

MEMORANDUM

CITY/BOROUGH OF JUNEAU
155 South Seward Street, Juneau, Alaska 99801

DATE: October 3, 2007

TO: Planning Commission

FROM: Susana Montana, Planner *Susana Montana for*
Community Development Department

RE: Review of changes to Implementing Actions of Chapter 4, Housing Element, of the July 2007 Draft CBJ Comprehensive Plan.

FILE NO.: TXT2006-00003: Comprehensive Plan Text and Land Use Map Amendments

On July 17, 2007 the Planning Commission and the Affordable Housing Commission (AHC) reviewed the Housing Element, Chapter 4, of the February 20, 2007 Draft Comprehensive Plan (Draft Plan). The two Commissions recommended changes to the Policies of Chapter 4 which were incorporated into a revised Draft Plan entitled the "July 2007 CBJ Comprehensive Plan—Draft for Planning Commission Review and Comment". The two Commissions did not complete their review of the Housing Element on July 17th and requested another session to complete their review of the Standard Operating Procedures (SOPs), Development Guidelines (DGs) and Implementing Actions (IAs) of Chapter 4. Representatives of the AHC met with the Planning Commission on September 18, 2007 and reviewed housing-related SOPs, DGs and IAs of Chapters 3 and 4, but did not complete their review of Chapters 4 or 10. The Planning Commission met again on September 25, 2007 and completed its review of the Chapter 4 SOPs, DGs and IAs but did not begin their review of housing-related IAs of Chapter 10. The Commission made changes to the IAs of Chapter 4 and provided guidance for staff to make further changes for Commission review.

Attachment A to this staff report contains the changes to Chapter 4 which were made by the Commission on September 18th and 25th, as well as staff-recommended changes based on Commission guidance. The Implementing Actions that the Commission asked staff to draft language for are noted by **highlighted text**.

Staff recommends that the Commission review housing-related IAs of the Land Use Chapter 10 as part of its review of Chapter 10 and the Chapter 11 Land Use Maps, scheduled for December 18, 2007. As such, the Chapter 10 housing-related IAs are not included in this packet.



Attachment A

Housing-related Policies, Standard Operating Procedures, Development Guidelines and Implementing Actions of the July 2007 Draft CBJ Comprehensive Plan.

Some policies and implementing actions (IAs) of the 1995 Comp Plan have been carried over to the 2007 draft Plan. Where that happens, the number of the 1995 Policy or IA is noted at the end of the sentence in [brackets]. Standard Operating Procedures (SOPS), Development Guidelines (DGs) and Implementing Actions (IAs) without a 1995 notation in brackets are new and an explanation or planning rationale for that new item is presented. Staff comments on the July 2007 proposed SOP, DG or IA are noted after the item in brackets and in this font type. Attachment A reflects the Planning Commission's changes as of September 25, 2007.

Chapter 4: Housing Element

POLICY 4. IT IS THE POLICY OF THE CBJ TO FACILITATE THE PROVISION AND MAINTENANCE OF SAFE, SANITARY AND AFFORDABLE HOUSING FOR ITS RESIDENTS.

Standard Operating Procedures

4.1. Fund, or assist in securing funding for, emergency shelters, transitional housing, permanent supportive housing, and appropriate supportive services for people who are homeless or near homeless, particularly families and unaccompanied youth.

Implementing Actions

4.2. Support funding mechanisms that can create new rental housing, such as CBJ housing bonds, a local land and/or housing trust, or tax increment financing.

4.3. Advocate for the use of federal Community Development Block Grant monies to be used to provide low interest housing rehabilitation loans.

4.4. Investigate potential new financing strategies for new affordable housing development.

[These funding-related IAs were moved to Policy 4 from IA 4.1.8 (now 4.2), IA 4.3.11 (now 4.3) and IA 4.5.8 (now 4.4).]

4.5. Report, on an annual basis, the inventory of housing stock and vacancy rates in the CBJ, new housing permit review and construction activity, and any loss of housing due to demolition, abandonment and conversion of dwelling units to non-residential use or, to the extent possible to track, to non-year-round occupancies.

4.6. Update the CBJ Housing Situation Report every two years and monitor change in housing conditions and assess whether policies, programs, guidelines and other mechanisms are achieving their objectives.

4.7. Facilitate the provision of “special needs” housing and their supportive services in residential neighborhoods that are readily accessible to public transit, shopping, public amenities and supportive services.

