



## Appalachian Mountain Club

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Brian Mills  
Office of Electricity Delivery and Energy Reliability (OE-20)  
U.S. Department of Energy  
1000 Independence Avenue, S.W.  
Washington, D.C. 20585

Re: Northern Pass Transmission LLC, Presidential Permit Application, OE Docket No. PP-371  
**AMC request to become a “consulting party” for the Section 106 process**

Date: April 8<sup>th</sup>, 2013

Dear Mr. Mills:

The Appalachian Mountain Club (AMC) requests to become a “consulting party” for the purposes of the Section 106 review under 36 CFR 800.2(c)(5).

Since its founding in 1876, the AMC has been a steward of iconic natural and recreational resources in New Hampshire. These resources include the White Mountain National Forest which we helped to inspire through our advocacy for the 1911 Weeks Act, and its system of remote high elevation huts (which we operate under a federal permit with the WMNF), backcountry shelters and campsites (also a permit relationship with the WMNF), and more than 350 miles of trail, including Northern Pass impacted sections of the Appalachian National Scenic Trail (AT), that we maintain as a cooperating partner. Hundreds of thousands of hikers and backcountry enthusiasts use these facilities annually, including more than 45,000 staying in the huts alone. There is a rich cultural background and history behind the identification and protection of these resources that AMC has been a part of for more than a century. On a practical level, we provide professional, paid crews as well as volunteer stewards to protect and maintain these resources, investing significant financial as well as human capital annually to ensure we fulfill our mission to “promote the protection, enjoyment, and understanding of the mountains, forests, waters, and trails of the Appalachian region.”

When hiking the Appalachian National Scenic Trail through the WMNF, AMC’s visual impact modeling of the identified Northern Pass route found multiple viewpoints and crossings along the AT from which the transmission structures would be highly visible. The Appalachian National Scenic Trail has been determined to be eligible for the National Historic Register. As a cooperating maintainer of the AT, and given our involvement with other potential Northern Pass impacted historic features, we hereby request consulting party status. AMC can provide substantive assistance in identifying and reviewing potentially impacted historic resources.

We believe AMC meets the regulatory requirements for becoming a consulting party of a demonstrated interest and a legal and economic relationship with potentially impacted resources. We also reserve the right to object to any Section 106 determinations already made.



## Appalachian Mountain Club

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Thank you for your consideration.

Sincerely,

Susan Arnold  
Vice President for Conservation

Cc: Elizabeth Muzzy, Director, NH Division of Historical Resources  
State Historic Preservation Officer  
Richard Boisvert, State Archeologist  
Deputy State Historic Preservation Officer