12 May 2016

Brian Mills
Office of Electricity Delivery and Energy Reliability
U.S. Department of Energy
Washington DC 20585

RE: ER 2014-0106-049-E, DOE: ITC Lake Erie Connecter Project, Request to Initiate Consultation, Girard, Springfield, and Conneaut Township, Erie County

Dear Mr. Mills,

Thank you for submitting information concerning the above referenced project. The Pennsylvania State Historic Preservation Office (PA SHPO) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. These laws include consideration of the project's potential effects on both historic and archaeological resources.

We offer the following comments on the initiation package provided to our office:

We are in agreement with the list of potential consulting parties and tribes provided and request notification of the following additional potential consulting parties:

Preservation Erie 10 East Fifth Street Box 3 Erie PA 16507

Regional Science Consortium and PASST Attn: Jeanette Schnars 301 Peninsula Drive #1 Erie PA 16505

The Area of Potential Effect (APE) is defined in the regulations implementing the Section 106 review process as "The geographic areas or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties." [36 CFR Part 800.16(d)]. Therefore, the APE should take into account those areas from which the project may have indirect (visual) effects as well as direct effects.

We agree with the proposed phased approach to the identification and evaluation of historic resources.

If you need further information regarding archaeological resources, please contact Kira Heinrich at kiheinrich@pa.gov or at (717) 705-0700. If you need further information concerning above ground resources, please contact Barbara Frederick at bafrederic@pa.gov or at (717) 772-0921.

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Sincerely,

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Douglas C. McLearen, Chief Division of Archaeology & Protection