



Department of Energy
Washington, DC 20585

April 11, 2016

Mr. Doug McLearen
Division Chief – Archaeology and Protection
Pennsylvania Historical and Museum Commission
400 North Street
Commonwealth Keystone Building, 2nd Floor
Harrisburg, PA 17120-0093

SUBJECT: Request to Initiate 106 Consultation under the National Historic Preservation Act for the proposed ITC Lake Erie Connector Project (DOE/EA-412)

Dear Mr. McLearen:

The U.S. Department of Energy (DOE) is in the process of preparing its draft Environmental Assessment (EA) for the proposed ITC Lake Erie Connector (LEC) project in the state of Pennsylvania. DOE is preparing its draft EA pursuant to its obligations under the National Environmental Policy Act (NEPA) to evaluate environmental impacts of providing a Presidential Permit to ITC Lake Erie Connector, LLC (ITC Lake Erie) for the construction, operation, maintenance, and connection of the portion of the transmission line within the United States. The proposed DOE action is the potential grant of a Presidential Permit for the international border crossing requested by ITC Lake Erie as part of its proposal. DOE has determined to treat this action as an undertaking that has potential to cause adverse effects on historic properties per the Advisory Council on Historic Preservation's (ACHP's) National Historic Preservation Act (NHPA) implementing regulations at 36 CFR §800.3(a).

DOE is coordinating its compliance with Section 106 of the NHPA with its review under NEPA according to the process set out in 36 CFR §800.3(b). Per standing policy, DOE will explicitly solicit information from the public regarding cultural and historic resources through its Notice of Availability of its draft EA when published in the Federal Register. Agencies and the public will have 30 days to review and comment on the draft EA. DOE will also make cultural resources reports and information publicly available, as appropriate, on the LEC project EA website at <http://lakeerieconnectorea.com>.

DOE is providing you with a summary of the actions that DOE is taking to comply with Section 106 of the NHPA, including project background, efforts to identify historic properties potentially affected by the proposed LEC project to date, a preliminary list of potentially affected historic properties listed or eligible for listing on the National

Register of Historic Properties (NRHP), and a list of potential Section 106 consulting parties for the proposed LEC project. This letter also discusses DOE's initial proposal for the Area of Potential Effects (APE) to be used in DOE's proposed phased approach to identification and evaluation of historic resources under Section 106. Furthermore, DOE is sending this letter as its official request for initiation of Section 106 consultation under NHPA with the Pennsylvania State Historic Preservation Office (SHPO) located within the Pennsylvania Historical and Museum Commission (PHMC), and would appreciate your written reply within 30-days from the date of this letter or as soon as possible.

Background

On May 29, 2015, ITC Lake Erie applied to DOE for a Presidential Permit ^a for a new approximately 72.4-mile long, high voltage direct current (HVDC) bi-directional transmission line that would cross the international border between the United States and Canada, near Nanticoke, Ontario, and terminate at the proposed new Erie converter station in Springfield Township. The project would then connect to the existing Penelec Erie West Substation in Conneaut Township, Pennsylvania. For purposes of permits being issued in the U.S., the LEC project consists of an approximately 42.5-mile long transmission line with an operating voltage of +/- 320 kilovolts (kV) and an expected power transfer rating of 1000 megawatts (MW). The transmission line would be a bi-directional, High-Voltage Direct Current (HVDC) merchant line that consists of two cables, one positively charged and the other negatively charged.

The proposed LEC project would be constructed in both aquatic (underwater) and terrestrial (underground) environments. From the Canadian border, the proposed transmission line would be located underground in Nanticoke, Ontario and would enter Lake Erie via a horizontal directional drill (HDD). The cables would then be buried in the bed of Lake Erie to a target depth of 3-10 feet. The cables would emerge from Lake Erie in Springfield Township, Pennsylvania, and would be buried primarily along road rights-of-way for approximately 7.1 miles to the proposed Erie Converter Station. From the proposed converter station, the proposed LEC project would involve underground installation of a 345-kV high voltage alternating current (HVAC) transmission system (i.e., two underground HVAC lines) which would run approximately 2,082 feet to the existing Penelec Erie West Substation in Conneaut Township, Pennsylvania (Attachment A).

