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November 13, 2025

Chief of Case Administration
Office of Chief Counsel
Surface Transportation Board
395 E Street, SW
Washington, DC 20024

Re: Central Railroad Company of Indianapolis – Abandonment Exemption –
in Howard County, Indiana
Surface Transportation Board Docket No. AB 511 (Sub No. 8X)

Environmental and Historical Report

Dear Chief of Case Administration:

On or after December 3, 2025, Central Railroad Company of Indianapolis ("CERA") expects to file with the Board a notice of exemption to abandon two lines of railroad of approximately 1.77-miles in the City of Kokomo, Howard County, IN (the "Subject Line"). The "Subject Line" includes, the "Tipton Industrial Lead" extending from approximately milepost 54.3 to milepost 55.6; and a segment of the Marion Subdivision extending from approximately milepost 180.87 to milepost 181.26.

Enclosed is an Environmental and Historic Report that has been served on the relevant consulted environmental agencies and the Indiana State Historic Preservation Office.

If you have any questions about this filing, please contact me.

Sincerely,



Justin J. Marks
Counsel to Central Railroad Company of
Indianapolis

Enclosure

Before the
SURFACE TRANSPORTATION BOARD

STB Docket No. AB 511 (Sub-No. 8X)

CENTRAL RAILROAD COMPANY OF INDIANAPOLIS
- ABANDONMENT EXEMPTION –
IN HOWARD COUNTY, IN

ENVIRONMENTAL/HISTORIC REPORT

(color copies included)

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*Counsel for Central Railroad Company of
Indianapolis*

Dated: November 13, 2025

Before the
SURFACE TRANSPORTATION BOARD

STB Docket No. AB 511 (Sub-No. 8X)

CENTRAL RAILROAD COMPANY OF INDIANAPOLIS
- ABANDONMENT EXEMPTION –
IN HOWARD COUNTY, IN

ENVIRONMENTAL/HISTORIC REPORT

Central Railroad Company of Indianapolis (“CERA” or “Applicant”) will be seeking exemption authority for Applicant to abandon two lines of railroad of approximately 1.77-miles of rail line in the City of Kokomo, Howard County, IN (the “Subject Line”). The “Subject Line” includes, the “Tipton Industrial Lead” extending from approximately milepost 54.3 to milepost 55.6; and a segment of the Marion Subdivision extending from approximately milepost 180.87 to milepost 181.26.¹ It is CERA’s understanding that the City of Kokomo is interested in converting the Subject Line into a trail.

The Subject Line traverses through United States Postal Service ZIP Code 46903. A map of the Subject Line is attached as Exhibit A.

Applicant intends to seek Surface Transportation Board (“STB” or the “Board”) authorization for the abandonment through a class exemption pursuant to the provisions of 49 CFR §1152.50 to enable CERA to abandon the Subject Line, on or after November 3, 2025. This Report is being filed in connection therewith, and in accordance with the requirements of 49 CFR

¹ The initial consultation letter transmitted to the environmental agencies and the SHPO identified the endpoint of this segment of the Subject Line to be 180.82. Upon further review, CERA decided to abandon a smaller segment of track (0.05 miles less) than it had previously stated in the consultation letters.

§§1105.7 and 1105.8. To prepare this Report, Applicant consulted with various state and federal agencies as required by the Board's regulations. See the letter attached as Exhibit B dated September 10, 2025. Based on the written responses received by Applicant to-date attached as Exhibit C, Applicant states as follows:

ENVIRONMENTAL REPORT

(49 CFR 1105.7)

1. PROPOSED ACTION AND ALTERNATIVES

CERA is a Class III railroad. The Subject Line is located in Howard, County, Indiana. CERA acquired the Subject Line in 2002.² Genesee & Wyoming Inc. acquired control of CERA in 2012.³ No local service has been provided on the Subject Line since 2015 and there is no overhead traffic. The Tipton Industrial Lead segment of the Subject Line connects to a segment of rail line that is currently under a trail use agreement.⁴ The Marion Subdivision segment of the Subject Line is stub ended. Following the filing for abandonment, the City of Kokomo intends to acquire the Subject Line for trail use.

