	A	B	C
1	**HHF Comments and Responses on the PA**		
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3	**Number**	**PA Page Number**	**Comment**
4	1	Misc.	PA circulated a year after consultation meetings
5	2	Misc.	Deficiencies in the PA noted by HHF have not been correted in the latest version.
6	3	Misc.	Comments requested within 9 working days
7	4	Page 1	Addition of the Navy as a signatory to the PA
8	5	Page 6	Navy's responsibility
9	6		Navy's involvement in proposed mitigation

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3	**Response**
4	The consulting parties have been in informed on progress on the PA through emails by FTA since May 2010 and updates provided by other signatories during regular historic preservation calls. As you know, consultation can be more than meetings held in teleconferences. Although, FTA consulted with the SHPD and the ACHP a few times between the consulting party meetings held between November 2009 and May 2010, not many changes to the PA occurred. FTA was more focused during that time period on project concerns adjacent to the airport. Consulting parties have been encouraged to contact FTA if they had any questions and also received a draft of the Programmatic Agreement to comment on in the Final EIS. Also, FTA continues to be informed of consulting parties' concerns, which have been relayed to FTA by other signatories or as a result of phone calls and other consultation meetings attended by ACHP.
5	Comments made by HHF have been considered and addressed as best as possible. Although there may be issues that have not been resolved exactly to HHF's preference, the process has benefitted from all consultations held to date.The modified draft PA that has been submitted to the consulting parties represents the result of a lengthy, comprehensive and productive consultation process that FTA's hopes that all the consulting parties can take pride in.
6	The content and the context of the PA has remained largely unchanged compared to the version distributed to the consulting parties in November 2009. Your comments are to this PA are timely and appreciated.
7	The Navy is included because, though they were not active participants during the height of the consultation process, they did participate. They are also included because part of the Project affects Navy property which gives them standing.
8	The latest PA reflects the wording the Navy requested for its role. No evaluation or mitigation of a resource on Navy property will occur without Navy involvement.
9	No mitigation can be implemented without the Navy's participation on resources within the Navy's jurisdiction.

	A	B	C
10	7	Misc.	Effect of the RTA
11	8	Attachment to the PA	Effects determination
12	9	Available on the Project website	Historic Effects Report availability
13	10	Attachment to the PA	Effects determination
14	11	APE - Attachment to the PA	Makalapa Housing

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10	The Honolulu Authority for Rapid Transportation (HART) does not take effect until July 2011, so there is not yet another agency. When that happens, HART will be responsible for all Project activities, including the PA. Still, HART will be a semi-autonomous agency and will be required to coordinate with other City agencies for work in other departments.
11	FTA has determined that the Project will have adverse effects to 33 historic resources. Included in these 33 are adverse effect determinations recommended by the SHPO and accepted by FTA. The SHPO did not provide the basis for these determinations. Therefore, general effects to the resources are assumed. Reference to a table in Attachment 2 was add to the Wheras clause on page 3 of the PA where the adverse effect determinations are noted. The table is a summary of information provided in the FEIS and the Historic Resources Technical Report and Addendum.
12	This comment is incorrect. The Historic Effects Report has been made available to all consulting parties and is still available on the project website (www.honolulutransit.org)
13	The Project's Effects Determination for the historic properties eligibile or included on the NRHP is included as an attachment to the PA.
14	The Makalapa Housing APE was prepared by staff with the qualifications to make the proper determinations of these resources, which was approved by SHPD. As you are aware, the ICRMP is a Navy internal management tool, not a Section 106 document. As indicated in the ICRMP, the Navy has chosen to manage the resources together. On a January 25, 2010, the Navy submitted a letter to the City stating that it did not disagree with the existing determination of eligibility completed as part of the Project, which identifies Makalapa Housing and Little Makalapa Housing as two separate districts eligible for listing in the NRHP. As far as the rationale for the two separate districts, they served different purposes (officers vs. enlisted housing), are physically separated by a major public thoroughfare and are from different eras. The landscape area is a noncontributing element that happens to be in the vicinity and holds no particular historic significance. In the end, the separation of the two districts does not influence the integrity of the historic resources in any way.

