

Title:	General Plan Conformance Review for Humboldt County Office of Education’s Acquisition of 1105 Myrtle Avenue
Project:	General Plan Conformance GPC-25-2
Location:	1105 Myrtle Avenue
APN:	006-093-022
Applicant:	Miles Davies-Hughes, County Superintendent of Schools
Property Owner:	Longs Drugs Store Inc
Purpose/Use:	Relocate Humboldt County Office of Education administrative programs from Downtown to repurposed offices within the former CVS drug store on Myrtle Avenue to consolidate and expand services.
Application Date:	August 18, 2025
Deadline for Action:	September 27, 2025 (40 days after complete application)
General Plan:	GC – General Commercial (Local Coastal Program) NC – Neighborhood Commercial (2040 General Plan)
Zoning:	CN – Neighborhood Commercial
Staff Contact:	Henry Baker, Assistant Planner
Recommendation:	Receive report; and Adopt a resolution finding Humboldt County Office of Education’s acquisition of 1105 Myrtle Avenue substantially conforms with the City’s 2040 General Plan.
Suggested Motion:	“I move the Planning Commission adopt a resolution finding Humboldt County Office of Education’s acquisition of 1105 Myrtle Avenue substantially conforms with the City’s 2040 General Plan.”

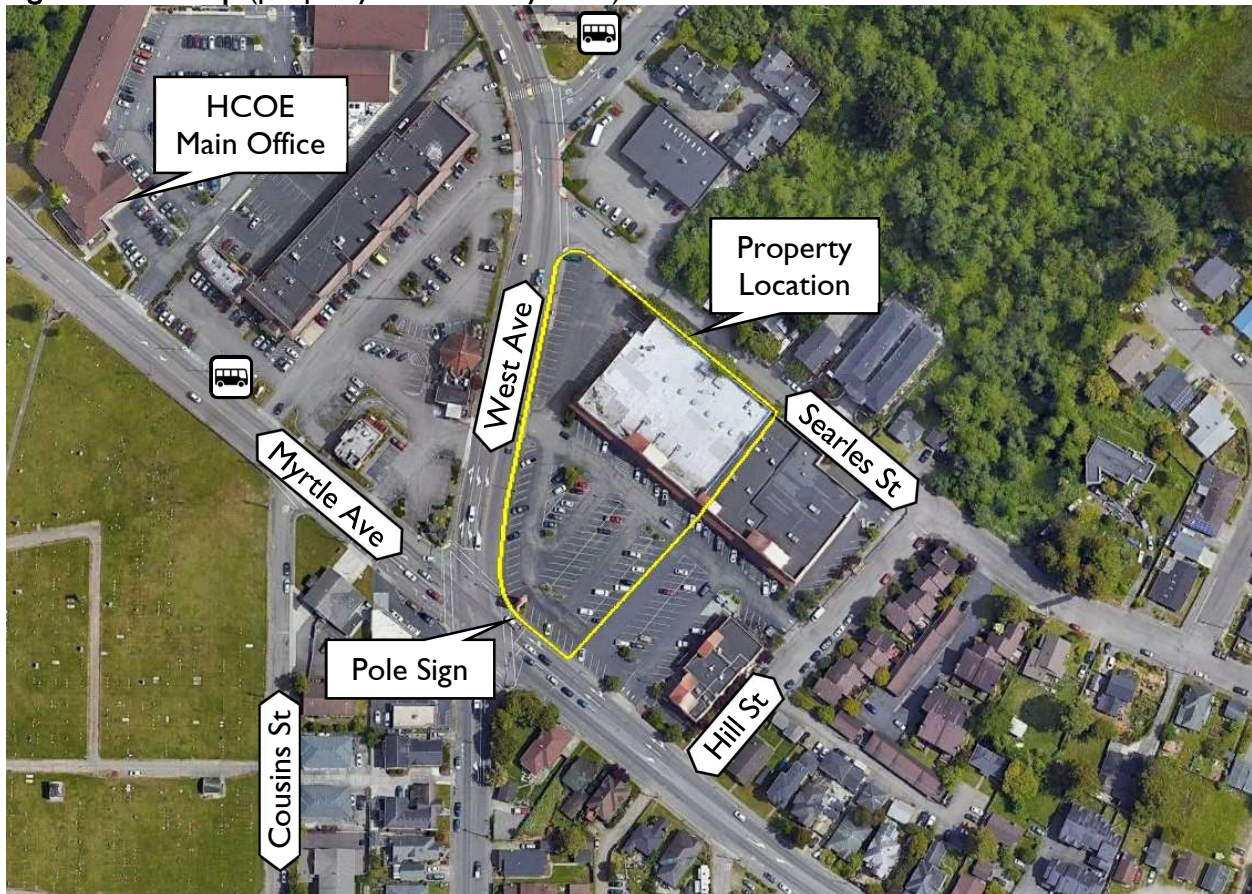
Figure 1: Project Location



PROJECT DESCRIPTION

Humboldt County Office of Education (HCOE) is requesting a General Plan Conformance Review for the proposed acquisition of 1105 Myrtle Avenue (subject property). The 2.04-acre (83,102 square-foot [sf]) property is located at the northeast corner of Myrtle and West Avenues and contains a 25,411-sf single-story building, a 109-space¹ parking lot, and a freestanding 35-foot(ft)-tall pole sign (see Figure 2 below).

Figure 2: Site Map (property outlined in yellow)



Background on the Acquisition

HCOE is the local educational agency for Humboldt County's 30 school districts and 15 charter schools, serving the needs of over 17,000 students. Its functions include fiscal oversight, administrative support, special education, credentialing, professional development for educators, and many services that support educational programs throughout the County.

HCOE's administrative offices are currently spread across three locations within the City of Eureka. HCOE owns 901 Myrtle Avenue, which houses HCOE's main offices and conference

¹ Not including an additional 18 parking spaces located partially on the subject property that cross the property line.

center, and rents space at two satellite locations: 622 H Street and 540 E Street². The 622 H Street office houses HCOE's Health Team, Prevention and Intervention Services, and Special Education Department. The office at 540 E Street houses the Early Childhood Education programs. Combined, the two satellite offices employ 80-100 staff, approximately 1/4 to 1/3 of whom are itinerant workers deployed throughout the County.

