	A	B	C
1	**ACHP Comments and Responses on the PA**		
2			
3	Number	PA Page Number	Comment
4	1	Page 6	PA should acknowledge independence of the project manager (kako`o)
5	2	Page 7	Other qualified professionals in addition to the project manager
6	3	Page 8	Best Practice Manual
7	4	Page 14	Changing Stipulation IV to state that the project manager determines if the SOI can be applied
8	5	Page 24	Stipulation IX.D, previously unidentified indirect and cumulative effects
9	6	Page 24	Stipulation IX.E.2 City to request documents from any project in a historic district
10	7	Page 39	Expand Appendix A to "consulting parties"
11	8	Page 32	No provision of the PA to be altered except as appropriately provided for in Stipulations XIV.H and XIV.I

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3	Response
4	OK. The language will reflect the independence of the role.
5	The qualified professionals refers to the people tasked with completing the work in the PA who would interact with the kako`o
6	The use of a Best Practice Manual is generally for a common purpose: to take advantage of the experiences in one project to improve performance on the next. In this case, the request for the manual came from the SHPO, but it is assumed to be used for the same purpose.
7	This request is not clear. There is no provision for the project manager to make such determinations. Is the intent to add it?
8	Provisions have been made in keeping with the request from the SHPO.
9	The PA as written reflects the request by the SHPO for protection of the Chinatown and Merchant Street Districts. While those are also covered, the PA was amended to include this specific reference to satisfy the concern about the effect of the Project on those districts. The City's historic districts already provide for this, generically. The Project is an inappropriate vehicle for district protection and management if the effect is not related to the Project.
10	OK. This will be changed.
11	The intent of this is not clear, but the PA already provides for such compliance in the stated stipulations

	A	B	C
12	9		Teleconference on October 2, 2010
13	10	Page 6	Navy role stated in PA
14	11	Attachment 1	New APE maps and listing of adversely affected properties.

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12	Reference to a teleconference that did not include the Lead Agency and the sponsor agency would appear to be outside the bounds of the consultation process as put forth by ACHP. The discussions lacked the benefit of the most knowledgeable participants regarding the Project specifics, yet concluded that a number of items were unsatisfactory. The ACHP's role, in particular, in this discussion is questionable. This has been a difficult process because there is no consideration of the many adjustments made to the PA by FTA and the City to address concerns raised over the course of the consultation process yet there is a forum for further defining additional, already discussed issues to, yet again, further complicate the PA approval process. This is not consistent with the City's or FTA's understanding of the intent of Section 106 or historic preservation. The details and the intent have little to do with preservation and appear aimed at blocking the Project despite major concessions by the FTA and the City along the way.
13	The latest version of the PA includes the wording requested by the Navy to describe their role.
14	This comment is misrepresentative of the process to date. The APE maps are the same that have been used throughout the process. It has always followed parcel lines and was approved that way by the SHPD. Any other depiction would not provide clear indication of the affected properties. Such a comment at this stage of the process is inappropriate. There is a listing of the affected properties, including the nomination materials that are an attachment to the PA and which describe the properties in great detail. The materials will be made available on the project website.

	A	B	C
15	12		Effect of the RTA
16	13		Consulting party teleconference

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15	The RTA will inherit all the responsibilities of the Project, including the PA. The RTA is only a semi-autonomous agency that does not obviate the involvement of the City in the PA process.
16	All consulting party comments have been considered. The comments provided by the parties are nearly all repeated comments previously addressed in meetings, so there is no need for an additional teleconference.