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15	12	APE - Attachment to the PA	Location of the Pearl Harbor Station
16	13	Page 22	Indirect and cumulative effects of TOD
17	14	Page 23	Stipulations IX.C, D, and E
18	15	Page 25	Treatment plans if SOI standards cannot be met
19	16	Page 22	Kako`o independence
20	17	Page 1	Non participant consulting parties
21	18	Page 8	Lessons Learned Manual
22	19	Page 10	Limits of Phase 4 consistency
23	20	Page 14	Number of historic context studies

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15	The location of the station does not change the effect on the historic resources. The determination of effect does not change because of the slight adjustment in the station location. In consultation and agreement from the Navy, the station was relocated to reduce effects to the Pearl Harbor NHL historic property as a result of the Section 106 process.
16	Although TOD is not a part of the Project, the City recognizes that there is a connection between TOD and the Project. As discussed during consultation, a provision in the TOD ordinance requires preservation of historic resources. The PA was also recently revised to take specific account of the effect on the Chinatown and Merchant Street districts. The City and FTA do not agree with the comment that the City's ordinance "encourages" demolition of historic resources.
17	The wording for these stipulations was developed by the SHPO and reflected as requested in the interest of moving forward.
18	The Kako`o can be positioned to recognize an inability to meet the standards and call for development of a treatment plan that can include the consulting parties
19	Kako`o is intended to be independent of the City and their employees and contractors. The PA will reflect that commitment. As provided in the PA, the SHPO and FTA will have the opportunity to review the request for proposals, list of final applicants, and review the statement of work for the Kako'o position.
20	All invited consulting parties that did not decline consulting party invitations are listed. This was the preferred approach indicated by ACHP.
21	This provision was requested by the SHPO. As with all other best practices manuals, it is intended to be used to create a body of experience that will help with future projects to take advantage of what worked and improve upon what did not.
22	Phase 4 of the Project extends from Middle Street to Ala Moana. The reference to Waiakamilo is not stated as a limit but a reference to the area of greatest concern about the possible discovery of iwi noted by the OIBC. The statement refers to "the entire Phase 4 area, including Waiakamilo Road to Ala Moana Center."
23	This was discussed during the consultation meetings. It can be as many as 33, but recognizing it most likely will be fewer than that. A reference to a specific number was rejected at that time of this discussion during consultation.

	A	B	C
24	21	Page 15	Number of cultural landscape reports
25	22	Page 6	Navy role
26	23	Page 22	True Kamani trees
27	24	Attachment 1	APE maps do not include the Navy
28	25	Attachment 1	Historic Resource parcel maps panes out of order
29	26	Attachment 1	37 panes mentioned in key, but only 36 included
30	27	Attachment 1	Salt Lake, Airport and Extensions are all shown.
31	28	Attachment 1	Naming of the APE maps
32	29	Attachment 1	APE not delineated on panes 9, 10, 11, 12 an 13a
33	30	Attachment 1	Location of Pearl Harbor Station
34	31	Attachment 1	Two unnumbered maps appear to be of the same location at different scales.
35	32	Attachment 1	Pane 39a show historic resources beyond the Ala Moana terminus of the PA

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24	The number will be determined once the PA is executed and within 90 days through studies and outreach as stipulated in the PA.
25	The latest PA reflects the wording the Navy requested for its role. No evaluation or mitigation of a resource on Navy property will occur without Navy involvement.
26	The new locations of the trees are not yet defined, but will be as the Project details become clearer. Questions such as transplantation, splicing and the use of keiki are beyond the scope of the PA.
27	The SHPO concurred with the APE description on February 4, 2008. The maps were prepared as requrested by the Section 106 consulting parties and were distributed to the Navy for their review.
28	The original maps were numbered beginning with the Salt Lake Alignment. The Airport Alignment section was added at the end of the Salt Lake Alignment. However, when the Airport alternative was identified as the preferred alternative, the maps reflecting the Salt Lake alignment were removed. The revised key map now shows how the parcel map panes were renumbered.
29	The maps have been revised and have been renumbered as requested.
30	The APE maps attached to the PA reflect the APE definition which was concurred by the SHPO. These maps have been revised to show only the Airport alignment. It should be noted that the APE definition is one parcel from the alignment. In some cases, the parcel is very large and the boundary is beyond the scale of the map attached to the PA.
31	No name changes is needed. Only renumbering of maps have been done.
32	See comment # 27.
33	The Pearl Harbor station location shown on the maps was shown originally in the approved APE. This station was moved slightly south of the location in the APE map to reduce effects to the Pearl Harbor NHL historic property as a result of consultation with the Navy.
34	See comment # 27.
35	See comment # 27.

	A	B	C
36	33	Attachment 2	Title block does not show Navy as a signatory
37	34	Attachment 2	Information on Honouliuli Stream is missing

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36	Will correct Attachment 2 as requested.
37	Will include information on this resource if missing.