DOE is the lead federal agency in the preparation of the EA. The U.S. Army Corps of Engineers, Pittsburgh District, (USACE) will be a cooperating agency with DOE in preparing this EA. DOE is also the lead federal agency for purposes of compliance with Section 106, in accordance with 36 CFR § 800.2(a)(2), and will address the potential effects of the NEPA cooperating agency's proposed action on historic and archaeological resources.

^a In accordance with Executive Order (EO) 10485, as amended by EO 12038, and the regulations at 10 Code of Federal Regulations (CFR) 205.320 et seq. (2000), "Application for Presidential Permit Authorizing the Construction, Connection, Operation, and Maintenance of Facilities for Transmission of Electric Energy at International Boundaries."

DOE documented a Notice of Intent (NOI) to prepare an EA in the Federal Register on July 17, 2015, with comments and motions to intervene on or before August 17, 2015. The NOI specifically indicated that cultural and historic resources are being analyzed as part of the federal environmental review. While the proposed action is the potential grant of a Presidential Permit by DOE for the international border crossing, the proposed construction, operation, maintenance, and connection of the portion of the transmission line within the United States is considered a connected action to DOE's proposed action under NEPA. DOE is therefore analyzing the potential environmental effects from the proposed action and the connected action in the EA. For the purposes of compliance with Section 106 of the NHPA, DOE is considering the potential for adverse effects to cultural and historic properties for the proposed border crossing and entire length of the proposed transmission line.

Consulting Parties

In accordance with 36 CFR §800.2, DOE has identified potential consulting parties, including PHMC, SHPO, ITC Lake Erie, local government representatives, applicable Tribal Historic Preservation Officer(s) and other Native American Tribes (Attachment B), state and local historical groups, and county and town historical societies with an interest for the purposes of Section 106 consultation under NHPA. A list of consulting parties identified by DOE is enclosed with this letter for your review and input (Attachment C). DOE requests that you and your staff provide DOE with any other potential Section 106 consulting parties for the LEC project that may not have yet been identified or that should be included in this list of potential consulting parties. Any assistance your office may provide is greatly appreciated.

As proposed, the LEC project does not directly involve tribal reservation lands or require a right-of-way grant or special use grant from tribes.

Identification Efforts to Date

The proposed undertaking has the potential to affect historic properties either listed in, or eligible for, inclusion on the NRHP. Three cultural resources surveys were performed by ITC Lake Erie's consultant, Hartgen Archeological Associates, Inc. as part of the LEC project Presidential permit application. The Phase 1A literature review considered a geographic area within which the project may directly or indirectly cause alterations in the character or use of historic properties, and includes all areas along the proposed transmission line construction corridor where ground-disturbing activities would be conducted. It also included those areas outside the proposed transmission corridor, including the Lake Erie HVDC Converter Station site, laydown areas, access roads, and other locations that may be affected by the project construction and operations.

The studies completed to date include the following.

- Hartgen Archeological Associates, Inc. 2015. PHASE IA Literature Review and Architecture Review and Archeological Sensitivity

Assessment for the Lake Erie Connector Project Townships of Conneaut, Girard, and Springfield, Erie County, Pennsylvania

- Hartgen Archeological Associates, Inc. 2016. Phase IB Archeological Field Reconnaissance - Lake Erie Connector Project, Townships of Conneaut, Girard, and Springfield Erie County, Pennsylvania
- Hartgen Archeological Associates, Inc. 2016. Marine Route Survey Archeological Analysis – U.S. Landfall to Offshore International Border for the Lake Erie Connector Project, United States/Canada Border to Landfall in Erie County, Pennsylvania

With regard to the Lake Erie portion of the proposed LEC project, Hartgen conducted an initial study of the NHRP listed or eligible properties and identified two shipwrecks, *Charles Foster* and the “17 Fathoms Wreck,” within 1 mile of the proposed LEC project route (Table 1). Other unverified wrecks may be present in the vicinity of the proposed project.

