

Title:	General Plan Conformance Review for Eureka City Schools Property Exchange
Project:	GPC-24-0001
Location:	3553 I Street and 674 Allard Avenue (former Jacobs Junior High campus)
APNs:	011-221-018 (3553 I Street) and 009-111-006, 009-101-018 (674 Allard Avenue)
Applicant:	Gary Storts, Superintendent, Eureka City Schools
Property Owner:	Charles Tripodi (3553 I Street) and Eureka City Schools (674 Allard Avenue)
Purpose/Use:	Eureka City Schools intends to acquire 0.15 acres of land at 3553 I Street and dispose of the lower 8.3 acres of the former Jacobs Junior High campus.
General Plan:	LDR – Low Density Residential (3553 I Street) and PQP – Public/Quasi-Public (674 Allard Avenue)
Zoning:	R1 – Residential Low (3553 I Street) and PF – Public Facilities (674 Allard Avenue)
Staff Contact:	Penelope Ponce, Assistant Planner
Recommendation:	Receive report; and Adopt a resolution finding Eureka City Schools' acquisition of 3553 1 Street and disposal of 674 Allard Avenue in conformance with the City's 2040 General Plan.
Motion:	"I move the Planning Commission adopt a resolution finding Eureka City Schools' acquisition of 3553 I Street and disposal of 674 Allard Avenue in conformance with the City's 2040 General Plan."

Figure 1: Location Map



PROJECT SUMMARY

Eureka City Schools, a California Public School District (the District), is proposing to acquire a residential lot with one-single-family residence and one accessory dwelling unit (ADU), located

at 3553 I Street (Figure 2)¹. The district proposes to continue to use the property for housing. The District also intends to dispose of the lower 8.3 acres of a larger 14.1-acre site located at 674 Allard Avenue (the former Jacobs Junior High campus) as surplus property (Figure 3). The District plans to use the funds from the disposal to help meet their capital facility needs.

Figure 2: Site Map of 3553 I Street



Figure 3: Site Map of 764 Allard Avenue



Background

Figure 4: Street View from I Street (facing east)



3553 I Street

The 0.15-acre site proposed for acquisition (acquisition site) at 3553 I Street has a land use designation of Low Density Residential (LDR), and is zoned Residential Low (R1). The land

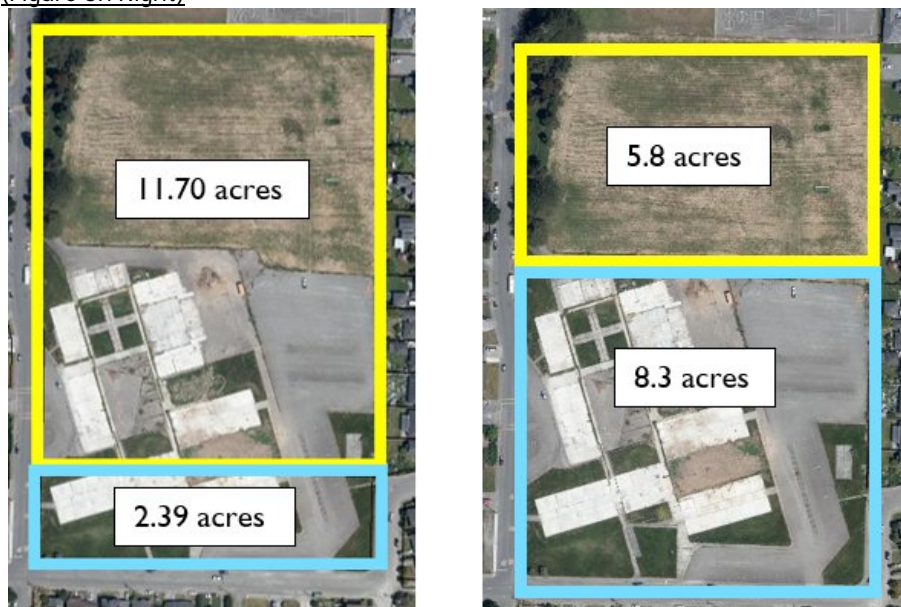
¹ AMG Communities – Jacobs, LLC is currently in contract with the existing property owner of 3553 I Street, and to the District’s knowledge, the title has not yet transferred to AMG Communities – Jacobs, LLC.

surrounding the parcel is zoned R1 and developed with single-family residences and accessory dwelling units. The 6,534-square-foot (-sf) site contains one single-family residence and one ADU; the units are approximately 950 sf and 480 sf. The acquisition site also contains an approximately 480-sf garage. The District intends to use the I Street property for workforce housing for District employees. Specific plans have not yet been developed by the District. The current intent is to use the existing structures, though that might be revisited in the future. The units would be leased, and no decisions have been made yet about rates.

