentially result in re-zoning the area from R-1500 High Density Residential (R-1500), with a Mixed-Use Overlay (MU-2) zone to Public Facility (PF) zone. The three properties consist of two beachfront lots at 960 Ocean Lane to Public Facility; a vacant parcel consisting of two lots adjacent to Dunes Park on the north side of Daisy Avenue and a lot located at 926 Ocean Lane (adjacent to Pier Plaza). All three properties are proposed to be rezoned from High Density Residential (R-1500/Mixed Use Overlay (M-U2) to Public Facility (PF). The property at 960 Ocean Lane will be developed with the City's new Public Safety Center. The property at 926 Ocean Lane will be developed with the Pier Plaza restroom/commercial facility. The property adjacent to Dunes Park will accommodate the expansion of Dunes Park, an existing beachfront public park with picnic tables, children's play equipment, restrooms and other amenities.

Although parks are permitted in the R-1500 zone subject to Conditional Use Permits and the Mixed-Use Overlay allows for the gradual commercial expansion in an area which is currently used for commercial purposes, the change from R-1500/MU-2 to the Public Facility (PF) zone will bring the zoning designations and land use classifications into conformity with these public projects without Conditional Use Permit requirements. As such, the PF zone is consistent with and adequate to carry out the Imperial Beach LUP, as recommended for adoption.

## **2. City-owned Property on East side of Seacoast Drive adjacent to Tijuana National Estuarine Reserve – Open Space Zone**

a) **Purpose and Intent of the Ordinance.** The purpose and intent of the Open Space (OS) Zone is to provide land to be set aside for the protection of sensitive and fragile natural resources. This zone is intended to limit and control access and intensity of uses in these areas. This zone applies to the Tijuana River Valley.

b) **Major Provisions of the Ordinance.** The major provisions of the ordinance include criteria for land that is intended to be used in the future for marine and wildlife preserves, permanent open space or landscaped areas, natural resource or environmentally sensitive land, drainage or flood control channels, creeks, rivers, estuaries, watercourses, etc. or other facilities that would fulfill the intent of the ordinance. The ordinance also contains the provisions for permitted uses in this zone through a Conditional Use Permit and requirements for parking, building height and signage.

c) **Adequacy of the Ordinance to Implement the Certified LUP.** The subject property (formerly known as the Napolitano site) was recently acquired by the City due, in part, to funding by the California Coastal Conservancy. The site is currently zoned R-1-6000, Single-Family Residential. Part of the agreement with the City requires that a Management Plan be developed which would establish the restoration, preservation and management of the site in conjunction with the Tijuana River National Estuarine Research Reserve. The proposed rezoning to Open Space will accommodate the preservation of this sensitive natural resource as part of the open space system associated with the Tijuana Estuary. As such, the OS zone is consistent with and adequate to carry out the Imperial Beach LUP, as recommended for adoption.

**3. 1059 Ninth Street and 913 Ebony Avenue; and 909,911 and 915 Ebony Avenue – R-3000 Zone**

a) **Purpose and Intent of the Ordinance.** The purpose and intent of the R-3000 Zone is to provide for the development of detached or attached residential dwelling units on a single lot. Typical of this zone are single-family detached residences or duplexes. The intent of this designation is to provide for a low intensity residential living environment in typically one to two-story units.

b) **Major Provisions of the Ordinance.** The major provisions of the ordinance include the permitted uses and which uses are also permitted, subject to the approval of a conditional use permit. Requirements are also included for yard setbacks, minimum lot size, frontage, building height, separation of buildings, usable open space and landscaping, density, parking and signage, etc.

c) **Adequacy of the Ordinance to Implement the Certified LUP.** The two groups of properties affected by the proposed zone change are: 1) Lots 1-3 at 909, 911 and 915 Ebony Avenue which are proposed to be consolidated into one parcel; and, 2) 1059 Ninth Street and 915 Ebony Avenue which is a consolidation of Lots 4 and 5 and the northerly 15 feet of Lot 6. Both areas are proposed to be rezoned from Neighborhood Commercial (C-3) to R-3000 Two-family Residential. The General Plan calls for commercial development for the entire half-block bounded by 9<sup>th</sup> Street, Imperial Beach Boulevard, Ebony Avenue and the public alley, which includes the subject area, provided that the entire half block is developed with a single commercial project. In lieu of this, the

requirements of the R-3000 zone shall regulate the area. Two parcels in this subject block were recently developed with five detached dwelling units consistent with the R-3000 zoning standards. As such, since the existing residential development has precluded the development of the entire half block with a single commercial development, pursuant to the General Plan, the rezoning of this area to the R-3000 zone would be consistent with the LUP. Consistent with the General Plan, the four remaining parcels within the half-block would be developed in accordance with the R-3000 standards. As such, the R-3000 zone is consistent with and adequate to carry out the Imperial Beach LUP, as recommended for adoption.