4.8. The CBJ should participate with other local agencies to prepare and adopt a “Ten Year Plan to End Homelessness”, sponsored by the United States Interagency Coalition on Homelessness.

4.9. Assist in the establishment and maintenance of an effective integrated client assessment and referral system for homeless and near-homeless residents which links all housing, medical and social service providers to develop greater efficiencies, client tracking and program funding and evaluation tools. [Please also see IA 13.2.4 of Chapter 13 of this Plan.]

POLICY 4.1. IT IS THE POLICY OF THE CBJ TO FACILITATE THE PROVISION OF AN ADEQUATE SUPPLY OF VARIOUS HOUSING TYPES AND SIZES TO ACCOMMODATE PRESENT AND FUTURE HOUSING NEEDS FOR ALL ECONOMIC GROUPS.

Standard Operating Procedures

4.1.1. Designate on the Comprehensive Plan Land Use Maps adequate sites and supporting infrastructure within the Urban Service Area Boundary (USAB) to accommodate a diversity of housing types, size, price and types of neighborhood scale and character to satisfy the desires of all residents.

[Please note that the HUD grant application “check list” asks if the Comprehensive Plan has a Housing Element which addresses this issue and concern; therefore we left this SOP in Chapter 4 even though it is a redundancy of the Land Use Chapter 10 SOP 10.2.]

4.1.2. Vacancy rates for all types of CBJ housing units should not fall below 5 percent. The CBJ should monitor the inventory of all types of housing and should focus efforts, funding and resources on producing the types of housing that have not yet reached this threshold.

4.1.3. Once a 5 percent vacancy rate, per housing type, is established, the CBJ should seek and facilitate new housing production, for all types, at an annual rate that mimics the growth rate of new households in the CBJ, in order to maintain this 5 percent vacancy rate objective.

Implementing Actions

4.1.4. Upgrade the CDD capability to track and monitor development activity and vacancy rates. Refine the CDD vacancy analysis, and its ability to estimate CBJ housing demand by type of housing. Track the impact of mining development and tourism on the housing stock and vacancy rate.

4.1.5. Review planned unit development (PUD) provisions in the Land Use Code to ensure maximum opportunity for flexible siting, design, and construction of residential developments. Clustering of new structures and provision of mixed densities within each new subdivision should be encouraged.

4.1.6. Provide land use incentives, such as increased densities and building heights and lowered parking requirements, to induce the private sector to build Single Room Occupancy (SRO) or “efficiency” or “compact living unit” developments in Downtown Juneau, in Mixed Use Districts, in shopping centers, and near the University.

4.1.7. Conduct an inventory of dwelling units that are kept off the year-round rental market. The CBJ should investigate incentives to encourage those property owners to rent those units year-round, particularly units suitable for students, workers or legislative staff.

4.1.8. Investigate ways to encourage preservation of rental housing and avoid its conversion to transient housing or non-residential uses.

4.1.9. Encourage the preservation, rehabilitation and year-round occupancy of Downtown Juneau upper-level rental housing units in mixed use buildings.

4.1.10. Support increasing the supply of low-income affordable rental housing by providing CBJ-owned land at discount prices to for-profit and non-profit housing developers as well as needed infrastructure (water, sewer, roads), higher densities and, where appropriate, higher building heights.

4.1.11. Investigate the costs, benefits and implications to the CBJ affordable housing market of adopting a new Comprehensive Plan policy to encourage new housing and major rehabilitation of existing housing to be designed with a wide doorway, at least one zero-step entrance, and a first-level bathroom which responds to Universal Design and Visitability principles. Exceptions to such a policy would be housing on parcels where terrain would not permit wheelchair accessibility.

POLICY 4.2. IT IS THE POLICY OF THE CBJ TO DESIGNATE ON LAND USE MAPS AN ADEQUATE SUPPLY OF BUILDABLE LAND WITHIN THE URBAN SERVICE AREA, AND PARTICULARLY ALONG TRANSIT CORRIDORS, FOR RESIDENTIAL USE AT DENSITIES THAT CAN PRODUCE HOUSING AFFORDABLE TO ALL ECONOMIC GROUPS.