Table 1. Known Cultural Resources for the Lake Erie Segment within One Mile of the Proposed LEC project.

Site Type	Site Name and/or State and/or Project Number	Description
Underwater site	<i>Charles Foster</i>	Shipwreck approximately 2,000 feet from proposed route; went down on December 8, 1900
Underwater site	17 Fathoms Wreck	Shipwreck approximately 1,950 feet from proposed route; reported in 1963, depth of 17.5 fathoms (105 feet)

Regarding the overland portion of the LEC project, the Phase 1A study identified 22 known archaeological sites within a mile of the LEC project; five archaeological sites were also located during field investigations. The study area encompassed approximately 1 mile on either side of the centerline of the proposed transmission line and of the site proposed for the converter station.

None of the sites identified have been determined eligible for listing in the NRHP.

Hartgen also investigated historical resources along the overland portion of the LEC project. The Frederick E. Blair House on West Lake Road was determined eligible for listing on the NHRP; the precise location of the property is unknown and is located more than 0.5 mile west of the proposed LEC project route.

The LEC Presidential permit application, including associated maps, drawings, and initial cultural resources study, can also be viewed or downloaded in its entirety from the DOE Office of Electricity Delivery and Energy Reliability (OE) program Web site at:

<http://energy.gov/oe/downloads/application-presidential-permit-oe-docket-no-pp-412-itc-lake-erie-connector-project>

Cultural Resource Studies

At this time, DOE understands that ITC Lake Erie has provided the PHMC with the cultural resource reports for the proposed LEC project.

Scope of Future Identification Efforts under Section 106

In order to begin your consideration of DOE's scope of future identification and evaluation efforts, DOE typically defines an APE for this type of undertaking that includes the geographic area or areas within which the project may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist.

The APE includes all areas along the transmission cable corridor where ground-disturbing activities will be conducted. The APE would also include areas outside the transmission cable corridor, including the converter station site, the HVAC cable alignment, transmission interconnection sites, laydown areas, access roads, and other locations that may be affected by project construction and operations. Additionally, the APE would take into account standing historic properties (i.e., buildings, structures, individual objects, and districts) that may be indirectly affected by the use of heavy equipment, particularly along the overland portion of the project's proposed route.

The width of the construction corridor varies based on installation techniques and environment. The excavation of the cable trench, installation of erosion and sediment control measures, installation of the cables, and stockpiling of excavated materials are expected to occur within 40 to 75 feet of the construction corridor.

DOE looks forward to future discussions with you and other consulting parties about the APE for the LEC project, and understands that no final APE determinations may be made at this time.

Finally, DOE wants to take this opportunity to inform you early on of its intent to develop a PA pursuant to 36 CFR § 800.14(b) to resolve the proposed project's potential effects on historic properties. The PA would be developed in consultation with SHPO, THPO, Consulting Parties, the public, and other interested parties, as appropriate.

The PA would require ITC Lake Erie to develop a Cultural Resources Management Plan (CRMP) for the proposed LEC project in consultation with your office and the Consulting Parties prior to initiation of construction activities.

In closing, DOE currently seeks your concurrence on initiating its Section 106 consultation process for the proposed LEC project. DOE also seeks any information or suggestions that your office may have with regard to potential consulting parties or tribes

that are included in the attached consulting parties list, or any additional information that should be considered at this time.

Please provide your Section 106 initiation concurrence and any material information that you may have in writing so that it may be added to the administrative record to evidence DOE's compliance with Section 106 consultation responsibilities.