#### **PART IV. CONSISTENCY WITH THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)**

Section 21080.5 of the California Environmental Quality Act (CEQA) exempts local government from the requirement of preparing an environmental impact report (EIR) in connection with its local coastal program. Instead, the CEQA responsibilities are assigned to the Coastal Commission and the Commission's LCP review and approval program has been found by the Resources Agency to be functionally equivalent to the EIR process. Thus, under CEQA Section 21080.5, the Commission is relieved of the responsibility to prepare an EIR for each LCP.

Nevertheless, the Commission is required in an LCP submittal or, as in this case, an LCP amendment submittal, to find that the LCP, or LCP, as amended, does conform to CEQA provisions. In the case of the subject LCP amendment, the Commission finds that approval of the subject LCP amendment, as submitted, would not result in significant environmental impacts under the meaning of the California Environmental Quality Act.

All portions of the proposed amendment to the City of Imperial Beach's Implementing Ordinances have been found consistent with and adequate to carry out the policies of the certified land use plan. The proposed amendment will appropriately implements each of the proposed zone designations and existing development on the respective properties. The proposed rezones can thus be found consistent with and adequate to carry out the Imperial Beach LUP.

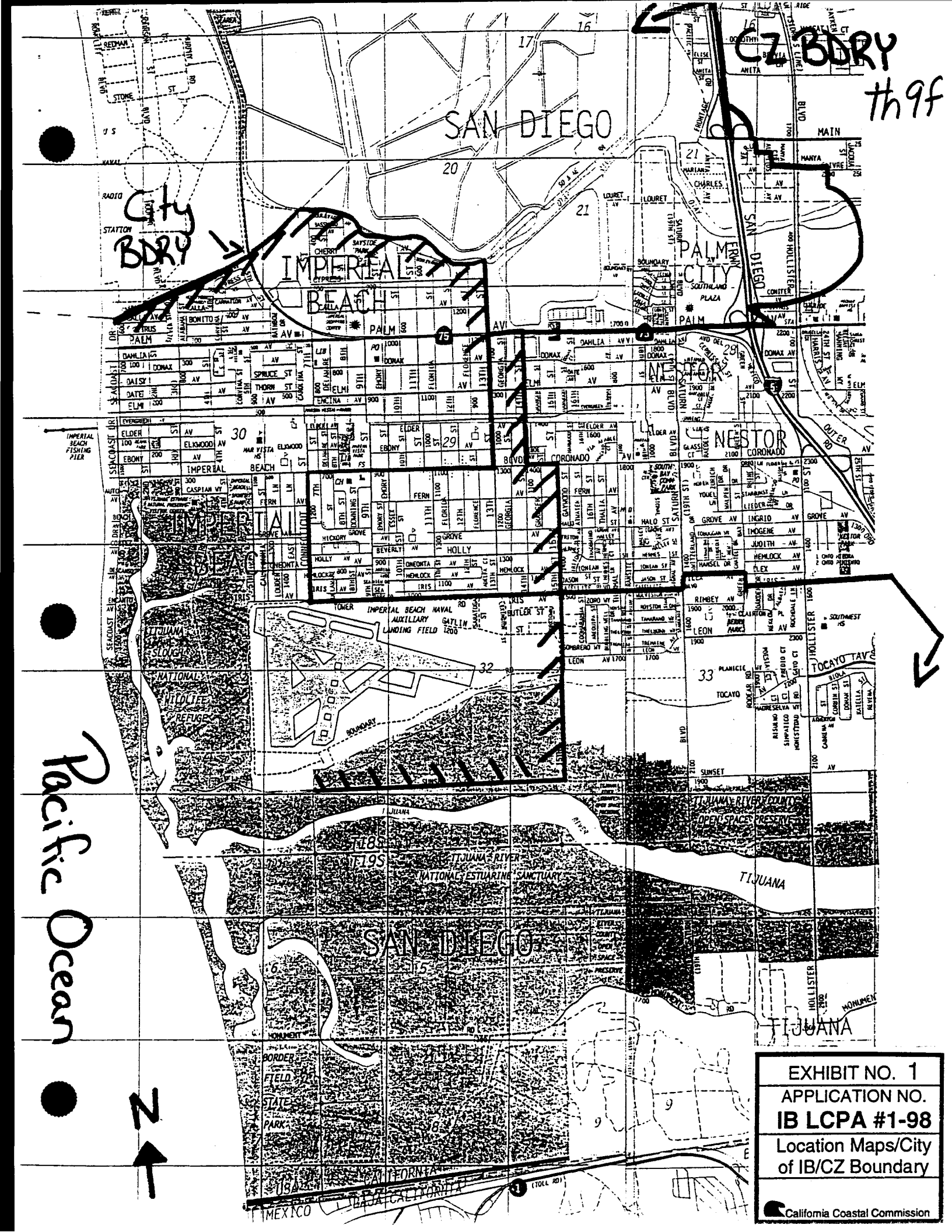
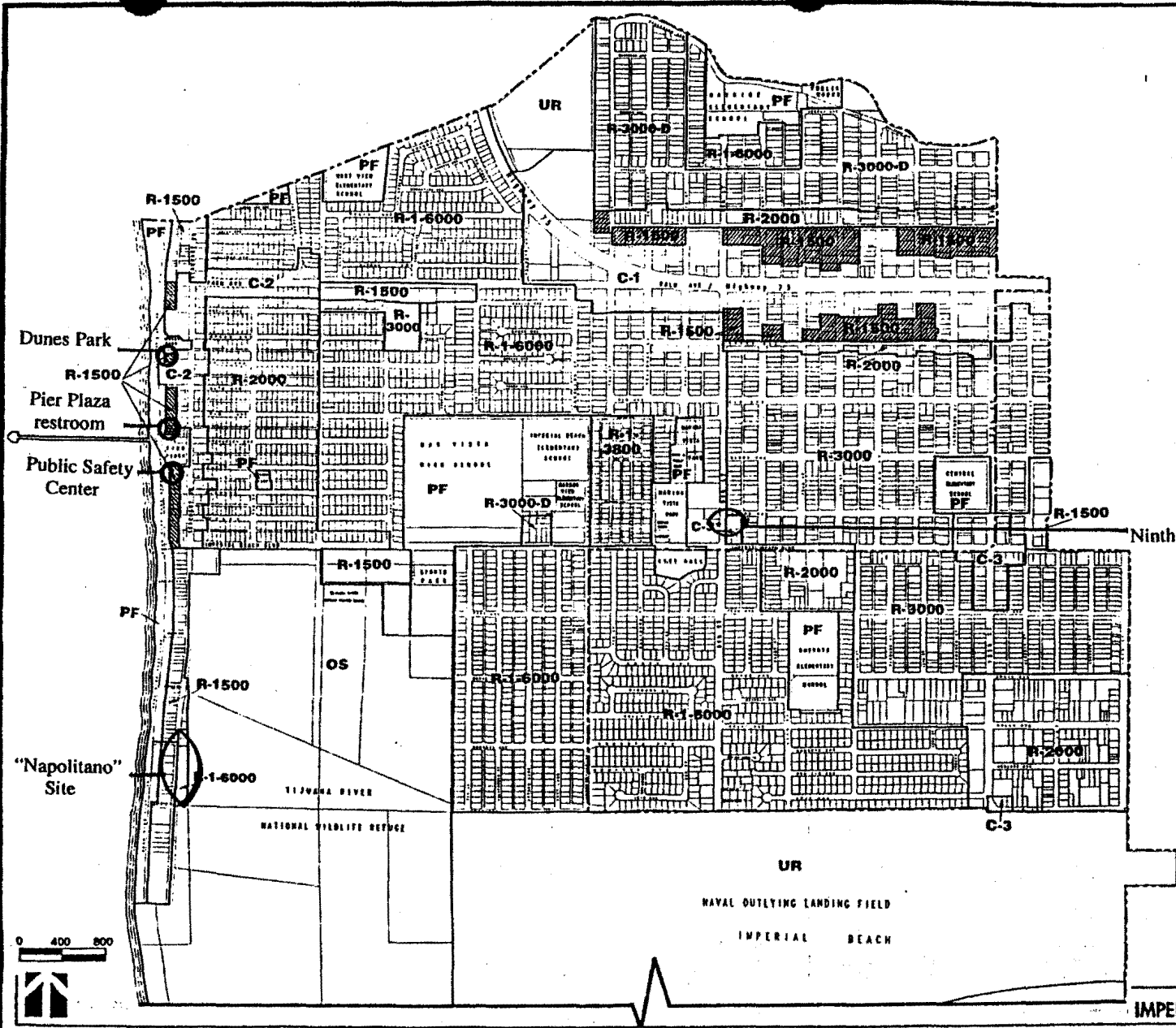


