



Preserving America's Heritage

March 4, 2015

Received on November 17, 2015

Mr. Brian Mills
Senior Planning Advisor
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 New England Clean Power Link Project
State of Vermont*

Dear Mr. Mills:

On February 12, 2015, the Advisory Council on Historic Preservation (ACHP) received notice from the U.S. Department of Energy (DOE) that it intends to develop a Programmatic Agreement (PA) pursuant to the National Historic Preservation Act and its implementing regulations, "Protection of Historic Properties" (36 CFR Part 800) for the New England Clean Power Link (NECPL) project. As we understand, the project consists of the issuance of a Presidential permit to TDI-New England (applicant) for the construction, operation, maintenance and connection of approximately 154 miles of underground and underwater transmission lines. DOE has sent this early notice to the ACHP to ensure that we are aware of the project and its intent to develop a PA to address potential adverse effects.

Prior to determining whether the ACHP will participate in consultation to develop a PA for this project, it would be helpful to understand what consultation has been conducted to date with the Vermont State Historic Preservation Officer (SHPO), Indian tribes, and other consulting parties. We understand that DOE intends to use its public participation process under the National Environmental Policy Act (NEPA) to obtain the public's views. This additional information will allow the ACHP to determine if Appendix A of our regulations, Criteria for Council Involvement in Reviewing Individual Section 106 Cases, applies to this undertaking

We would like to suggest that DOE review the handbook the ACHP jointly published with the Council on Environmental Quality (CEQ) in March 2013 on coordinating NEPA and NHPA. DOE should consider using the roadmap for coordination contained in the handbook to ensure that both review processes are aligned.

ADVISORY COUNCIL ON HISTORIC PRESERVATION

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We look forward to receiving DOE's response. If you have any questions about our comments, please contact Ms. Jaime Loichinger at (202) 517-0219 or via email at jloichinger@achp.gov.

Sincerely,

A handwritten signature in cursive script that reads "Charlene Dwin Vaughn". The signature is written in dark ink and is positioned above the printed name and title.

Charlene Dwin Vaughn, AICP
Assistant Director
Office of Federal Agency Programs
Federal Permitting, Licensing and Assistance Section