

PLANNING COMMISSION STAFF REPORT

August 13, 2025

Title:	General Plan Conformance Review for County Acquisition of 515 J Street
Project:	General Plan Conformance GPC-25-1
Location:	515 J Street
APN:	001-193-007
Applicant:	Kirstie Greene, Senior Real Property Agent, County of Humboldt
Property Owner:	Jon Stone and Larry O Doss
Purpose/Use:	Municipal office facility / TBD
Application Date:	July 28, 2025
Deadline for Action:	September 6, 2025 (40 days after complete application)
General Plan:	DC – Downtown Commercial
Zoning:	DT – Downtown
Staff Contact:	Henry Baker, Assistant Planner
Recommendation:	Receive report; and Adopt a resolution finding Humboldt County’s acquisition of 515 J Street substantially conforms with the City’s 2040 General Plan
Suggested Motion:	“I move the Planning Commission adopt a resolution finding Humboldt County’s acquisition of 515 J Street substantially conforms with the City’s 2040 General Plan.”

Figure 1: Project Location



PROJECT DESCRIPTION

Humboldt County (County) is requesting a General Plan Conformance Review for the proposed acquisition of 515 J Street (acquisition). The 0.3-acre (13,200 square-foot [sf]) property is located at the northeast corner of 6th and J Streets, approximately one-half block south of the Humboldt County Courthouse, and contains a 3,329-sf two-story building and parking lot (Figure 2).

The Humboldt County Conflict Counsel's Office has occupied the first floor since November 2024. The office handles felonies, misdemeanors, and juvenile cases¹, and currently provides legal defense for approximately 33% of court-appointed indigent² cases in the County. The location's proximity to the Courthouse facilitates in-person meetings and provides convenient access to court proceedings, supporting efficient case management by the office's 10 staff members.

The building was constructed sometime between 1949-55 and is not listed in the Local Register of Historic Places (LRHP). The building has primarily been used as a law office since 1973 and underwent a renovation in 2011. Some ADA improvements were completed in 2025 to support County use of the building. According to the Applicant, the second floor is currently unoccupied, but the County intends to house other programs there once additional ADA improvements—such as installation of a lift—are completed. No specific use for the second floor has been identified at this time.

¹ From 'Scales of Justice out of Balance?' Humboldt County Civil Grand Jury 2024-2025, Released July 30, 2025
<https://humboldt.gov/DocumentCenter/View/139944/SCALES-OF-JUSTICE-OUT-OF-BALANCE-HUMBOLDT-COUNTY-PUBLIC-DEFENDERS-OFFICE>

² A person is referred to as indigent when they are impoverished, or unable to afford the basic necessities of life. A defendant who is indigent has a constitutional right to court-appointed representation.
<https://www.law.cornell.edu/wex/indigent>

Figure 2: Site Map (515 J Street outlined in red)



APPLICABLE REGULATIONS

California Government Code §65402 requires the County, 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 July 28, 2025, and the 40-day response period ends on September 6, 2025.

GENERAL PLAN CONSISTENCY

2040 General Plan Land Use Designation

The land use designation for the property is Downtown Commercial (DC), defined as:

Mix of retail, restaurants, lodging, entertainment, cultural, visitor services, offices, and upper floor residential uses. Applied to the bulk of the Core Area, which serves as the traditional business and cultural center for the City. Intended to have a high intensity urban form, retain and enhance Eureka's identity and historic character, and promote a vibrant pedestrian environment. 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.

The DC designation supports a mix of uses—including offices—in an urban form that promotes pedestrian activity and reinforces Eureka's role as a cultural and governmental center. The Conflict Counsel's Office, which currently occupies the first floor, provides a vital public service and benefits from its proximity to the Courthouse. Although the second floor is currently

unoccupied, it will be used for future County programs once ADA improvements are completed. Office uses are permitted on the ground floor under the applied Downtown Zoning District, and the project involves reuse of an existing building with no major changes to its exterior, aligning with the General Plan's goals to preserve historic character and support high-intensity, civic-oriented downtown uses. The acquisition is consistent with the DC land use designation.

