HONOLULU HIGH-CAPACITY TRANSIT CORRIDOR PROJECT
Review Comments Form

Submittal/Document Title: Programmatic Agreement	Reviewer: ACHP Staff	Date: 08/12/2009

Response Code: A - Agree and will comply B - Will investigate and comment C - Clarification needed D - Disagree for reasons noted E – No action Needed

Comment No.	Reference	Comment	Responsible Party	Response Code	Response:	Reviewer's Concurrence	Verification of Incorporation
1	Title	Add ACHP to the title block as a signatory to the agreement with FTA and SHPO, to the "now, therefore" clause that closes the preamble, and to the signature page.			Done		
2	Preamble	Identify the City and County of Honolulu as an invited signatory; identify all other signatories and invited signatories according to their role.			Done		
3	Preamble	Note how FTA has addressed its responsibilities under 800.10 of our regulations to notify and invite the Secretary of the Interior (represented by National Park Service region) to consult if FTA has made a finding of adverse effect for one or more National Historic Landmarks.			Done		
4	Stipulations	ACHP recommends clearly defining roles and responsibilities within the PA as the first stipulation. Stipulation VIII could be moved into such a stipulation.			Added Stipulation I and restructure of stipulations		
5	Stipulations	Several stipulations would benefit from greater specificity about timeframes for completion, how scopes of work will be developed and reviewed, what party is assigned responsibility for the task, and/or what products will result. See especially			Schedule added to archeology and to general stipulaitons		

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		Stipulations I, II, III, IV, V and VI.					
6	Stipulations	Stipulations should specify, where appropriate, how and when consultation will take place in the preparation and review of work products.			See Stipulaitn I B		
7	Stipulations	FTA and the City should coordinate with the Hawaii SHPO in making historic property documentation information accessible to the public per Stipulation I, E.			Agree. Stipulaiton makes data available, and agrees to work with any appropriate group to make it available in other format.		
8	Stipulations	What is the value or need addressed by preparing both National Register nominations and HABS/HAER/HALS documentation for certain properties (Stipulations I and V)?			This was the request of consulting parties.		
9	Stipulations	Will any elements of the raised guideways, stations, or support facilities go through a design review process to minimize their visual effect on historic properties? If so, how will consulting parties be offered to opportunity to review and comment on plans?			Yes, as listed in PA stations will each have public design workshop and 106 consulted parties have been added to information distribution for process.		
10	Stipulations	The PA should include a detailed plan for handling post-review discoveries. The language in Stipulation VIII should provide a clear and detailed process for what will take place in the event			See new stipulaition XI.		

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		of a discovery, when and how FTA and the SHPO will be notified, and timeframes for consulting on a treatment plan. What is the relationship of Stipulation X.G. to Stipulation VIII?					
11	Stipulations	The Archaeological Inventory Survey Plan should be developed to the extent possible now and included as an attachment to the PA to provide a clear protocol for how phased identification, evaluation, effects assessment, and treatment planning will take place. Project phasing and how it relates to the schedule for archaeological work should be made clear in the PA.			Plan not attached at request of SHPD.		
12	Stipulations	Stipulation IX should be expanded to include archaeological discoveries as well as unexpected effects to above-ground historic properties. ACHP recommends a detailed discovery provision that provides explicit information about the process of notification of a discovery, evaluation of a newly –discovered historic property, and consultation to develop a treatment plan. The process should include discrete timeframes.			See new Stipulaiton XII		

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13	Stipulations	ACHP recommends the addition of stipulations referencing how FTA will handle any emergency situations that may occur during project construction, how objections raised by a member of the public would be addressed, and what measures the City will take to avoid damage to nearby historic properties in the course of project construction through a construction protection plan or similar plan of action.			Added		
14	Stipulations	Stipulation XI.D should specify a duration for the PA to be implemented.			Added		