EXHIBIT NO. 1  
APPLICATION NO.  
IB LCPA #1-98  
Location Maps/City  
of IB/CZ Boundary





LEGEND	
R-1-3800	SINGLE FAMILY RESIDENTIAL
R-1-6000	SINGLE FAMILY RESIDENTIAL
R-3000-D	RESIDENTIAL
R-3000	RESIDENTIAL
R-2000	RESIDENTIAL
R-1500	RESIDENTIAL
C-1	GENERAL COMMERCIAL
C-2	SEACOAST COMMERCIAL
C-3*	NEIGHBORHOOD COMMERCIAL
MU-1	MIXED USE
MU-2	MIXED USE
PF	PUBLIC FACILITY
OS	OPEN SPACE
UR	URBAN RESERVE
* See Policy L-4, h	

## ORDINANCE NO. 98-925

AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF IMPERIAL BEACH, CALIFORNIA, AMENDING THE CITY'S GENERAL PLAN/LOCAL COASTAL PLAN (LCPA/ZCA 98-01), TO REZONE CERTAIN PROPERTIES IN THE CITY OF IMPERIAL BEACH.

WHEREAS, on March 18, 1998, the City Council of the City of Imperial Beach adopted Resolution No. 98-4875 declaring its intention to consider the rezoning of certain properties and setting May 20, 1998, as the date of the public hearing; and,

WHEREAS, said properties are legally described in "Exhibit A; and,

WHEREAS, General Plan/Local Coastal Plan/Zone Code Amendment (LCPA/ZCA 98-01) is exempt from the requirements of the California Environmental Quality Act (CEQA) pursuant to Section 15061(b)(3), as it would not, and could not have a significant effect on the environment. The proposed zone reclassifications will reflect existing residential development, public facility projects, and will expand open space in an environmentally sensitive area adjacent to a wetland.

WHEREAS, the City provided notice of the public hearing in accordance with the requirements of Chapter 19.86 of the Municipal Code. A notice of the public hearing was published in a newspaper of general circulation on March 27, 1998, providing the minimum six-week public notice prior to the public hearing that is required for a Local Coastal Program Amendment. Property owners of the subject properties were also notified of the public hearing by individual notice.

WHEREAS, the City Council considered the Staff Report dated May 20, 1998, and public testimony prior to making a determination on the rezoning; and,

WHEREAS, the City Council did exercise its independent judgement as required by Section 21082.1 of the Public Resources Code; and,

WHEREAS, the following findings of fact have been made in regard to the zoning reclassifications:

1. The public necessity, convenience, general welfare and good zoning practice requires the reclassification of said properties. Zoning will be brought into conformance with existing residential developments at Ninth Street and Ebony Avenue. permitted land uses on a vacant parcel adjacent to the Tijuana River estuary will be allowed in accordance with open space regulations, and several public facility projects next to the beach will be incorporated into the adjacent Public Facility Zone.

