



DATE: June 3, 2024
TO: Michele Hale, Deputy Mayor
THROUGH: Katie Koester, City Manager
FROM: Nick Druyvestein, Project Manager
SUBJECT: Section 106 Process for Telephone Hill

The purpose of this memo is to summarize the Section 106 process for the Assembly and explain the ways the project will be documenting the history of the neighborhood.

Section 106 of the National Historic Preservation Act requires federal agencies to consider the effects of projects on historic properties. Since the CBJ is not a federal agency, it is not required to complete a Section 106 review as part of the Telephone Hill project. At the February 12th, 2024 Committee of the Whole, the Assembly gave direction to not pursue a Section 106 review because it was unnecessary for planning purposes and short-term goals. If a future project on the site were to use state or federal funding, the agency administering the grant would need to complete the Section 106 review. They would do so with the information available at the time. For example, an affordable housing development spending federal dollars would have to perform a Section 106 to meet the conditions of the grant, regardless of what CBJ does now. The general steps for a Section 106 review are as follows:

1. **Initiation and Identification:** a federal agency identifies a proposed project that may affect properties listed or eligible for listing in the Nation Register of Historic Places.
2. **Assessment:** The agency assesses the potential effects of the project on the identified historic properties.
3. **Consultation:** Interested parties, including the public, Native tribes, State Historic Preservation Office (SHPO), and other stakeholders, are consulted to seek input on the project's potential effects on historic properties and explore mitigation measures.
4. **Resolution:** If adverse effects are identified, the agency and consulting parties work to develop measures to avoid, minimize, or mitigate those effects. (Steps 3 and 4 are the most time consuming elements of a Section 106 review and because of the back and forth on eligibility and mitigation).
5. **Documentation:** Section 106 review process is documented in a memorandum of agreement (MOA) or other agreement document.
6. **Monitoring:** Monitoring may be required for project implementation to ensure compliance with the terms of the agreement. Periodic reporting on the projects effects on historic properties may also be necessary.

[The Culture Resource Desktop Assessment](#) completed by Northern Land Use Research Alaska (NLURA), dated February 1st, 2024, fulfills the Initiation and Identification steps to this process. Additional historical

documentation on this property includes the [1984 Site and Structures survey](#) and the [Historic Building Survey by MRV](#). Although CBJ does not intend to go through the process of registering with the Federal government for a full-blown Section 106 review, we will be performing Record Photo documentation of the interiors and exteriors of the buildings and of the neighborhood and preparing plan sketches of the buildings to show current configuration. This preserves the historical record of the neighborhood for future generations with little impact to the timeline and budget.

Recommendation: Informational Only