Standard Operating Procedure

4.2.1. Continue to monitor and, when necessary, designate an adequate amount of vacant land for residential development on the Comprehensive Plan Land Use Maps. Densities within the USAB and New Growth Areas should foster compact development at medium- to high-densities. As a target goal for compact development, a minimum density of ten dwelling units per acre for residentially zoned lands within the USAB would make prudent and efficient use of these limited land resources. A density of 30 dwelling units per acre, or greater, along transit corridors is recommended to produce affordable housing and to make efficient use of transit services therein.

Implementing Actions

4.2.2. Amend the Title 49 Land Use Code to allow rezoning requests to medium-to-high density districts within the Urban Service Area to be requested by a property owner at any time of the year. The rezoning request should be accompanied by a conceptual development plan that outlines access routes, internal circulation, connections to adjacent subdivisions or neighborhoods, building sites, densities, buffer zones, recreation and open space/natural areas facilities, if appropriate, and parking areas. The conceptual plan should provide assurances for adequate privacy and buffers to mitigate any potential project-specific noise, light and glare, or privacy concern that may affect an adjacent residential neighborhood(s). The Applicant should also provide assurances that the development would not exacerbate Levels of Service (LOS) at intersections serving the proposed project where, at the time of application, the LOS is "D" or worse. **[Staff suggests that the last sentence, referencing LOS, should be deleted and replaced with the following language:**

“Maximum block sizes (dimensions and land area) in new subdivisions and major developments should be designed to support a network of pedestrian, bicycle and other non-motorized transport/circulation systems therein and should link those internal networks to adjacent neighborhoods.” **This would better address a sustainability objective of Chapter 2.]**

4.2.3. Amend the Land Use Code to provide for an Affordable Housing Overlay District (AHOD) as a zoning map amendment which could lie upon any parcel located within the Urban Service Area. The AHOD would allow higher densities than the underlying zoning designation and may adjust development standards, where appropriate, for projects which include housing affordable to low-income households (Below Market Rate—BMR—units). The numbers of BMR units provided, and the income levels to serve, would be determined on a case-by-case basis for each AHOD, based on criteria established by the AHOD ordinance, such as a targeted housing sector need. The development standards which could be adjusted would also be determined on a case-by-case basis for each AHOD development, based on criteria and considerations established by the AHOD ordinance, such as site terrain and surrounding land use patterns. The Applicant should also provide assurances that the development, with mitigation measures, would not exacerbate Levels of Service (LOS) at intersections serving the proposed project where, at the time of application, the LOS is “D” or worse.

4.2.4. Designate suitable land within one-quarter mile distance from public transit routes from Auke Bay to Downtown Juneau to designate as a Transit-Oriented Development zoning district within which medium-to high-density housing in wholly residential or mixed use developments and with lesser parking requirements would be allowed. Such lands may qualify for higher building heights by the Planning Department and Assembly pursuant to a zoning map amendment, provided that the results of a view corridor analysis of the proposed building height does not reveal obstruction of a valued public vista, such as public views of the shoreline and water from Glacier Highway in the Auke Bay area to its transition at Brotherhood Bridge to Egan Drive, and from Egan Drive to Downtown Juneau. The area of Douglas Island from the Juneau-Douglas Bridge to the terminus of St. Anns Street is well-served by public transit and may be suitable for designation as a Transit Oriented Development zone as well.

4.2.5. Encourage high-density Transit Oriented Developments and/or Mixed Use Developments in existing or new shopping centers and office parks.

POLICY 4.3. IT IS THE POLICY OF THE CBJ TO FACILITATE THE PRESERVATION AND REHABILITATION OF EXISTING HOUSING, PARTICULARLY HOUSING AFFORDABLE TO LOW- INCOME RESIDENTS.

Implementing Actions

4.3.1. Publish a bi-annual inventory and analysis of the CBJ rental housing stock and assessment of need for rental housing by CBJ residents.

4.3.2. Adopt building and fire code standards for housing rehabilitation that are reasonable in cost and continue to meet acceptable levels of public health and safety.

4.3.3. Adopt local building codes to encourage use of “life cycle” low cost, energy efficient construction techniques, materials and equipment that are consistent with acceptable health and safety standards and cognizant of local climatic conditions.

4.3.4. The CBJ should investigate ways to encourage property owners to maintain habitable rental dwelling units in residential use.

4.3.5. Identify and inventory substandard housing, including pre-1976 mobile homes that do not comply with HUD standards of habitability, and pursue strategies to rehabilitate or replace these units with safe, sanitary and HUD-compliant units.

