



Preserving America's Heritage

April 27, 2016

Ms. Meghan Conklin
Deputy Assistant Secretary
U.S. Department of Energy
Office of Electricity Delivery and Energy Reliability
National Electricity Delivery Division
1000 Independence Ave SW (OE-20)
Washington, DC 20585

Ref: *Proposed ITC Lake Erie Connector Project*
Springfield Township through Conneaut Township, Pennsylvania

Dear Ms. Conklin:

The Advisory Council on Historic Preservation (ACHP) appreciated the opportunity to meet with you and your staff on April 4, 2016, to discuss recent projects from the U.S. Department of Energy (DOE) and its efforts to comply with Section 106 of the National Historic Preservation Act (NHPA; 54 U.S.C. 306108) and its implementing regulations, "Protection of Historic Properties" (36 CFR Part 800). Our conversation regarding early coordination with the ACHP was helpful, and will improve collaboration between our agencies.

On April 13, 2016, we received notification from DOE regarding the proposed ITC Lake Erie Connector Project in Pennsylvania. As the proposed undertaking involves the issuance of a Presidential permit, DOE initiated consultation with the Pennsylvania State Historic Preservation Officer (SHPO) on April 11, 2016, and has begun identifying historic properties within the undertaking's Area of Potential Effects (APE). In its initiation letter, DOE has also requested that the SHPO review a list of potential consulting parties, including federally recognized tribes and local governments, to begin its consultation with those parties in identifying historic properties within the APE. At this time, DOE plans to develop a Programmatic Agreement (PA) in accordance with 36 CFR Section 800.4(b)(2). This PA will incorporate provisions for phased identification and evaluation approach to address the potential adverse effect from the undertaking.

While we greatly appreciate the early notification regarding DOE's undertaking, it would be helpful for us to better understand whether DOE believes the ACHP's participation is needed or if there are procedural or policy questions that we can help DOE address before we determine our participation. As the DOE has just initiated consultation with the SHPO, it may be beneficial for DOE to further consult with the SHPO and begin soliciting the input of other consulting parties to determine what, if any, historic preservation issues may arise as consultation continues. DOE can then provide the ACHP with a summary of the views provided by the consulting parties so that we can better assess the need for our participation to complete consultation.

We look forward to working with DOE on these important projects on your response to these recommendations. Once we receive this additional material we will advise you as to our participation.

ADVISORY COUNCIL ON HISTORIC PRESERVATION

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If you have any questions, please contact Ms. Jaime Loichinger at (202) 517-0219 or via email at jloichinger@achp.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Reid J. Nelson", with a long horizontal flourish extending to the right.

Reid J. Nelson
Director
Office of Federal Agency Programs
Federal Permitting, Licensing and Assistance Section