



City and Borough of Juneau, Alaska Historic Resources Advisory Committee

December 11, 2023

Subject: Telephone Hill Redevelopment Plan

Honorable Mayor Weldon and Assembly:

The Historic Resources Advisory Committee (HRAC) is an Assembly appointed citizen committee established in the Land Use Ordinance (Title 49.10.410). One of the primary duties of HRAC is to advise the Assembly when historic resources of the community may be affected by proposed development. Telephone Hill is identified as an historic neighborhood in the CBJ Historic and Cultural Preservation Plan (Adopted Ordinance 2020-07). The Telephone Hill Redevelopment (THR) project, currently in a planning process, has the potential to negatively impact this historic neighborhood.

HRAC has been inquiring about the planning process since consultants were hired to proceed, especially concerned about analysis of the value and potential impacts to historic properties within the neighborhood. The understanding is that the process would include a study of the historic resources using the generally accepted criteria of Section 106 of the National Historic Preservation Act of 1966 as amended. This process has four primary steps:

1. Initiate consultation by notifying interested parties, i.e. local government entities, HRAC, local tribal entities, local historic societies, etc.
2. Identify historic properties of the project site and adjacent area and evaluate those resources for eligibility to be listed in the National Register of Historic Places.
3. Determine if there will be adverse impacts to historic resources determined eligible.
4. If adverse impacts are expected, resolve by avoiding, minimizing, or mitigating the loss of resources.

It should be noted that a determination of eligibility or listing in the National Register does not preclude property rights. Witness the recent demolition by property owners of the Elk's Hall – a National Register building within the Downtown National Register Historic District.

Community Development Department (CDD) staff has indicated to HRAC the Section 106 process has begun. However no formal notice has been given to HRAC or others per Step 1. Also, there has been no schedule of completion of the Section 106 process nor identification of when interested parties would have the opportunity for review and comment on draft findings. Yet, CDD has indicated the entire planning process would be complete in December 2023. The appropriate timeline would have the Section 106 process completed prior to formalizing a plan to allow consideration of the Section 106 findings.

Since the announcement of the THR project, HRAC has heard questions and public testimony at numerous regular meetings about the project and public process. The public expressed numerous concerns about the planning process of this high-profile project including the following:

1. Transparency of the process and easily accessible information related to the project. A search of relevant web sites (CBJ Main Site; Lands and Resources web page; CDD web page; First Forty Feet (consultant) website; MRV Architects (local liaison consultant) website) failed to find any

- information about the project or planning process. Public attendees at the HRAC meetings had no idea the Section 106 process had begun and that they should have a right to comment on the findings.
2. Distribution of inaccurate information about the project. At the first two public meetings; in CBJ documents; and in public media articles the consultant quoted as saying that “none of the homes in the area are eligible for historic recognition because they have been modified.” The Section 106 process is not complete thus this statement is premature and misleading. A 1984 Historic Site and Structures Survey determined that some of the houses were not eligible as individual buildings, but the neighborhood was eligible as a National Register Historic District. The Assembly Legislative Priorities for 2024 included Telephone Hill Redevelopment where it states “This project will include ... demolition of existing structures ...” yet the Section 106 process to evaluate the historic structures has not been completed.
 3. The premature and misleading statements about the historic buildings may have influenced answers to polls and comments about preferences for future development at the site. If it is a foregone conclusion that the buildings have no historic value and will be demolished, the public is likely to see preservation as not an option. The Section 106 process should be completed prior to declarations that the buildings have no historic value as it is critical information for consideration of future development options.

Good public process provides easily accessible information about the project; adequate public notice of meetings and project schedule; and reasonable opportunity for input and expression of interest by members of the general population. The public has expressed to HRAC in very strong statements their dissatisfaction with the quality of the process and opportunity to speak about the project. Considering the public comments heard by HRAC, it is recommended the Assembly take the following actions:

1. Provide complete project information to the public through easily accessible website(s) as well as accurate press releases for local news media.
2. Issue press releases correcting the inaccurate public statements made regarding the premature conclusions that none of the buildings on Telephone Hill have historic value. Explain that the Section 106 process information will be available to the public for review and comment prior to finalization.
3. Add additional opportunities for the public to weigh in after the inaccuracies have been corrected and the Section 106 review has been distributed.
4. Provide more opportunity for public discussion about the project as opposed to cell phone polls. HRAC heard that the public wants opportunities to discuss and evaluate the various development options and that one option should include retaining the historic buildings.
5. Pause decisions on how to proceed with the THR project until receiving recommendations from the Historic Resources Advisory Committee following the completion of the Section 106 review.

We appreciate your consideration of our recommendations,

Sincerely;



Shannon Crossley, Vice-Chair

Note: Chair Zane Jones, employed by MRV Architects, declared a conflict.