At this time, we also wish to clarify the name and contact information for DOE's representative for purposes of consultation pursuant to Section 106. In accordance with 36 CFR Part 800.2(a)(3), the DOE has authorized Kleinschmidt Group to prepare DOE's subject EA, which will include an analysis of the proposed LEC project's potential for adverse effects on cultural resources, including historic properties as defined by Section 106 of the NHPA and its implementing regulations at 36 CFR Part 800. Coordination of consultation activities under the Section 106 process will be completed by Ms. Kelly Schaeffer, Senior Regulatory Advisor at Kleinschmidt Group. Ms. Schaeffer can be contacted at (703) 753-9772 or by e-mail at Kelly.Schaeffer@KleinschmidtGroup.com.

DOE remains legally responsible for findings and determinations and for the DOE's government-to-government relationships with Indian tribes.

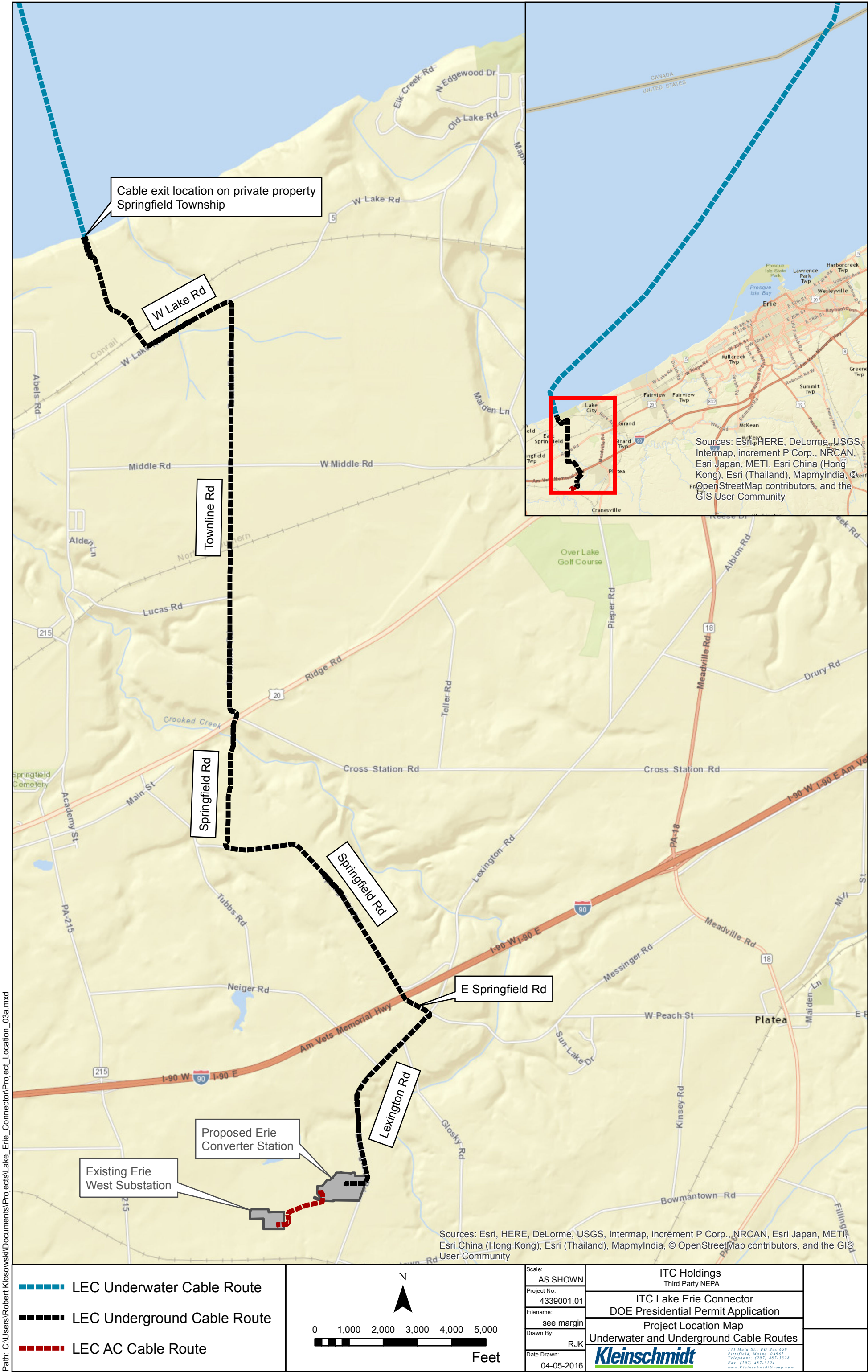
DOE very much looks forward to working with you and your staff in the near future and appreciates your assistance in this effort. If you have any questions or comments regarding the proposed LEC project, please contact me directly at any time at Brian.Mills@hq.doe.gov or (202) 586-8267.