2. EFFECTS ON THE TRANSPORTATION SYSTEM

The abandonment will have no effect on the transportation system because there is no overhead traffic over the Subject Line and the last date of local service to or from the Subject Line was approximately ten years ago. As such, no traffic will be diverted. CERA sent consultation letters regarding the proposed abandonment to the Indiana Department of Transportation

² *Central Railroad Company of Indianapolis – Acquisition and Operation Exemption – Norfolk Southern Railway Company*, STB Finance Docket No. 34221 (served July 8, 2002).

³ *Genesee & Wyoming Inc. – Control Exemption – RailAmerica, Inc. et al.* STB Finance Docket 35654 (served Dec. 20, 2012).

⁴ *Central Railroad Company of Indianapolis – Abandonment Exemption – Howard County, IN*, STB Docket No. AB-511 (Sub-No. 6X)(Notice of trail use agreement provided to the Board via a letter from the City of Kokomo and Central Railroad Company of Indianapolis on Oct. 15, 2014).

(“INDOT”). *See* the letter attached as part of Exhibit B. INDOT, Environmental Services responded that INDOT Environmental Services “has no comment regarding the abandonment”. *See* Exhibit C.

3. **LAND USE**

(i) Applicant is unaware of any regional or local land use patterns with which the proposed abandonment would be inconsistent. Applicant consulted with the following agencies regarding the proposed abandonment that may be concerned with land use issues: US Department of Agriculture Natural Resources Conservation Service – Local (“NRCS Local”), US Department of Agriculture Natural Resources Conservation Service – National (“NRCS National”), Environmental Protection Agency Region 5 (“EPA Region 5”), U.S. Army Corps of Engineers Great Lakes and Ohio River Division, , Regulatory Branch (“ACE”), National Park Service (“NPS”), National Park Service Midwest Region (“NPS Local”), U.S. Fish & Wildlife Service – Midwest Region (“FWS”), National Geodetic Survey, National Oceanic and Atmospheric Administration (“NGS”), Indiana Department of Natural Resources (“DNR”), Indiana Game Commission (“IGC”), Indiana Department of Environmental Management and its Office of Air Quality (“INDEM”), Mayor Tyler O. Moore, City of Kokomo and Daryl Maple, President, Howard County Council.

Copies of these letters are attached as part of Exhibit B. To date, Applicant received a reply NGS indicating that the abandonment will have no impact on any geodetic survey marks. A copy of the NGS reply is included as part of Exhibit C.

(ii) Applicant does not believe that the proposed abandonment will have any adverse effect on any prime agricultural land. Consultation notices were sent to the potentially

concerned agencies listed in paragraph 3(i) above, and as indicated, NGS stated that the abandonment will have no impact on any geodetic survey marks.

(iii) Although Howard County does not fall within the Indiana coastal zone, CERA submitted a consultation letter to the Indiana Coastal Resources Management Program to confirm this fact. To date, CERA has not received a response. *See Exhibit B.*

(iv) Applicant believes that the right of way may be suitable for public purposes. It is CERA's understanding that the City of Kokomo is interested in converting the Subject Line into a trail.

4. **ENERGY**

The Subject Line has no local customers and has no overhead service. As such,

(i) the proposed abandonment will have no effect on the transportation of energy sources;

(ii) the proposed abandonment will have no effect on recyclable commodities;

(iii) the proposed abandonment will have no effect on overall energy efficiency;

and

(iv) the proposed abandonment will not divert any traffic from rail to motor carriage.

The effects of the proposed abandonment will not exceed the thresholds set forth in 49 CFR 1105.7(e)(4)(iv).

5. **AIR**

The proposed abandonment will not result in any increases in rail or truck traffic or rail yard activity. The effects of the proposed abandonment will not exceed the thresholds set forth in 49 CFR 1105.7(e)(5).

6. **NOISE**

Applicant does not believe that the proposed abandonment will result in any increase in noise levels.

7. **SAFETY**

Applicant does not believe that the proposed abandonment will have any adverse effect on public health or safety.

8. **BIOLOGICAL RESOURCES**

(i) Applicant has consulted with the FWS, as well as to the following agencies that are potentially concerned with biological resources: DNR, IGC, INDEM, NPS, NPS Local, ACE, NRCS National, and NRCS Local. Copies of these consultation letters are attached as part of Exhibit B. To date, none of these agencies has provided a comment.