Figure 5: Jacobs Site - 674 Allard Avenue (facing south)



Figure 6: Jacobs Site Current Parcel Boundaries (Figure on Left) Compared to Land Portion Being Sold and Retained (Figure on Right)



647 Allard Avenue (Jacobs Site)

As discussed above, the Jacobs site at 674 Allard Avenue is approximately 14.1 acres in size, and the District proposes to dispose of the southernmost 8.3 acres of the site and retain the recreation fields on the northern 5.8 acres (Figure 3, above). The current site contains two parcels: the northern parcel (APN 009-101-018) is 11.70 acres, and the parcel to the south (APN 009-111-006) is 2.39 acres. Prior to disposal, a Lot Line Adjustment (LLA) will be required to move the shared lot line north so that the entire 8.3 acres to be sold and the land being retained by the District are located on separate legal parcels (Figure 6, above).

The Jacobs site has a land use designation of Public/Quasi-Public (PQP) and is zoned Public Facilities (PF). Alice Birney Elementary School is located directly to the north and is also zoned PF. The land further north is zoned Residential Low (R1) and Residential Medium (R2), and the land east and west of the site is zoned R1. The land directly south of the site is located outside of the Eureka City limit line, and is zoned by the County of Humboldt as Residential One-Family (R-1).

Jacobs Junior High was built in 1956 and served as a junior high school up until 1982. After its closure as a junior high, the facility continued to be used for various functions such as adult education and a continuation high school until the facility was closed following the 2008-09 school year.² Other than the recreation fields, the property was largely unused and the buildings unmaintained for greater than a decade before demolition of the structures occurred in January 2021.

On June 6, 2019, the District's Board of Education (the Board) adopted a Resolution declaring the Jacobs site as surplus to the District's needs. Entities such as the City of Eureka as well as California Highway Patrol (CHP) made offers to purchase the surplus site from the District, but, after years of negotiation with these various entities, the Board adopted a Resolution on December 14, 2023 to enter into an Exchange Agreement with AMG Communities – Jacobs, LLC (the Developer) to exchange the lower 8.3 acres (valued at \$6 million) of the Jacobs site for the property at 3553 I Street (valued at \$650,000). The District and the Developer agreed to a condition of closing the exchange that the Developer pay the difference in Fair Market Value between the District Exchange Property (Jacobs site) and the Developer Property (3553 I Street) for \$5,350,000 (see Attachment 5).

At this time, the Developer has not informed City Staff about their plans for development of the Jacobs site, although the Developer has published a website (<https://thejacobscommunity.com/>) stating they have "no firm plans," but that the Jacobs site "is large enough to support a mix of housing and some neighborhood-serving commercial uses," and "will likely be redeveloped into a mix of rental and owner-occupied housing." Pursuant to California Government Code §65402, the Planning Commission is tasked with reviewing the District's purpose for disposing of the Jacobs site, not the Developer's purpose for purchasing the site. According to the District, the reasons for disposition are that the lower 8.3 acres of the Jacobs site are no longer needed for agency use and funds from the disposal will be used to help meet the District's capital facility needs.

²Information on the history of the site is from Eureka City Schools' website https://www.eurekacityschools.org/archived_news/the_jacobs_junior_high_school_campus_then_and_now

Any proposed private residential or commercial development at the Jacobs site would require Zoning and General Plan Map amendments to change the zoning/land use designations of the site, as the current PF/PQP designations only allows for government facilities, schools, and similar land uses as described in Eureka Municipal Code (EMC) §155.216.020 (Allowed Land Uses). Pursuant to EMC §155.432.020, Zoning and General Plan Map amendments can be initiated by the City Council, Planning Commission, Director of Development Services, or one or more owners of the property for which the amendment is sought. A ballot initiative can also require Zoning and General Plan Map amendments if approved by the voters, and there is a ballot initiative that qualified for the City's next general election, that, if passed, would require the City to rezone the Jacobs site.³

APPLICABLE REGULATIONS

Since the proposed project is located within the City limits of Eureka, California Government Code §65402 requires the District, prior to either acquisition or disposal of real property, to request a determination from the City of Eureka's Planning Commission as to the conformity of the location, purpose and extent of the acquisition/disposition with the City's adopted General Plan (known as the 2040 General Plan). Pursuant to California Government Code §65402, after the District submits the request, the Planning Commission has 40 days to report on General Plan conformance; failure to provide a report within the 40-day timeframe is conclusively deemed a finding that the proposed acquisition and disposal are in conformity with the City's adopted General Plan. The application for General Plan conformance was submitted to the City on February 12, 2024, and the 40-day response period terminates on March 22, 2024.