Yours very truly,

A handwritten signature in cursive script, appearing to read "B. Mills".

Brian Mills
National Electricity Delivery Division (OE-20)
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed: Attachment A – Project Location Map
Attachment B – Consulting Native American Tribes
Attachment C – Other Consulting Entities for the Lake Erie Connector Project



Path: C:\Users\Robert Kiosowski\Documents\Projects\Lake_Erie_Connector\Project_Location_03a.mxd

TRIBAL CONTACTS (AS OF March 25, 2016)

(*check www.pennndotcrm.org for most up-to-date tribal contact list)

Absentee-Shawnee Tribe of Oklahoma

Govt-Govt (cc. for Section 106 and projects):

Edwina Butler-Wolfe, Governor
Absentee-Shawnee Tribe of Oklahoma
2025 S. Gordon Cooper Drive
Shawnee, OK 74801
Phone: (405) 275-4030
Fax: (405) 878-4533

Section 106/environment/NEPA:

Joseph Blanchard
Same address
Phone: (405) 275-4030 ext. 303
Fax: (405) 878-4533
Email: joseph.blanchard@astribe.com

and

Carol Butler
Same Address
Phone: (405) 275-4030 ext 302
Fax: (405) 878-4533
Email: cabutler@astribe.com

Cc: Governor

Cayuga Nation

Govt-Govt:

Chief Clint Halftown
P.O. Box 803
Seneca Falls, NY 13148
Phone: (716) 998-1054
Fax: (315) 568-0752
Email: To be Determined

Section 106 and projects/Environment/NEPA:

Timothy Two Guns
Same address

Delaware Nation

Govt-Govt:

Kerry Holton, Tribal President
Delaware Nation
P. O. Box 825
Anadarko, OK 73005
Phone: (405) 247-2448
Fax: (405) 247-9393

Section 106 and projects:

Jason Ross
Delaware Nation
31064 State Highway 281
Anadarko, OK 73005
Phone: (405) 247-8903
Fax: (405) 247-8905
Email: jross@delawarenation.com

Environment/NEPA:

Darrin Ahshapanek, EPA Director
Same address

Delaware Tribe of Indians

Govt-Govt:

Chet Brooks, Chief
170 N Barbara Ave
Bartlesville, OK 74003
Phone: (918) 336-5272
Fax: (918) 336-5513
cbrooks@delawaretribe.org

Section 106 and projects:

Dr. Brice Obermeyer
1200 Commercial Street
Roosevelt Hall, RM 212
Emporia State University
Emporia, KS 66801
Phone: (620) 341-6699
Fax: N/A
Email: bobermeyer@delawaretribe.org

For previous Projects with ongoing consultation
For new Project Notifications Send to:
Susan Bachor
Delaware Tribe Historic Preservation Representatives
P.O. Box 64
Pocono Lake, PA 18347
Phone: 610-761-7452
Email: temple@delawaretribe.org

Blair Fink
Delaware Tribe Historic Preservation Representatives
Temple University
1115 West Polett Walk
Philadelphia, PA 19122
Phone: N/A
Email: temple@delawaretribe.org