**EXHIBIT NO. 3****APPLICATION NO.****IB LCPA #1-98****Adopted Ordinance  
LCPA/ZCA 98-01****Page 1 of 9**

**2. The reclassifications of said properties are compatible with the objectives, policies, general land uses and goals specified in the General Plan/Local Coastal Plan**

(California Government Code Section 65860(a). The rezoning of the vacant parcel on Seacoast Drive to OS Open Space is consistent with Policy CO-5 of the Conservation and Open Space Element, which encourages the expansion of the refuge through acquisition of the "Napolitano" parcel. The rezoning of the beachfront properties from R-1500/MU-2 to PF Public Facility is consistent with Goal 11 of the Land Use Element, which recognizes *"The ocean, beach and immediately abutting land are an irreplaceable natural resource to be enjoyed by the entire City and region. This unique narrow strip of land should receive careful recognition and planning. The purpose of the beach is to make available to the people, for their benefit and enjoyment forever, the scenic, natural, cultural and recreational resources of the ocean, beach and related lands."* The rezoning of the two parcels at Ninth Street and Ebony Avenue, from C-3 Neighborhood Commercial to R-3000 Two-family Residential, is consistent with Policy L-4.h of the Land Use Element, which states in part *"Until such time as the area is developed in its entirety for commercial uses, the requirements of the R-3000 zone shall regulate the area."*

3. The reclassifications will not conflict with the City's Housing Element of the General Plan, nor prejudice the ability of the City to meet its share of the regional housing need (California Government Code Section 65863.5). While the reclassification of three beachfront parcels from R-1500/MU-2 to PF Public Facility will reduce the land devoted to high density residential development by approximately 14,800 square feet (representing a maximum density of nine dwelling units), this will be significantly offset by the potential yield of seven dwelling units on 21,000 square feet at Ninth Street and Ebony Avenue with the reclassification from C-3 to R-3000. Furthermore, housing opportunities would remain on the southern portion of the half block (17,500 square feet divided by 3,000 = five dwelling units).

**THE CITY COUNCIL DOES HEREBY ORDAIN AS FOLLOWS:** Ordinance No. 98-925 is hereby introduced, a General Plan/Local Coastal Plan/Zone Code Amendment (LCPA/ZCA 98-01) to amend the zoning of certain properties in the City of Imperial Beach, as follows:

**SECTION 1.**

1. Vacant 1.25 acre parcel on east side of Seacoast Drive, between Encanto and Descanso Avenues and adjacent to the Tijuana River National Estuarine Research Reserve, from R-1-6000 Single-family Residential to OS Open Space.
2. 1059 Ninth Street and 915 Ebony Avenue, from C-3 Neighborhood Commercial to R-3000 Two-family Residential.

3. 909, 911 and 915 Ebony Avenue, from C-3 Neighborhood Commercial to R-3000 Two-family Residential.
4. Vacant parcel on Ocean Lane, legally described as Lots 6 and 7 of Block 3 according to Map 1071, from R-1500 High Density Residential/MU-2 Mixed Use Overlay to PF Public Facility.
5. Vacant, 6,000 square foot beachfront parcel at the north side of Daisy Avenue, adjacent to Dunes Park, from R-1500 High Density Residential/MU-2 Mixed Use Overlay to PF Public Facility.
6. 926 Ocean Lane, from R-1500 High Density Residential/MU-2 Mixed Use Overlay to PF Public Facility.

**SECTION 2.** This Ordinance shall be codified.

**SECTION 3.** The City Clerk of the City of Imperial Beach shall certify the adoption of this Ordinance and cause the same to be published in a manner required by law.

**SECTION 4.** This Ordinance shall take effect on the date of adoption by the California Coastal Commission, but no sooner than thirty (30) days after its passage by the City Council.

**SECTION 5.** Upon certification by the California Coastal Commission, the City Clerk shall, within thirty days, notify the County Assessor of the zoning reclassifications described herein.

**INTRODUCED AND FIRST READ** at a regular meeting of the City Council of the City of Imperial Beach, California, held the 20<sup>th</sup> day of May, 1998, and thereafter **PASSED AND ADOPTED** at a regular meeting of said City Council held the 3<sup>rd</sup> day of June, 1998, by the following roll call vote:

AYES:	COUNCILMEMBERS:	BIXLER, ROSE, WINTER, BENDA, HALL
NOES:	COUNCILMEMBERS:	NONE
ABSENT:	COUNCILMEMBERS:	NONE

Michael B. Bixler

MICHAEL B. BIXLER, MAYOR

ATTEST:

Linda A. Trovan

LINDA A. TROYAN, CITY CLERK

APPROVED AS TO FORM:

Lynn R. McDougal

LYNN R. MCDUGAL, CITY ATTORNEY

I, City Clerk of the City of Imperial Beach, do hereby certify the foregoing to be a true and exact copy of Ordinance No. 98-925 - An Ordinance of the City of Imperial Beach AMENDING THE CITY'S GENERAL PLAN/LOCAL COASTAL PLAN (LCPA/ZCA 98-01), TO REZONE CERTAIN PROPERTIES IN THE CITY OF IMPERIAL BEACH AS DESCRIBED IN EXHIBIT 'A', HERETO ATTACHED.