4.3.6. Improve the quality of housing and neighborhoods by educating landlords, tenants and property owners about health and safety code requirements and property maintenance Best Management Practices and by enforcing code compliance when necessary.

4.3.7. Identify and zone appropriate land areas within the USAB for new and/or replacement manufactured home parks or subdivisions.

4.3.8. Continue to subsidize qualifying low and moderate income affordable residential rehabilitation through State and Federal funds to conserve existing housing stock. When rehabilitating these units, incorporate appropriate features that address Universal Design/ Visitability principles. Depending upon the level of rehabilitation, these features could include wide doorways, at least a half bath on the main floor, accessible placement of electrical controls, and at least one zero-step entrance to the building.

POLICY 4.4. IT IS THE POLICY OF THE CBJ TO MAINTAIN THE LONG-TERM AFFORDABILITY OF DWELLING UNITS DESIGNATED AFFORDABLE AS A CONDITION OF APPROVAL FOR THE GRANTING OF A REZONING, INCREASED BUILDING HEIGHT, REDUCED PARKING, OR OTHER ECONOMIC BENEFIT TO THE DEVELOPMENT PROJECT.

Implementing Action

4.4.1. Pursue mechanisms for assuring affordability consistent with the findings associated with an inclusionary affordable housing study per Implementing Action 4.5.4.

POLICY 4.5. IT IS THE POLICY OF THE CBJ TO FACILITATE AND ASSIST IN THE DEVELOPMENT OF AFFORDABLE HOUSING.

Development Guideline

4.5.1. When designing a new affordable dwelling unit, take into consideration “life cycle” cost savings which consider the “first” costs of materials and equipment and the recurring operating costs related to home heating, energy consumption and the replacement of building elements such as siding, roofs and windows. Using quality materials and finishes will maximize performance and reduce replacement costs. Encourage compact development of multi-dwelling units to make extending

utilities, roads and pathways less costly and to maximize the efficient use of buildable land. The location, orientation and design of each unit on the land should maximize daylight and privacy for occupants while facilitating a sense of community among all occupants of the development.

Implementing Actions

4.5.2. Inventory, assess, and make available suitable CBJ-owned lands within the Urban Service Area to transfer to for-profit and/or non-profit residential development corporations that would result in new construction of low- and moderate-income affordable housing. Strategies may include development of mixed income housing with higher priced homes which can subsidize development costs to achieve lower-priced homes to be set aside for low and moderate-income households. Strategies may also include land trades and land trust agreements.

4.5.3. When feasible, provide property tax relief for housing developments which are owned and operated by non-profit corporations and in which the units are leased to senior (over the age of 65) and low-income households, provided these savings are passed-through to the tenants in the form of lower rental rates or housing costs.

4.5.4. The CBJ should immediately conduct an analysis of inclusionary affordable housing zoning standards, criteria and requirements that could be suitable for application in the CBJ.

4.5.5. Streamline the residential development permitting process. Coordinate the review of residential developments and affordable housing projects and provide continuity and timeliness in their review by all affected CBJ departments and divisions.

4.5.6. Investigate the feasibility of reducing permit fees for dwelling units designated as long-term affordable housing for low and moderate-income households.

4.5.7. Create a program of seminars where private parties and developers can be trained in permitting procedures and the CBJ building and development permitting process for all types of residential developments. Include in this program, when possible, training by staff from other relevant permitting agencies such as DEC, the Corps, and DOT.

POLICY 4.6. IT IS THE POLICY OF THE CBJ TO ENCOURAGE PRESERVATION OF RESIDENTIAL STRUCTURES THAT ARE ARCHITECTURALLY AND/OR HISTORICALLY SIGNIFICANT TO THE CBJ AND WHICH CONTRIBUTE TO THE HISTORIC AND VISUAL CHARACTER AND IDENTITY OF THE NEIGHBORHOOD.

[The former SOPs 4.6.1 and 4.6.2, related to University housing, were moved to Chapter 5, Economic Development, section addressing the University of Alaska Southeast, SOPs 5.4.3 and 5.4.4.]

Implementing Actions

4.6.1. Identify residential properties of historical significance, using the Downtown Historic District Development Plan and other sources, and seek public and private funding sources for rehabilitation of these properties, and assist owners in obtaining these funds.