(ii) Applicant does not believe that there are any wildlife sanctuaries or refuges, National or State parks or forests in the vicinity of the proposed abandonment. Consultation letters were sent to the agencies identified in the paragraph 8(i) and Applicant has not received any responses.

9. **WATER**

(i) The proposed abandonment and any salvage will be handled in a manner that is consistent with the applicable local, State and Federal water quality standards. Applicant consulted with the agencies identified in paragraph 8(i) none have provided any comment.

(ii) Applicant sent a consultation letter regarding the proposed abandonment to ACE. A copy of this letter is attached as part of Exhibit B. To date, Applicants has not received a response.

(iii) Applicant does not believe that any Clean Water Act permits will be required. Consultation letters were sent to DNR, INDEM and EPA. Copies of these letters are attached as part of Exhibit B. To date, Applicant has not received a response from any of these agencies.

10. PROPOSED MITIGATION

Since no adverse environmental impacts are expected, no mitigation is proposed.

11. ADDITIONAL INFORMATION FOR RAIL CONSTRUCTION

Not applicable.

12. CONSULTATION

As shown by the copies of letters attached as Exhibit B, Applicant has consulted with the following agencies: INDOT, NRCS Local, NRCS National, EPA Region 5, ACE, NPS, NPS, Local, FWS, NGS, IGC, INDEM, DNR, Indiana Coastal Resources Management Program, Kokomo Mayor Tyler Moore, and Howard County Counselor, Daryl Maple.

13. CERTIFICATIONS

Applicant certifies that:

- (a) It consulted with the agencies listed in 49 CFR 1105.7, as described in paragraph 12 above.
- (b) On this date, it sent copies of this report to each of the agencies consulted as shown on the attached certificate of service.
- (c) Notice of the proposed abandonment was published in the *Times of Northwest Indiana* on October 1, 2025. A copy of the form of notice and the proof of publication are attached as Exhibit D.

- (d) Applicant will not file its notice of exemption for the abandonment until twenty (20) days after the consulted agencies have been served with a copy of this report.

HISTORIC REPORT (49 CFR 1105.8)

1. U.S.G.S TOPOGRAPHIC MAP

U.S.G.S. topographic maps showing the location of the proposed abandonment are attached as Exhibit E.

2. DESCRIPTION OF RIGHT OF WAY

Applicant intends to seek STB authorization to abandon approximately 1.77-miles of rail line in the City of Kokomo, Howard County, IN (the “Subject Line”). The “Subject Line” includes, the “Tipton Industrial Lead” extending from approximately milepost 54.3 to milepost 55.6; and a segment of the Marion Subdivision extending from approximately milepost 180.87 to milepost 181.26.⁵ It is CERA’s understanding that the City of Kokomo is interested in converting the Subject Line into a trail.

The Subject Line is located in an urban area with mixed use developments comprised of commercial and residential uses. The right of way is of varying widths and is crossed by fifteen public roadways.

3. PHOTOGRAPHS OF HISTORIC STRUCTURE(S)

No structures 50 years old or older (historic) exist on the Subject Line.

4. DATES OF CONSTRUCTION OF HISTORIC STRUCTURE(S)

CERA has no documents that pertain to any structures on the Subject Line which are over 50 years old.

⁵ The initial consultation letter transmitted to the environmental agencies and the SHPO identified the endpoint of this segment of the Subject Line to be 180.82. Upon further review, CERA decided to abandon a smaller segment of track (0.05 miles less) than it had previously stated in the consultation letters.

5. HISTORY OF CARRIER OPERATIONS IN THE AREA

CERA is a Class III railroad. The Subject Line is located in Howard, County, Indiana. CERA acquired the Subject Line in 2002.⁶ Genesee & Wyoming Inc. acquired control of CERA in 2012.⁷ No local service has been provided on the Subject Line since 2015 and there is no overhead traffic. The Tipton Industrial Lead segment of the Subject Line connects to a segment of rail line that is currently under a trail use agreement.⁸ The Marion Subdivision segment of the Subject Line is stub ended.