  
CITY CLERK

6-8-98  
DATE

**ORDINANCE NO. 98-925**

**EXHIBIT A**

**AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF IMPERIAL BEACH, CALIFORNIA, AMENDING THE CITY'S GENERAL PLAN/LOCAL COASTAL PLAN (LCPA/ZCA 98-01), TO REZONE CERTAIN PROPERTIES IN THE CITY OF IMPERIAL BEACH.**

- A. A vacant 1.25 acre parcel located on the east side of Seacoast Drive, between Encanto and Descanso Avenues, legally described as "That portion of Block A of Imperial Beach Extension No. 1, in the City of Imperial Beach, County of San Diego, State of California, according to Map No. 1214, filed in the Office of the County Recorder of San Diego County October 15, 1909, lying southerly of the location and prolongation of a line described as follows: Beginning at a point in the Easterly line of said Block A distant thereon 604 feet Northerly from the Southeasterly line of said Block A; thence Westerly parallel with the Southerly line of said Block A, a distance of 76.80 feet to the Westerly line of said Block (from R-1-6000 Single-family Residential to OS Open Space).
- B. 1059 Ninth Street and 915 Ebony Avenue, legally described as being a consolidation of Lots 4 and 5 and the northerly 15 feet of Lot 6, block 137 of South San Diego Park Extension, in the City of Imperial Beach, County of San Diego, State of California, according to Map thereof, No. 1590 filed in the Office of the County Recorder of San Diego County July 14, 1913 (from C-3 Neighborhood Commercial to R-300 Two-family Residential).
- C. 909, 911, and 915 Ebony Avenue, legally described as being a consolidation of Lots 1, 2 and 3 in Block 137, of South San Diego Park Extension, in the City of Imperial Beach, County of San Diego, State of California, according to Map thereof No. 1590 filed in the Office of the County Recorder of San Diego County July 14, 1913 (from C-3 Neighborhood Commercial to R-3000 Two-family Residential)
- D. Vacant parcel on Ocean Lane, legally described as Lots 6 and 7 in Block 3 of South San Diego Beach, in the City of Imperial Beach, County of San Diego, State of California, according to Map thereof No. 1071, filed in the Office of the County Recorder of San Diego County July 6, 1907 (from R-1500 High Density Residential to PF Public Facility).
- E. A vacant beachfront property adjacent to Dunes Park, legally described as Lots 1 and 2 in Block 8 of South San Diego Beach, in the City of Imperial Beach, County of San Diego, State of California, according to Map thereof No. 1071, filed in the Office of

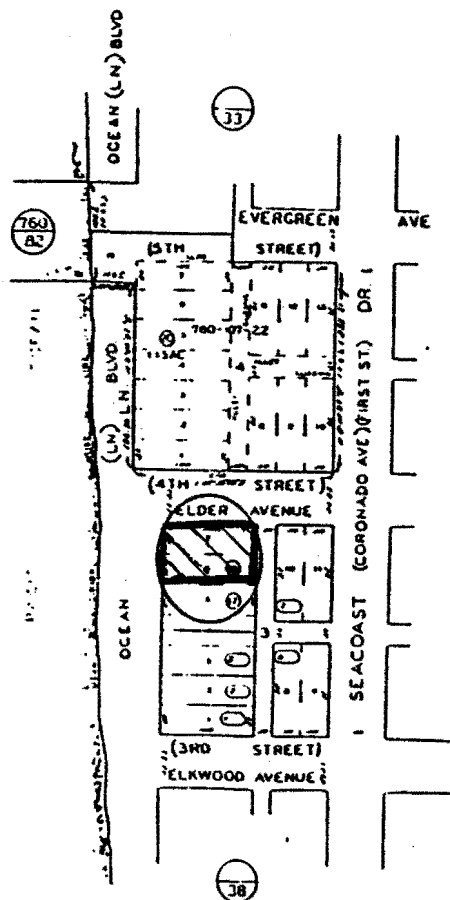
**EXHIBIT A**

the County Recorder of San Diego July 6, 1907 (from R-1500 High Density Residential to PF Public Facility).

