

**HTS Noise**  
**Comment 44, Chapter 4**  
**9/24/09**

We have reviewed the N&V Technical Report HHCTC Project. October 1, 2008. Under Consequences for the Build Alternative (p.5-1) the text states: “the Build Alternative design includes 3-foot-high barriers on the outside edge of the platform and wheel skirts on the LRT (?) vehicles. These design changes in the design were made to avoid noise impacts.”

There is no discussion anywhere in this document of the sound exposure levels (SEL) of the LRT/”rapid rail” alternative. Reference source noise levels are at the heart of any noise analysis. Note that FTA N&V guidance states that “the procedure (noise levels for a general assessment) starts with the prediction of source noise levels (SEL)...” (p.5-4) Basically, there is no way for even an experienced reviewer to determine if the resultant determination of noise impacts is correct because the SEL of the train is not discussed..

Having no clue as to the project SEL, the reviewer is left to determine if the mitigation measures have been used appropriately. FTA N&V guidance allows for a minus five (-5) dBA adjustment for a “noise barrier that blocks the line of sight” (Table 5-2) when calculating general project noise impact for an aerial guideway. It is entirely unclear from the technical report how this calculation was made other than conflating the “wheel skirts” and the “3-foot high barrier” in calculating noise impacts.

FTA N&V guidance does not permit the inclusion of mitigation measures when determining project related noise impacts. Project impacts are determined and presented as “project related noise impacts.” If the general assessment determines that noise impacts will result, those results are presented in the “environmental consequences” section of the technical report and subsequent NEPA document. If a mitigation measure, such as wheel skirts is determined through modeling to reduce project related noise levels to an acceptable level, these conclusions are presented in the “environmental mitigation” sections of the respective documents. The unacceptable conflation of mitigation measures with determining project impacts aside, there is no presentation in the either document of the noise reduction merits of “wheel skirts.” Wheel skirts are an appropriate noise mitigation treatment (Table 6-12) and their use should be thoroughly discussed in the mitigation section of both documents.

We conclude that FTA guidance was not followed in the creation of the N&V Technical Report:

- Mitigation measures were erroneously included in the general noise assessment of project impacts
- Discussion of project mode(s) and appropriate sound emission levels are lacking
- Discussion of noise mitigation measures and their appropriateness under FTA guidance are lacking