6. SUMMARY OF STRUCTURE DOCUMENTATION

CERA has no documentation pertaining to any structures over 50 years old.

7. OPINION REGARDING CRITERIA FOR LISTING

Applicant provided notice of the proposed abandonment to the Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology (“SHPO”) via letter dated September 8, 2025. On September 16, the SHPO responded that CERA’s intention to abandon the Subject Line may affect an identified historic property. Further, the SHPO states that the Subject Line – if older than 50 years old – would need to be recorded as an archaeological site. The SHPO further outlined steps and information it requires as part of its evaluation of the abandonment and the SHPO asked a few clarifying questions. CERA responded to the SHPO on November 5, 2025. Correspondence with the SHPO is included as part of Exhibit F.

⁶ *Central Railroad Company of Indianapolis – Acquisition and Operation Exemption – Norfolk Southern Railway Company*, STB Finance Docket No. 34221 (served July 8, 2002).

⁷ *Genesee & Wyoming Inc. – Control Exemption – RailAmerica, Inc. et al.* STB Finance Docket 35654 (served Dec. 20, 2012).

⁸ *Central Railroad Company of Indianapolis – Abandonment Exemption – Howard County, IN*, STB Docket No. AB-511 (Sub-No. 6X)(Notice of trail use agreement provided to the Board via a letter from the City of Kokomo and Central Railroad Company of Indianapolis on Oct. 15, 2014).

8. **ENVIRONMENTAL CONDITIONS**

In consideration of the SHPO's concerns over the potential impact of the CERA abandonment, CERA will continue to consult with the SHPO. At this time, CERA has no opinion on the question of impacts on historic resources but notes that the historic property identified by the SHPO is outside of the right-of-way and the Board's jurisdiction.

Respectfully submitted,



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Two Commerce Square
2001 Market St.
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Philadelphia, PA 19103
(215) 640-8523
ehocky@clarkhill.com

*Counsel for Central Railroad Company of
Indianapolis*

Dated: November 13, 2025

ENVIRONMENTAL/HISTORIC REPORT

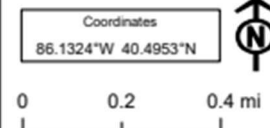
EXHIBIT A

MAP



Lines to be abandoned shown in Red
 CERA's Marion Subdivision shown in Blue
 WSRY Rail Line leased to TPWR shown in Green

Created: 8/27/2025



ENVIRONMENTAL/HISTORIC REPORT

EXHIBIT B

CERA CORRESPONDENCE WITH ENVIRONMENTAL AGENCIES



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Washington, DC 20004
T (202) 772-0909
F (202) 772-0919

September 10, 2025

VIA EMAIL AND/OR FIRST-CLASS MAIL

ALL AGENCIES ON THE
ATTACHED SERVICE LIST

Re: Central Railroad Company of Indianapolis – Abandonment Exemption –
in Howard County, Indiana
Surface Transportation Board Docket No. AB 511 (Sub. No. 8X)

To Whom it May Concern:

This letter is to advise you that Central Railroad Company of Indianapolis ("CERA") intends to file a notice of exemption for CERA to abandon two lines of railroad together referred to herein as the "Subject Line." CERA will abandon 1.38 miles of the Tipton Industrial Lead extending from approximately milepost 54.3 to milepost 55.6; and 0.44 miles of the Marion Subdivision extending from approximately milepost 180.82 to milepost 181.26. The Subject Line is located in Kokomo, Howard County, Indiana and traverses through United State Postal Zip Code 46903. A map of the Subject Line is enclosed hereto.

CERA intends to file with the Surface Transportation Board ("STB") a notice of exemption pursuant to the provisions of 49 CFR § 1152.50 to enable CERA to abandon the Subject Line, on or after November 3, 2025, in STB Docket No. AB 511 (Sub. No. 8X).

CERA understands that the City of Kokomo is interested in converting the Subject Line into a trail.

Based upon information in CERA's possession, the Subject Line does not contain federally granted rights of way.

In advance of preparing an environmental report as required by applicable STB regulations, CERA is consulting with appropriate agencies such as yours as to any concerns which they may have as to the environmental effects of the proposed abandonment.