- F. 926 Ocean Lane, legally described as Lot 2 of Block 5, according to Map No. 1071, South San Diego Beach, in the City of Imperial Beach, County of San Diego, State of California, filed in the Office of the San Diego County Recorder July 6, 1907 (from R-1500 to PF Public Facility).





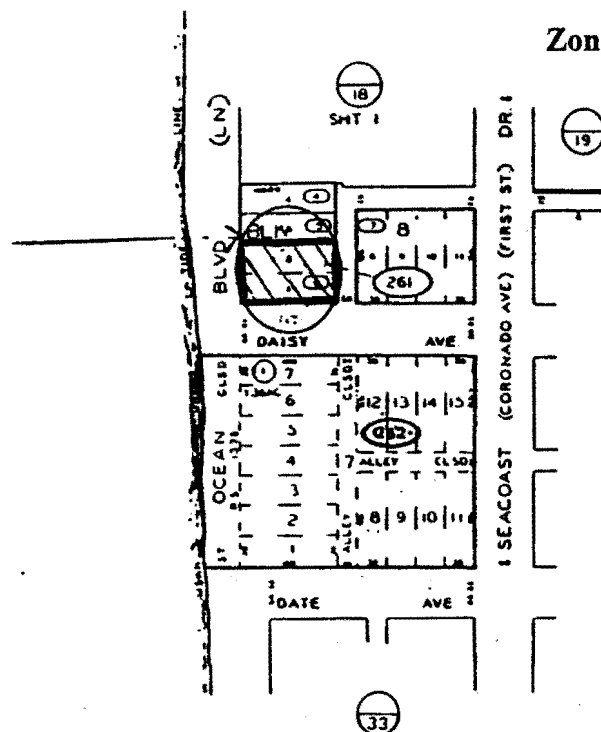


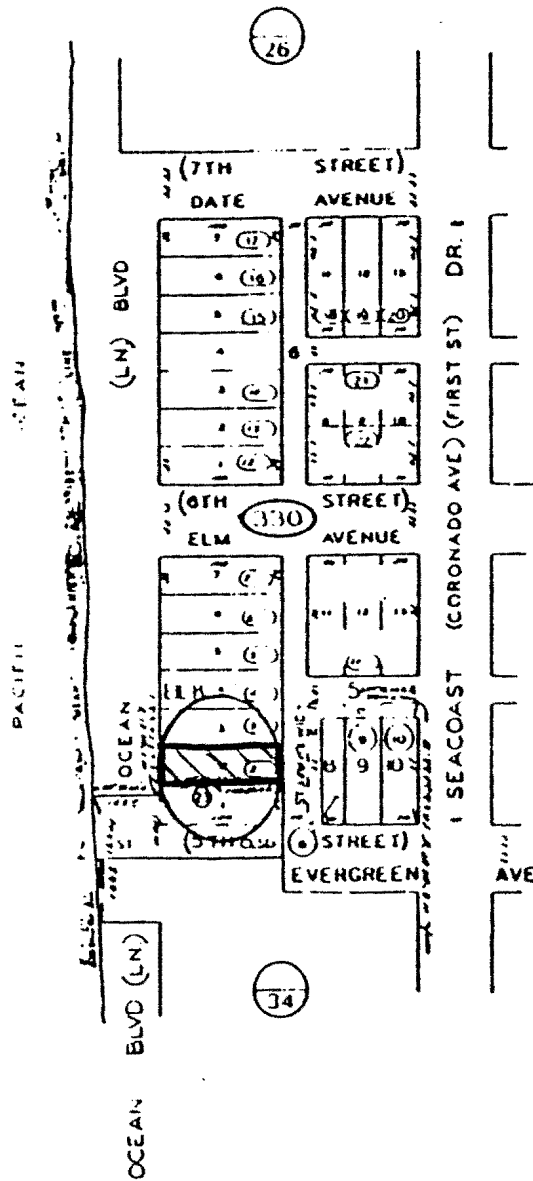
960 Ocean Lane (site of the future Public Safety Center)

Zoning: PF Public Facility

Vacant parcel adjacent to Dunes Park, southward to Daisy Avenue

Zoning: PF Public Facility





926 Ocean Lane

Zoning: PF Public Facility