Goals and Policies

Staff has reviewed the 2040 General Plan (General Plan) and found the following relevant goals and policies³:

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

Partially Consistent. The acquisition supports multiple community-serving functions and preserves a civic use within the Core Area. The existing parking lot is accessible from both the alley and 6th Street, which partially aligns with the General Plan's urban form objectives. However, the parking lot occupies an intersection corner and street frontage, which does not advance the City's vision for continuous building frontages in the downtown core. As such, the acquisition partially supports Goal LU-I.

Policy LU-I.3 Beneficial Development. Support development that affords benefits to all segments of the community that:

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

Partially Consistent. The property is located in a pedestrian-oriented area within one block of a bus stop and two Class II Bikeways. While no designated parks are located within the vicinity, the Courthouse lawn and south-facing façade, and surrounding sidewalks function as informal civic space. The acquisition supports functional integration with these public areas by maintaining a civic use within an active, walkable setting. Continued governmental use reinforces the area's role as a civic hub. Because the property does not directly engage with formal public spaces such as parks or trails, it is considered partially consistent with the intent of this policy.

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

Partially Consistent: Approximately 165-feet, or 72%, of the street frontage on the corner of 6th and J Streets, borders a parking lot. While this does not meet the policy objective to replace such lots with building frontages, the County may choose to further develop the site in the future. Since the condition is existing and other nearby corner sites remain available for infill, the project is considered partially consistent with respect to this policy.

³ 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=

(l) Advances other City goals.

Consistent. The Conflict Counsel's Office provides essential legal services to indigent clients, supporting the well-being, health, and safety of the community. These functions advance broader General Plan goals related to public well-being and civic life, such as Goals LU-2 and E-3 described below.

Policy LU-1.18 Parking Access. Where feasible and desirable, require off-street parking to be accessed from alleys.

Partially Consistent. The site's single parking lot has a portion accessed from the alley, and the other portion accessed from 6th Street. While this policy encourages alley-only access, the presence of an alley entrance helps reduce the need for street-facing curb cuts, partially meeting the policy's intent.

Goal LU-2. A thriving, compact, and pedestrian oriented Core Area that serves as the heart of Eureka's civic, cultural, business and visitor activity and is appealing to new investment.

Consistent. The acquisition supports nearby businesses by maintaining, and potentially increasing, foot-traffic, and may incentivize new development by consolidating civic and legal services within the Core Area. The Conflicts Counsel's Office's clients, staff, and visitors in-turn benefit from downtown's walkability, access to transit, and nearby amenities. Therefore, the acquisition contributes to community benefits within the Core Area, consistent with Goal LU-2.

Policy LU-2.1 Core Area Uses and Activities. Support the following uses and activities within the Core area:

- (k) Professional and business services, such as attorneys, realtors, architects, engineers, investment specialists, and other professional fields that provide a daily customer base for the retail and food-related uses in the area.**
- (n) Government facilities and services consolidated into a regional center of civic offices, services, and functions.**

Consistent. Many professional legal support services benefit from close proximity to the Conflict Counsel's Office, such as notaries, bail bond agencies, and document preparation services. Businesses offering food, lodging, or other amenities benefit from serving the Office's clients, staff, and visitors. The acquisition reinforces the Core Area's function as a center for government services and professional support activities.

Policy LU-2.3 County Jail. Coordinate with Humboldt County to define and implement measures to beautify the site and minimize the physical and visual barrier between Old Town and Downtown created by the County Jail, and to reduce loitering and criminal activities within its proximity.

Consistent. While this policy focuses on the County Jail site that houses the courthouse, the acquisition will support the continued work of the Conflicts Counsel's Office by reducing travel time to and from the courthouse, improving casework efficiency, and shortening wait times to see an attorney, indirectly supporting the intent of this policy.

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

Inconsistent. While the acquisition contributes to civic efficiency by consolidating legal services in the downtown core, the site is already developed and located within city limits, and therefore not part of a new growth or annexation area. More importantly, because the County is not subject to many of the City's land use implementation tools described below under Policy LU-6.10, the acquisition limits the City's ability to shape the future use or redevelopment of the site, inconsistent with Goal LU-6.