GENERAL PLAN CONSISTENCY ANALYSIS

3553 I Street Acquisition Consistency Analysis

2040 General Plan Land Use Designation

The land use designation for the I Street property is Low Density Residential (LDR). The LDR land use designation is defined as follows in the City's 2040 General Plan:

Single-family detached and attached homes, accessory dwelling units and compatible public/quasi-public uses. Intended to be suburban in character and located in proximity to parks, schools, and public services. Limited neighborhood serving market-commercial uses may be allowed where they enhance the quality of life of the neighborhood and as provided by the applied zoning district.

The I Street site is currently developed with a single-family residence and accessory dwelling unit, and the stated intent of the District is to continue to use the site for housing, consistent with the intent of the LDR designation.

³The Initiative, if passed, would amend the City's General Plan to create a "Housing for All Overlay Designation" that would apply to the entire 14.1-acre Jacobs site and would authorize a variety of residential, commercial, and public facility uses by right at the site, and would require at least 40% of the total ground area of the site be dedicated to high-density residential uses, exclusive of any areas dedicated to public facility uses.

2040 General Plan Goals and Policies⁴

Goals and policies in the City's 2040 General Plan were reviewed for applicability to the District's proposed acquisition of the I Street property, and the following goals and policies were identified for Planning Commission's consideration:

LU-1.9 Existing Buildings and Sites. Support economic investment in and incentives for improvements to existing buildings and sites including facade improvements, new paint and signage, retrofitting, adaptive reuse, and upgraded landscaping and paving.

Consistent. The I Street site is already developed and the District intends to continue to maintain the existing buildings, in order to provide housing for District employees. Although no improvements to the site and its existing buildings are proposed at this time, the investment in the property is consistent with Policy LU-1.9.

LU-5.5 Existing Neighborhoods. Protect and enhance the integrity of Eureka's existing neighborhoods by: ...

b. Supporting efforts to improve and maintain neighborhood appearance and the existing housing stock;

Consistent. The District is proposing to use housing stock in one of the City's existing neighborhoods to provide homes for District employees. The District will protect Eureka's existing neighborhoods and housing stock if they continue to maintain the property's appearance and use the property for residential purposes or other allowed uses in the R1 zone district.

674 Allard Avenue (Jacobs Site) Disposition Consistency Analysis

2040 General Plan Land Use Designation

The designation for the Jacobs site is Public Quasi Public (PQP). The PQP land use designation is defined as follows in the City's 2040 General Plan:

Public and private institutional uses, government facilities and services, schools, courts, cemeteries, fairgrounds, airports, marinas and wharves, and major utility facilities, as well as parks, golf courses and other public recreational facilities. Intended to be applied to uses and facilities that are of a size and intensity that warrant an individual land use designation and/or to accommodate both active/programmable and passive/self-directed recreational facilities. Retail, service uses, and other uses determined to have a public benefit and that are incidental to the primary use may be allowed as provided by the applied zoning district.

⁴ The full list of goals and policies can be found in the City's 2040 General Plan which is available on the City of Eureka's website, under the Planning Library page. Enter "Eureka Planning Library" into your search browser; or use this link: eureka.gov/DocumentCenter/View/1190/2040-General-Plan-PDF?bidId=

The Jacobs site was used as a school consistent with the PQP designation; however, due to a significant decline in District enrollment from a peak of more than 8,000 students to the current enrollment of around 4,000, the campus is no longer necessary for use as a school and the school buildings have been demolished. Any future use of the Jacobs site by the purchaser must be consistent with the PQP designation and associated PF zoning, unless a General Plan and Zoning map amendment are first processed to change the land use and zoning designations for the property.

2040 General Plan Goals and Policies

The goals and policies of the City's 2040 General Plan were reviewed for applicability to the proposed disposition of the Jacobs site, and the following goals and policies were identified for Planning Commission's consideration:

- LU-5.5 Existing Neighborhoods. Protect and enhance the integrity of Eureka's existing neighborhoods by: ...
- b. Supporting efforts to improve and maintain neighborhood appearance and the existing housing stock;

Consistent. The lower 8.3 acres of the Jacobs site currently do not contribute to the surrounding neighborhood's appearance as the land is covered in unmaintained pavement and remnant building foundations. Disposing of the site to the Developer will provide an opportunity to redevelop the vacant site in a manner which will improve the neighborhood's appearance consistent with Policy LU-5.5.