4.6.2. In developing new zoning or development standards in areas with concentrations of historic structures, ensure that relaxed standards, such as higher building heights, do not induce a property owner to demolish the historic structure in favor of a larger structure or development.

[After moving 4.6.1 and 4.6.2 to Chapter 5, the former 4.6.3. was split into two to form 4.6.1 and 4.6.2.]

POLICY 4.7. IT IS THE POLICY OF THE CBJ TO BALANCE THE PROTECTION AND PRESERVATION OF THE CHARACTER AND QUALITY OF LIFE OF EXISTING NEIGHBORHOODS WITHIN THE URBAN SERVICE AREA WHILE PROVIDING OPPORTUNITIES FOR A MIXTURE OF NEW HOUSING TYPES.

Development Guideline

4.7.1. When reviewing rezoning applications within the Urban Service Area, higher densities than are found on adjacent or surrounding properties should be deemed consistent and harmonious with the character of the neighborhood, provided that the overall scale and massing of the new development is compatible with the neighborhood and the siting and/or design of the new structure(s) assures the privacy, light and air of its neighbors. [Please also see DG 10.3.1 and Policy 10.5 in Chapter 10]

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WASTEWATER DISPOSAL

CONDOMINIUM INTERESTS IN THE SUBDIVISION HAVE BEEN FORMED IN ACCORDANCE WITH THE SUBDIVISION ACT AND THE WASTEWATER DISPOSAL ACT. THE WASTEWATER DISPOSAL PLAN FOR THIS SUBDIVISION IS SET FORTH IN THE PLANS AND SPECIFICATIONS WHICH ARE PART OF THE SUBDIVISION RECORD. THE SUBDIVISION RECORD IS FILED IN THE OFFICE OF THE CLERK, CITY AND BOROUGH OF JUNEAU, ALASKA, UNDER THE RECORD NUMBER 91-16-91. THE WASTEWATER DISPOSAL PLAN IS SUBJECT TO THE APPROVAL OF THE JUNEAU BOARD OF HEALTH AND THE JUNEAU DEPARTMENT OF ENVIRONMENTAL CONSERVATION. THE SUBDIVISION RECORD IS FILED IN THE OFFICE OF THE CLERK, CITY AND BOROUGH OF JUNEAU, ALASKA, UNDER THE RECORD NUMBER 91-16-91.

NAME AND TITLE OF A.P.E.C. A. JUNEAU OFFICIAL DATE 9-16-91



SURVEYOR'S STATEMENT

I HEREBY CERTIFY THAT THE SURVEYOR HAS BEEN LICENSED BY THE BOARD OF PROFESSIONAL SURVEYORS OF THE STATE OF ALASKA AND THAT THIS PLAN REPRESENTS A SURVEY MADE BY ME OR UNDER MY SUPERVISION. I HAVE PERSONALLY CHECKED THE CORNER MONUMENTS AND THE LIMITS OF THE SURVEY. I HAVE ALSO CHECKED THE RECORDS OF THE PREVIOUS SURVEYS AND THE DEEDS AND EASEMENTS AFFECTING THE PROPERTY AND THE RELATIVE BEARINGS AND DISTANCES ARE CORRECT AND ACCURATE. ALL DIMENSIONAL DATA ARE SET IN PLACE AND NOTED ON THIS PLAN AS PRESCRIBED.

Douglas Finley 9-16-91

PLANNING COMMISSION APPROVAL

I HEREBY CERTIFY THAT THE SUBDIVISION PLAN SHOWS HEREON HAS BEEN FOUND TO COMPLY WITH THE SUBDIVISION REGULATIONS AND THAT THE SUBDIVISION RECORD IS FILED IN THE OFFICE OF THE CLERK, CITY AND BOROUGH OF JUNEAU, ALASKA, UNDER THE RECORD NUMBER 91-16-91 AND THAT THE SUBDIVISION RECORD IS FILED IN THE OFFICE OF THE CLERK, CITY AND BOROUGH OF JUNEAU, ALASKA, UNDER THE RECORD NUMBER 91-16-91.