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

Inconsistent. As a County acquisition, the site will no longer be subject to many City land use implementation tools, including zoning, design review, and master plan regulations. This reduces the City's ability to shape the future use or redevelopment of the site, making the project inconsistent with this policy. Therefore, the acquisition is inconsistent with Policy LU-6.10.

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

Consistent. The continued operation of the Conflict Counsel's Office downtown retains and supports professional legal employment and contributes to the vitality of the city's office-based economy. While government offices do not directly generate tax revenue, they help support nearby businesses and reinforce Eureka's position as the regional hub for legal and civic services.

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 retains and potentially expands professional office uses in the downtown, which supports the City's economic development goals and maintains Eureka's role as the region's center for civic and legal services, consistent with Policy E-3.8.

GOAL M-1. A model City for multi-modal transportation.

Partially consistent. The acquisition incentivizes development within the downtown area by consolidating public-sector services within a walkable and transit friendly downtown area, as described in Policy M-1.6 below. However, the acquisition limits the City's ability to discourage corner and street-fronting parking lots, as described in Policy M-5.4 below. Because the relevant policies may be found consistent and inconsistent with Goal M-1, the acquisition may be found to be partially consistent with the General Plan.

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 policies LU-2.3 and E-3.8 above, the acquisition consolidates public-sector services within the pedestrian- and transit-oriented downtown area incentivizing further development and economic activity within the area, 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.

Inconsistent. As discussed under policies LU-1.3(k) and LU-1.18 above, the corner- and street-fronting parking lots may remain in-place, depending on the County's plans to develop the property. Also, as discussed under Policy LU-6.10, the City (above), the acquisition limits the City's ability to encourage development of buildings on these lots. Therefore, the acquisition is inconsistent with this policy.

CONCLUSION

Staff has reviewed the 2040 General Plan and identified a subset of relevant Goals and Policies as they relate to the acquisition. As summarized in Table I below, the acquisition is consistent with the majority of applicable goals and policies. While minor inconsistencies exist—primarily related to surface parking and the City's limited authority over County-owned properties—they do not outweigh the overall alignment of the project with the General Plan's vision for civic-oriented, pedestrian-accessible downtown development.

Table I – Conformance Review Summary

GOAL / Policy	Title	Consistency	
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	–
Policy LU-1.3 (h)(k) and (l)	Beneficial Development	Partially Consistent	–
Policy LU-1.18	Parking Access from Alleys	Partially Consistent	–
GOAL LU-2	A thriving, compact, and pedestrian oriented Core Area that serves as the heart of Eureka’s civic, cultural, business and visitor activity and is appealing to new investment.	Consistent	✓
Policy LU-2.1 (k) and (n)	Core Area Uses and Activities	Consistent	✓
GOAL LU-6	New growth and annexation areas that are carefully planned, efficient, and contribute positively to the community.	Inconsistent	✗
Policy LU-6.10	City Control	Inconsistent	✗
GOAL E-3	Abundant opportunities to facilitate the establishment and expansion of key job and revenue generating uses within the City.	Consistent	✓
Policy E-3.8	Expanded Office-Based Business Sector	Consistent	✓
GOAL M-1	A model City for multi-modal transportation.	Partially Consistent	–
Policy M-1.6	Dense Development	Consistent	✓
Policy M-5.4	Parking Lot Location	Inconsistent	✗

Based on the analysis above, the finding can be made the acquisition is substantially consistent with the General Plan. Therefore, staff recommends the Planning Commission find the General Plan Conformance Review to be **substantially consistent** with the City’s 2040 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.

The County of Humboldt

The County's acquisition constitutes a discretionary action by a public agency and is subject to CEQA. The County, as Lead Agency, has not yet made a CEQA determination, but anticipates finding the acquisition of property exempt from detailed review under CEQA Guidelines §15061(b)(3) (Common Sense) and §15301 (Existing Facilities). Any future proposed redevelopment of the property would be subject to additional CEQA review.

DOCUMENTS ATTACHED

Attachment 1: Resolution

Attachment 2: Humboldt County GPC Request