The acquisition will enable HCOE to relocate programs from its satellite offices to the subject property, provide new spaces for meetings and professional development, and allow HCOE to build equity through property ownership, rather than leasing privately owned spaces. The acquisition may also allow HCOE to relocate some programs from its main office at 901 Myrtle Avenue to the subject property, opening space for student activities at the main office. The subject property cannot meet Division of the State Architect (DSA) standards for student use, but the main office (formerly Franklin Elementary School) can be recertified, creating an opportunity to reopen portions of the main office site for student activities.

Per the applicant, HCOE has been seeking a new location for its programs for several years, citing the need for employee parking, available space, and access to public transportation facilities as key reasons for selecting the subject property. The subject property is located only one block southeast of the main office. Consolidating these offices in close proximity will improve the coordination and efficiency of HCOE programs through reduced travel time and improved communication between locations.

The subject property (1105 Myrtle Avenue) comprises part of the Myrtle and West shopping center with 1111 Myrtle Avenue to the east. The shopping center was constructed circa 1971, before the passage of the 1976 Coastal Act. In 1999, the shopping center was subdivided to create the two properties. Various businesses have occupied the commercial tenant spaces at 1111 Myrtle Avenue; however, 1105 Myrtle (the subject property) has remained a drug store since its construction.

Converting the drug store into office space will require interior renovations, replacement of the roof, and improvements to the façade. No building additions, alterations to the pole-sign, or alterations to the parking lot are planned at this time. If HCOE constructs a new public building or structure on the subject property in the future, a Coastal Development Permit (CDP) may be required, and the Planning Commission will make a new determination regarding the development's conformance with the General Plan (see Applicable Regulations, below).

The acquisition raises additional considerations related to the pole sign and parking lot. The pole sign on the subject property provides advertising space to the other tenants within the Myrtle and West shopping center as an existing non-conforming off-premises sign. However, the sign was established before October 13, 2022, and may continue³. Per the nonconforming sign provisions of the City's Local Coastal Program (§10-5.2201 et seq.), legally nonconforming signs may be routinely maintained and repaired, including repainting and changes to sign copy/face, but may not be moved, altered, or enlarged.

² HCOE also leases space at the adjacent properties at 520 and 530 E Street.

³ Per Local Coastal Program §10-5.1704.1(d), new off-premise signs established on or after October 13, 2022 are prohibited.

Because there are no planned barriers or delineations between parking areas on either property, the acquisition continues a shared parking situation between HCOE and the tenants of 1111 Myrtle Avenue. As mentioned above, 18 parking spaces cross the property boundary. Recorded restrictions and grants of easement established May 31, 2000, may address ambiguity regarding rights to the pole sign and parking lot; however, Planning has not verified these documents at the time of this report.