DATE 9-16-91

ATTEST: *[Signature]*
CLERK, CITY AND BOROUGH OF JUNEAU PLANNING COMMISSION

OWNERSHIP CERTIFICATE

WE HEREBY CERTIFY THAT WE ARE THE OWNERS OF THE PROPERTY SHOWN AND DESCRIBED HEREON AND THAT WE HEREBY ADAPT THIS PLAN OF SUBDIVISION TO THE CITY AND BOROUGH OF JUNEAU, ALASKA, AND OTHER SPACES TO PUBLIC USE AS NOTED.

DATE 9-16-91

[Signatures of Owners]
OWNERS

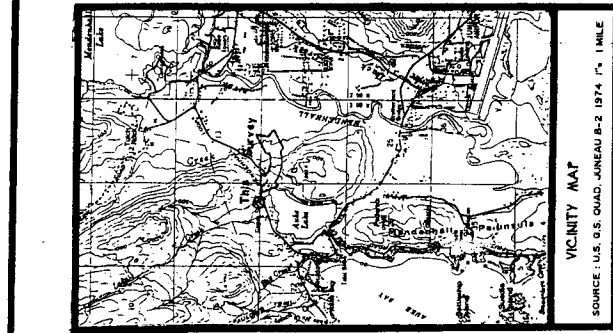
NOTARY'S ACKNOWLEDGEMENT

UNITED STATES OF AMERICA STATE OF ALASKA
THIS IS TO CERTIFY THAT ON THIS 16th DAY OF SEPTEMBER 1991, I HAVE PERSONALLY SEEN AND KNOWN THE UNDERSIGNED APPEARING AND I HAVE KNOWN THEM TO BE THE PERSONS WHOSE NAMES ARE SET FORTH IN THE FOREGOING INSTRUMENT AND ACKNOWLEDGED TO ME THAT THE INSTRUMENT WAS THEIR OWN AND THEY HAVE VOLUNTARILY SIGNED AND SEALED THE SAID INSTRUMENT AND HAVE READ AND UNDERSTAND THE CONTENTS THEREOF AND THEY HAVE READ AND UNDERSTAND THE CONTENTS THEREOF AND THEY HAVE READ AND UNDERSTAND THE CONTENTS THEREOF AND THEY HAVE READ AND UNDERSTAND THE CONTENTS THEREOF.

DATE 9-16-91
NOTARY PUBLIC FOR ALASKA
BY COMMISSION EXPIRES 12/31/95

NOTES

1. PER CODE AND LAND USE CODE REQUIREMENTS FOR ACCESS, INCLUDING THE CONSTRUCTION OF AN ACCEPTABLE DRIVEWAY, SHALL BE MET PRIOR TO ISSUANCE OF ANY BUILDING PERMIT FOR DEVELOPMENT OF INDIVIDUAL LOTS.