Eastern Shawnee Tribe of Oklahoma
Govt-Govt:
Glenna Wallace, Chief
Eastern Shawnee Tribe of Oklahoma
P. O. Box 350
Seneca, MO 64865
Phone: (918) 666-2435
Fax: (918) 666-2186
Email: gjwallace@estoo.net

Section 106 and projects:
Robin Dushane Cultural Preservation Officer
Same address
rdushane@estoo.net

Environment/NEPA:
Roxane Weldon, EPA Director
Same address

Oneida Indian Nation
Govt-Govt:
Raymond Halbritter, Nation Representative
Oneida Indian Nation
5218 Patrick Road

Verona, NY 13478

Section 106 and projects:
Jesse Bergevin, Historian
Oneida Indian Nation
1256 Union Street
PO Box 662
Oneida, NY 13421-0662
Phone: (315) 829-8463
Fax: (315) 829-8473
jbergevin@oneida-nation.org

Cc: Laura Misita, Land Administrator
Oneida Indian Nation
5218 Patrick Road
Verona, NY 13478
Phone: (315) 361-8188
Fax: (315) 361-8209
Email: lmisita@oneida-nation.org

Environment/NEPA and legal issues:
Stephen J. Selden, Esq.
General Council
5218 Patrick Road
Verona, NY 13478
Phone: (315) 361-8687
Fax: (315) 361-8621

Oneida Nation of Wisconsin
Govt to Govt:
Cristina Danforth, Chairwoman
Oneida Nation of Wisconsin
P. O. Box 365
Oneida, WI 54155-0365
Phone: (920) 490-2096
Fax: (920) 490-2099

Section 106 and projects,
Environment/NEPA:
Corina Williams, THPO
Oneida Nation of Wisconsin
Same address
Phone: (920) 496-5386
Fax: (920) 490-2099
E-mail: cwilliam@oneidanation.org

Onondaga Nation

Govt-Govt, Section 106 and projects,

Environment/NEPA:

Tony Gonyea, Faithkeeper

Onondaga Nation

RR#1 Box 245

Onondaga Nation

via Nedrow, NY 13120

Phone: (315) 952-3109

Fax: (315) 469-1725

E-mail: ononationhispres@aol.com

Seneca Nation of Indians

Govt to Govt:

Maurice A John Sr., President

Seneca Nation of Indians

P.O. Box 231

Salamanca, NY 14779

Section 106 and projects,

Environment/NEPA:

Scott Abrams, Acting THPO

Seneca Nation of Indians

Tribal Historic Preservation Office

90 O:hi'yoh Way

Salamanca, NY 14779

Phone: (716) 945-1790 ext 3580

Fax: (716) 945-0351

E-Mail: scott.abrams@sni.org

Seneca-Cayuga Tribe of Oklahoma

Govt-Govt

William L. Fisher, Chief

Seneca-Cayuga Tribe of Oklahoma

23701 S. 655 Road

Grove, OK 74344

Phone: (918) 542-6609 Ext. 14

Fax: (918) 542-3684

Section 106 and projects:

Paul Barton, Historic Preservation Officer

23701 S. 655 Road

Grove, OK 74344

Phone: (918) 787-7979

Fax: (918) 787-9440

Email: pbarton@sctribe.com

Environment/NEPA:

Paul Barton, Environmental Director

Same address

St. Regis Mohawk Tribe

Govt-Govt:

Chief Beverly Cook

St. Regis Mohawk Tribe

412 State Route 37

Hogansburg, NY 13655

Phone: (518) 358-2272

Fax: (518) 358-2272

Section 106 and projects:

Arnold Printup, Historic Preservation

Officer

Same address

Phone: (518) 358-2272

Fax: (518) 358-4302

Email: arnold.printup@srmt-nsn.gov

Environment/NEPA:

Ken Jocks, Director

Environmental Division

RR #1, Box 8a

Hogansburg, NY 13655

Email: ken.jock@srmt-nsn.gov

Shawnee Tribe

Govt-Govt (cc. for Section 106 and projects):

Ron Sparkman, Chairman

Shawnee Tribe

29 South 69a Highway

Miami OK 74354

Phone: (918) 542-7774

Fax: (918) 542-2922

Email: ronded@gmail.com

Section 106 and projects,

Environment/NEPA:

Kim Jumper, Tribal Historic Preservation Officer

Same address

Phone: (918) 542-2441
Fax: (918) 542-9915
Email: kim.jumper@shawnee-tribe.com

cc. Tribal Chairman

**Stockbridge-Munsee Band of the
Mohican Nation of Wisconsin**

Govt-Govt:

Wally Miller, Tribal President
Stockbridge-Munsee Band of the
Mohican Nation, Wisconsin
Route 1
P.O. Box 70
Bowler, WI 54416
Phone: (715) 793-4111
Fax: (715) 793-1307
Email: wally.miller@mohican-nsn.gov

Section 106 and projects:

Sherry White, THPO
W13447 Camp 14 Road
Bowler, WI 54416
Phone: (715) 793-3970
Fax: (715) 793-4836
Email: sherry.white@mohican-nsn.gov

Environment/NEPA:

Greg Bunker
Same address
Phone: (715) 793-4363
Fax: (715) 793-4370

Tonawanda Seneca Nation

Govt-Govt, Section 106, and

Environmental:

Chief Darwin Hill
Tonawanda Seneca Nation
7027 Meadville Road
Basom, NY 14013
Phone: (716) 542-4244 or (716) 542-2341
Fax: (716) 542-4008
E-mail: tonseneca@aol.com

Tuscarora Nation

Govt-Govt, Section 106, and projects:*

Leo Henry, Chief
2006 Mt. Hope Road
Tuscarora Nation
Via Lewiston, NY 14092
Phone: (716) 601-4737
Fax: (880) xxx-xxxx 800-9787

cc. Section 106 and projects:*

Bryan Printup
5226 Walmore Road
Lewiston, NY 14092
Phone: (716) 264-6011
bprintup@helf.org

*As requested by Chief Henry, please
address any correspondence to an
individual to the:

Tuscarora Nation
Chiefs Council

Environment/NEPA:

Tuscarora Environmental Program
Neil Patterson, Jr., Director
2045 Upper Mountain Road
Tuscarora Nation
Sanborn, NY 14132
Phone: (716) 609-3810
Email: npatterson@hetf.org

Lake Erie Connector Project
Section 106 Historic Preservation Consultation List
March 28, 2016

1.0 Federally Recognized Tribes

See attached PDF

2.0 State Historical Groups

Historical Society of Pennsylvania
1300 Locust Street
Philadelphia, PA 19107

3.0 Lake Erie Historical Groups

Lake Erie Islands Historical Society
441 Catawba Ave
Put In Bay, OH 43456

Erie Maritime Museum
150 East Front Street
Erie, PA 16507

4.0 Lake Erie Ferry Service

Miller Boat Line
5174 E Water Street
Port Clinton, OH 43452

5.0 Lake Erie Segment - Counties and Towns in the Project Area

Historical Society of Erie County
356 West 6th Street
Erie, PA 165016

6.0 Overland Segment – Girard Township, Springfield Township, Conneaut Township, and Erie County, PA

Historical Society of Erie County
356 West 6th Street
Erie, PA 16501

Girard Historical Society
1011 N. State Street
Girard, OH 44420

Harborcreek Historical Society
5451 Merwin Lane
Erie, PA 16510

Springfield Township Historical Society
PO Box 564
Flourtown, PA 19031

Conneaut Area Historical Society
501 Sandusky St
Conneaut, OH 44030

Conneaut Historical Railroad Society
363 Depot Street
Conneaut, OH 44030