The subject property is located in the Coastal Zone within the City's CDP jurisdiction. While local agencies such as HCOE generally operate under State authority and are not subject to local land-use approvals, the Coastal Zone presents a different context. A CDP is a State-level permit required by the Coastal Act; when issued by the City under its certified Local Coastal Program, the City serves as the State's delegated permitting authority. Accordingly, even under HCOE ownership, any future development at the site must be consistent with the City's certified Local Coastal Program and may require a CDP from the City.⁴

APPLICABLE REGULATIONS

California Government Code §65402 requires a local agency, prior to either acquisition or disposal of real property, and/or construction of public buildings or structures within the City limits of Eureka, to request a determination from the City of Eureka's Planning Commission as to the conformity of the proposed project with the City's adopted 2040 General Plan. §65402 requires the Planning Commission to provide the determination within 40 days of the request submittal. Failure to provide the determination within the 40-day timeframe is conclusively deemed a finding that the acquisition is in conformity with the City's adopted General Plan. The application for General Plan conformance review was submitted to the City on August 18, 2025, and the 40-day response period ends on September 27, 2025.

GENERAL PLAN CONSISTENCY

In the Coastal Zone, the City's land use plans and designations are part of the City's Local Coastal Program and therefore must be certified by the California Coastal Commission as being consistent with, and adequate to carry out, the California Coastal Act. The land use designations of the City's 1997 General Plan were effectively certified by the Coastal Commission in 1999. The City recently adopted a comprehensive update to its 1997 General Plan in 2018, called the 2040 General Plan. Although the 2040 General Plan applies Citywide and includes land use designations for the Coastal Zone, those designations will not be effective in the Coastal Zone until certified by the California Coastal Commission. The subject property has different land use designations under the City's certified Local Coastal Program (the 1997 General Plan) and adopted 2040 General Plan. As a result, analyses of both the current Local Coastal Program land use designation and the 2040 General Plan land use designation for the property have been included below.

⁴ The site is in an area of the City's Coastal Zone where the construction, reconstruction, demolition, or alteration of a principally permitted use is exempt from the requirement for a Coastal Development Permit, provided the proposed development is consistent with all of the policies and standards the certified Local Coastal Program. Administrative offices are a principally permitted use that may be exempt from the need for a Coastal Development Permit. However, any development occurring on the site must be consistent with the Local Coastal Program, regardless of whether it qualifies for a Coastal Development Permit exemption.

Certified Local Coastal Program Designation

The Neighborhood Commercial (NC) designation in the Local Coastal Program is as follows:

The NC designation provides for retail stores, offices, and personal service businesses that are intended primarily for residents of the immediate area, including neighborhood shopping centers of limited size and in locations that minimize adverse impact on adjoining residential uses. The maximum FAR for buildings in areas designated NC is 0.50, with upper floor residential units permitted in multi-story buildings. The assumed number of persons per dwelling unit is 1.5.

2040 General Plan Land Use Designation

The General Commercial (GC) designation in the adopted 2040 General Plan is as follows:

Broad variety and scale of retail, office, restaurants, lodging, entertainment, outdoor sales, large product retail sales, storage, warehousing, wholesale, and residential uses. Intended to be an intensive auto- and pedestrian-oriented commercial district primarily located in or adjacent to highly visible areas, and provide for local, regional and visitor needs. Residential and office uses are primarily allowed only on upper floors and non-street-facing portions of buildings, and only as provided by the applied zoning district. Intensity: Maximum 2.5 FAR.

Both land use designations allow a mix of uses that include offices, but each emphasizes retail over other uses. The NC designation is the more restrictive, emphasizing the limited size of shopping centers, in order to minimize impact on nearby residential neighborhoods. While the NC designation is primarily focused on serving locals in the surrounding neighborhood, the GC designation allows a broader range of uses and densities that support not only locals but also regional and visitor needs. The property's current FAR is 0.31, far below the threshold for both designations, and is not expected to change as a result of the acquisition or HCOE's planned improvements. For these reasons, the acquisition may be found consistent with both land use designations; however, the acquisition is more consistent with the GC land use designation because of HCOE's regional role.

Goals and Policies

Staff has reviewed the 2040 General Plan (General Plan) and found the following relevant goals and policies:

Goal LU-1. A community that values its unique small-town charm and livability while thoughtfully advancing new prospects for growth and economic vitality.

Partially Consistent.

Unique small-town charm and livability: The subject property, in its current form, does not reflect the City's small-town charm or livability objectives. It was developed as a conventional shopping center with a generic building design, large surface parking lots fronting the intersection, and a building set back from the street rather than framing it. The scale and layout are auto-oriented rather than human-scaled. While HCOE proposes to occupy the existing building shell at this time, their institutional use may create future opportunities to redevelop the property in a

manner that better reflects Eureka's small-town character—bringing buildings closer to the street, enhancing walkability, and improving the overall public realm. Because the subject property is located within the Coastal Zone, any future redevelopment must be consistent with the City's certified Local Coastal Program and may require a Coastal Development Permit, providing the City with the ability to influence design and site planning to ensure alignment with community goals for small-town charm and livability.