VICINITY MAP

SOURCE: U.S.G.S. QUAD, JUNEAU-B-2 1974, 1:62,500

NOTES - CONTINUED

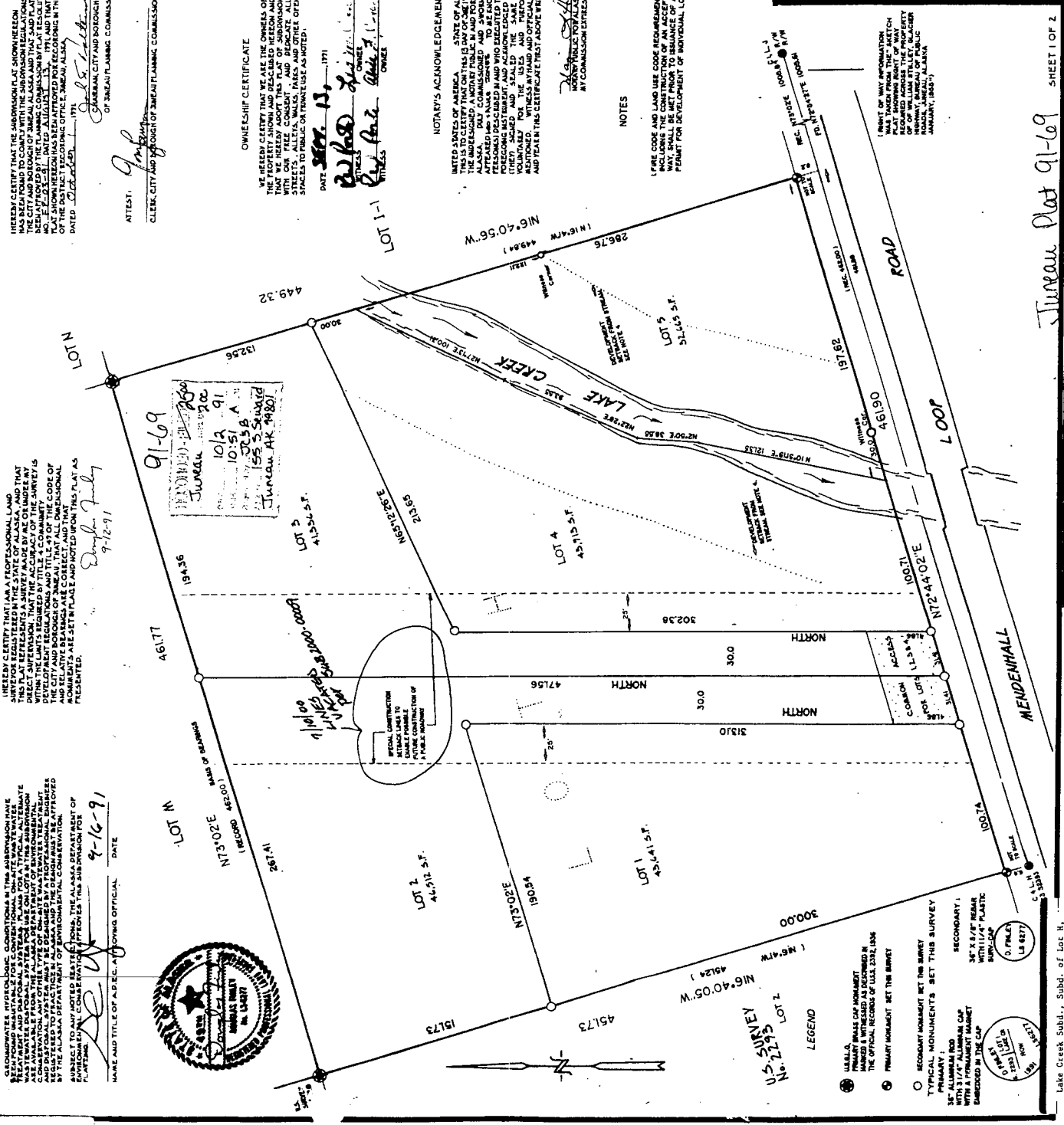
2. LOTS 1, 2, 3 & 4 WILL SHARE A SINGLE COMMON ACCESS TO MENDENHALL LOOP ROAD.
3. RESPONSIBILITY FOR MAINTENANCE OF THE DRIVEWAY SHALL BE EQUALLY BY THE OWNERS OF LOTS 1, 2, 3 & 4.
4. SPECIAL SETBACK REQUIREMENTS: CONSTRUCTION ON LOT 3 WILL NOT BE PERMITTED WITHIN 25 FEET OF THE EXISTING DRIVEWAY, WITHIN 20 FEET OF THE EAST LINE OF LOT 1, NORTH OF THE EXISTING DRIVEWAY, WITHIN 10 FEET OF THE EAST LINE OF LOT 2, NORTH OF THE EXISTING DRIVEWAY, AND WITHIN 10 FEET OF THE WESTERLY BOUNDARY OF LOT 4. ALL SHALL BE REGARDED AS FRONT YARDS FOR SETBACK PURPOSES.
5. EASEMENTS FOR SETBACK PURPOSES ARE PERMITTED WITHIN 50 FEET OF LAKE CREEK, WITHIN 10 FEET OF LAKE CREEK, AND WITHIN 10 FEET OF LAKE CREEK.
6. RECORD TO EASEMENTS AND RESTRICTIONS OF RECORD.

SCALE



PLAT OF LAKE CREEK SUBDIVISION
A SUBDIVISION OF LOT H, U.S. SURVEY No. 2392, IN THE CITY & BOROUGH OF JUNEAU, ALASKA

JUNEAU, ALASKA RECORDING DISTRICT	
OWNERS:	152 JONES & ALICE JONES 1472 W. G. ST. JUNEAU, AK 99801
SCALE:	1" = 40'
DATE:	JULY 11, 1991
DOUGLAS FINLEY LAND SURVEYING 820 SIXTH STREET, JUNEAU, AK 99801	



Juneau Plat 91-16-91 SHEET 1 OF 2

ATTACHMENT C

1591-01-095-A-00844-4