- LU-6.2 Infill First. Promote development of vacant infill properties and redevelopment/reuse of economically underutilized sites and buildings to accommodate new growth and internal densification prior to considering potential annexation.

Consistent. The Jacobs site is underutilized and is located in the center of one of the City's most densely populated neighborhoods and is surrounded by three major collector streets.⁵ The District has not used the lower 8.3 acres of the site for over a decade, and its disposition to a private developer is anticipated to facilitate development in an infill location that can accommodate new growth and internal densification consistent with Policy LU-6.2.

- CS-3.1 Quality Education. Continue to support local school districts, charter schools, private schools, and higher education institutions in providing quality education and equitably distributed facilities.
- CS-3.6 Funding Sources. Cooperate with school districts in identifying and pursuing funding sources to rehabilitate, improve, and expand existing schools.

⁵ Information about the City of Eureka's population is from the Census Reporter website <https://censusreporter.org/profiles/14000US06023000300-census-tract-3-humboldt-ca/>

CS-3.7 School Site Reuse. Encourage reuse of former schools, and consider reopening schools when warranted by student generation.

Consistent. Although Jacobs Junior High School was well suited to support the equitable distribution of middle schools within the City, the District has already demolished the buildings and no longer has a need for the campus as the District can support its student population with Zane and Winship middle schools. The District will use funds from the disposal to support its existing facilities and to provide quality educational opportunities for students. Disposing of the land will also provide opportunity for new development on a site that has been unoccupied for 15 years.

AC-1.7 Youth Engagement. Continue to encourage the development of entertainment, recreational, and cultural activities for youth.

PR-1.9 Youth Engagement. Continue to provide positive educational and social influences for youth, including at risk youth, and collaborate with other organizations in Eureka to expand the range of positive opportunities.

Consistent. The District plans to retain approximately 5.8 acres on the northern portion of the Jacobs site (a portion of APN 009-101-018) and continue using the space as recreation fields which will provide students with recreational and social opportunities. The continued use of the 5.8 acres as recreation fields is consistent with Policies AC-1.7 and PR-1.9.

PR-1.4 Funding. Adopt funding mechanisms for the development and ongoing maintenance and operation of parks and recreational facilities and services.

Consistent. Disposing of the approximately 8.3 acres on the southern portion of the Jacobs site will provide the District with funding sources which can be used to support the continued maintenance and operation of the recreation fields as well as other district facilities.

PR-1.5 Joint Use. Coordinate with local school districts to encourage combined school and park facilities where feasible. Enter into joint use agreements to maximize the provision of community services, minimize the duplication of services, and facilitate shared financial and operational responsibilities.

Consistent. Although the fields are owned and used by the District, they have been funded by the Rotary Club of Southwest Eureka and used for the Humboldt Youth Soccer League and other youth recreation programs. The District's ownership of the recreation fields will allow students as well as other members of the community to continue their recreational activities.

Consistency Determination

The review identified applicable goals and policies of the 2040 General Plan and found acquisition and disposal of the subject properties are consistent with, and supported by, the applicable goals and policies.

ENVIRONMENTAL

The City of Eureka

The City's General Plan Conformance Review of the District's acquisition and disposal of land does not trigger CEQA as the review is advisory and non-binding and the City has no discretion in how the project is conducted. The request is only for review of the project's conformance with Eureka's 2040 General Plan, and regardless of whether the Planning Commission determines the proposed acquisition and disposal is or is not in conformance with the General Plan, the District can still proceed with the exchange of property as proposed. The City has no discretion to change the project or impose mitigation in response to environmental concerns.

The District

The District's acquisition and disposal of land does constitute a discretionary action by a public agency and is subject to CEQA. The District, as Lead Agency, has determined the proposed project is categorically exempt from the provisions of CEQA pursuant to CEQA Guidelines §15061(b)(3) (Common Sense), §15301 (Existing Facilities), and §15312 (Surplus Government Property Sales). The District filed a CEQA Notice of Exemption at Humboldt County Recorder's Office on December 28, 2023 (Attachment 6).

STAFF CONTACT

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DOCUMENTS ATTACHED

Attachment 1: Planning Commission Resolution 2024 - X.....pages 10 - 12
Attachment 2: Eureka City Schools Planning Application.....page 13
Attachment 3: Eureka City Schools General Plan Conformance Request Letter.....pages 14 - 15
Attachment 4: Eureka City Schools Resolution No. 23-24-023.....pages 16 - 18
Attachment 5: Eureka City Schools Exchange Agreement.....Pages 19 - 41
Attachment 6: Eureka City Schools Notice of Exemption.....pages 42 - 70