Growth and economic vitality: The acquisition promotes growth and economic vitality by re-occupying a recently-vacant, large-format retail building, preventing the blight often associated with vacant and underutilized properties, and ensuring that a major employer (HCOE) remains located in Eureka. The presence of HCOE's substantial workforce on site will also generate demand for local goods and services, providing additional support for surrounding businesses. Conversely, the subject property's location at a prominent, high-traffic intersection offers strong potential for continued retail use that could generate significant sales tax revenue for the City, an opportunity that will not be realized under institutional ownership.

As such, the acquisition may be found partially consistent with Goal LU-1.

Policy LU-1.3 Beneficial Development. Support development that affords benefits to all segments of the community that:

(g) Encourages people to walk, bike, or use transit.

Consistent. The subject property is next to a Class II bike lane on Myrtle Avenue and a proposed Class III bike lane on West Avenue. Two transit stops are within one block of the subject property, one on Myrtle Avenue to the west and one on Tydd Street to the north. The subject property is also near the terminus of the Eureka Waterfront Trail to the north, which in-turn connects to a continuous network of trails, including the recently completed Humboldt Bay Trail and future Eureka Bay to Zoo Trail. Together, these facilities provide HCOE staff and visitors with opportunities to use active and public transportation. Because the subject property is close to the main office, the acquisition encourages workers at both locations to walk or bike between facilities. For these reasons, the acquisition is consistent with Policy LU-1.3.

(h) Integrates development with public rights-of-way, parks, open spaces, plaza's, boardwalks, trails and other public spaces.

Consistent. The subject property is near several recreation areas, including Eureka Skate Park and Cooper Gulch Recreation Center which can be accessed from 8th Street to the west of the subject property. As noted above, a continuous trail system may be accessed from Tydd Street to the north of the subject property.

(k) Develops intersection corners and street frontages with buildings instead of parking lots.

Partially Consistent. The property's parking lot occupies the corners where West Avenue intersects Searles Street and Myrtle Avenue. While this does not meet the policy objective to replace corner parking lots with building frontages, HCOE may choose to further develop the subject property in the future. Since the condition exists and these corner sites remain available for infill development by HCOE (or

others through subdivision), the project is considered partially consistent with respect to this policy.

(l) Advances other City goals.

Consistent. HCOE provides a number of educational services supporting the well-being and health of the community. These functions advance broader General Plan goals related to public well-being and civic life, such as Goals LU-6, LU-3, E-3, and CS-3 described below.

Goal LU-3. Active, attractive, and prosperous corridors and centers that boost Eureka’s role as the regional hub of retail, professional/business services, and tourism.

Consistent. The acquisition supports Myrtle Avenue continuing and growing as an active and prosperous corridor by repurposing a recently-vacant commercial property within the Myrtle and West Shopping Center as administrative offices for a regional governmental agency, bringing additional economic activity to the area.

Policy LU-3.7 Small Neighborhood Commercial Centers. Support the growth and revitalization of the small neighborhood commercial centers on Wabash Avenue, Harris Street, and Myrtle Avenue.

Consistent. The acquisition will support economic activity because HCOE’s staff and visitors will frequent the commercial businesses and services in the area, which will further incentivize the addition of new businesses and services within the Myrtle Avenue commercial corridor. While the new offices will occupy space that would otherwise be used for large-format retail stores, multiple smaller, neighborhood-scale storefronts within the shopping center and the surrounding area remain available for retail use. Additionally, other large-format commercial spaces remain vacant in other commercial corridors within the City. The planned façade improvements will enhance the visual character of the Myrtle and West shopping center by beautifying and revitalizing the building’s façade. Since the shopping center became underutilized with multiple vacancies, unsanctioned activities that contribute to blight, such as camping, loitering, and illegal dumping, have been observed at the subject property. Revitalization of the property will provide passive surveillance to prevent these activities. For these reasons, the acquisition may be found consistent with this policy.

GOAL LU-6. New growth and annexation areas that are carefully planned, efficient, and contribute positively to the community.

Not Applicable. The subject property is within existing City limits, and so this goal, which is focuses on new growth and annexation areas, is not applicable. However, two policies within this goal are relevant to the acquisition: LU-6.2 Infill First and, to a lesser degree, LU-6.10 City Control.

Policy 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. As discussed in Policy LU-3.7 above, the acquisition allows HCOE to redevelop an underutilized commercial space with a new use that supports economic activity within the City consistent with this policy.

Policy LU-6.10 City Control. Maintain local control over land use and development decisions to the maximum extent possible.

Consistent. HCOE is not be subject to many of the City’s regulations. However, as discussed above, the subject property remains within the City’s CDP jurisdiction and therefore future development by HCOE must be consistent with the certified Local Coastal Program. Therefore, the City retains significant control over the future use or redevelopment of the subject property, making the acquisition partially consistent with this policy.

GOAL E-3. Abundant opportunities to facilitate the establishment and expansion of key job and revenue generating uses within the City.

Partially Consistent. The acquisition supports the administration of schools within the County and contributes to the vitality of the City’s office-based economy. While the offices will not directly generate revenue through property, income, or sales taxes, like large retail stores, they help support nearby businesses, provide hundreds of jobs, and reinforce Eureka’s regional role.

Policy E-3.8 Expanded Office-Based Business Sector. Maintain and expand the City’s role as the region’s primary center of professional and business services such as attorney’s, realtors, architects, engineers, investment specialists, and other office-based businesses and institutions.

Consistent. The acquisition expands professional office uses in the Myrtle Avenue commercial corridor, which supports the City’s economic development goals and maintains Eureka’s role as the region’s center for civic institutions, consistent with Policy E-3.8.

GOAL CS-3. Excellent educational opportunities and facilities throughout Eureka.

Consistent. The acquisition enhances the overall efficiency, coordination, and capabilities of HCOE programs, which broadly support educational opportunities throughout Humboldt County. The acquisition also creates the opportunity to reuse portions of the former Franklin School, located at 901 Myrtle Avenue, for student activities. Therefore, the acquisition may be found consistent with Goal CS-3.

Policy 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.

Consistent. The acquisition consolidates HCOE programs, which facilitates the efficient implementation of educational programs.

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

Consistent. HCOE’s main office, located at 901 Myrtle Avenue, is the former site of the Franklin School. As noted above, the acquisition creates the future opportunity for HCOE to create space for additional student activities within the main office because it can become DSA certified. Because the acquisition creates the opportunity to reuse the Franklin School site for student activities, the acquisition may be found consistent with the General Plan.

Mobility Policies

Consistent. The acquisition supports various General Plan policies related to mobility through the consolidation of public services within a transit-friendly commercial corridor.

Policy M-1.6 Dense Development. Integrate transportation and land use decisions to enhance opportunities for development that is compact, walkable and transit friendly.

Consistent. As discussed under policy E-3.8 above, the acquisition consolidates public-sector services within a transit friendly commercial corridor, incentivizing further development and economic activity within the area consistent with this policy.

Policy M-2.9 Multi-modal Access. Promote the provision of multi-modal access to activity centers such as commercial and employment uses, Downtown, Old Town, schools, and parks.

Consistent. Through the consolidation of HCOE programs within the Myrtle Avenue commercial corridor, the acquisition will serve to enhance employment and economic activity at a hub of multi-modal access, as noted in Policy LU-1.3 (g) and (h) above. Therefore, the acquisition may be found consistent with this policy.

Policy M-5.4 Parking Lot Location. Discourage placement of parking lots along major commercial, high pedestrian-use street frontages, and corners in the interest of maintaining continuous building frontages along the primary commercial streets and improving walkability in the Core Area.

Partially Consistent. See analysis under Policy LU-1.3(k) above.

CONCLUSION

Staff has reviewed the 2040 General Plan and identified a subset of relevant Goals and Policies as they relate to the acquisition. The acquisition is either consistent or partially consistent with all the relevant goals and policies. Based on the analysis above, the finding can be made the acquisition is substantially consistent with the General Plan. Therefore, staff recommends that the Planning Commission find the General Plan Conformance Review to be **substantially consistent** with the City's adopted General Plan.

ENVIRONMENTAL ASSESSMENT

The City of Eureka

The City's General Plan Conformance Review of the County's acquisition of real property does not trigger the California Environmental Quality Act (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 acquisition's conformance with Eureka's 2040 General Plan, and regardless of the Planning Commission's determination, the County can still proceed with the project as proposed. The City has no discretion to change the project or impose mitigation in response to environmental concerns.

HCOE

HCOE's acquisition constitutes a discretionary action by a public agency and is subject to CEQA. HCOE, as Lead Agency, has not yet made a CEQA determination. Any future redevelopment of the property would also be subject to additional CEQA review.

DOCUMENTS ATTACHED

Attachment 1: Resolution

Attachment 2: HCOE GPC Request