We would appreciate an expression from you by October 10, 2025, that, within the area of your authority, you do not perceive that the abandonment will have a significant effect upon the environment (or expressing any concerns that you have). If you have any questions about the railroad's proposal or if you need assistance in this matter, please call me at (202) 772-0916.

Thank you for your cooperation.

September 10, 2025
Page 2

Sincerely,

A handwritten signature in blue ink that reads "Justin J. Marks". The signature is fluid and cursive, with the first name "Justin" and last name "Marks" clearly legible.

Justin J. Marks
Counsel to Central Railroad Company of
Indianapolis

Enclosure



Lines to be abandoned shown in Red
CERA's Marion Subdivision shown in Blue
WSRY Rail Line leased to TPWR shown in Green

Created: 8/27/2025

Coordinates
86.1324°W 40.4953°N



0 0.2 0.4 mi

AGENCY SERVICE LIST

Laura Hilden, Director-Environmental Services Indiana Department of Transportation 100 N. Senate Ave. IGCN 758-ES Indianapolis, IN 46204 lhilden@indot.in.gov	National Park Service Midwest Region Interior Regions 3, 4, 5 601 Riverfront Drive Omaha, NE 68102
Indiana Department of Environmental Management 100 N Senate Ave, Indianapolis, IN 46204 info@idem.IN.gov	National Park Service 1849 C Street, NW Washington, DC 20240 info@nps.gov
Indiana Coastal Resources Management Program Indiana Department of Natural Resources (DNR) 402 W. Washington Street, Room W264 Indianapolis, IN 46204. JeOrsburn@dnr.IN.gov - Jenny Orsburn, Program Manager	Indiana Game Commission 101 W. Washington Street East Tower, Suite 1600 Indianapolis, IN 46204 CSCinquiry@dnr.IN.gov
U.S. Army Corps of Engineers Regulatory Branch 231 LaSalle Street Suite 1500 Chicago, IL 60604 lrcregweb@usace.army.mil	Natural Resources Conservation Service USDA Office of the Chief 1400 Independence Ave., SW Room 5105-A Washington, DC 20250 SM.FPAC.NRCS.CLIMATE@usda.gov
U.S. Environmental Protection Agency Region 5 77 W. Jackson Blvd Chicago, IL 60604 r5hotline@epa.gov	Ms. Damarys Mortenson, State Conservationist Natural Resources Conservation Service USDA 6013 Lakeside Blvd Indianapolis, IN 46278-1989 damarys.mortenson@usda.gov
U.S. Fish and Wildlife Service Midwest Region 5600 American Blvd. West Suite 990 Bloomington, MN, 55437-1458 IndianaFO@fws.gov	Communications and Outreach Branch NOAA, N/NGS12 National Geodetic Survey, SSMC3 #8716 1315 East-West Highway Silver Spring, MD 20910-3282 rrae@noaa.gov

Indiana Department of Natural Resources Division of Historic Preservation and Archaeology 402 W. Washington Street, Room W274 Indianapolis, Indiana 46204 DHPARreview@dnr.IN.gov https://www.in.gov/dnr/historic	Daryl Maple, President Howard County, Indiana Daryl.maple@howardcountyin.gov
Indiana Department of Environmental Management Office of Air Quality 100 North Senate Avenue Indianapolis, IN 46204-2251 jlacker@idem.in.gov	Tyler O. Moore, Mayor City of Kokomo mayor@cityofkokomo.org

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September 10, 2025

VIA EMAIL AND/OR FIRST-CLASS MAIL

Jenny Orsburn
Indiana Coastal Resources Management Program
Indiana Department of Natural Resources
402 W. Washinton Street
Room W264
Indianapolis, IN 46204
jeorsburn@dnr.in.gov

Re: Central Railroad Company of Indianapolis – Abandonment Exemption –
in Howard County, Indiana
Surface Transportation Board Docket No. AB 511 (Sub. No. 8X)

Ms. Orsburn:

This letter is to advise you that Central Railroad Company of Indianapolis ("CERA") intends to file a notice of exemption for CERA to abandon two lines of railroad together referred to herein as the "Subject Line." CERA will abandon 1.38 miles of the Tipton Industrial Lead extending from approximately milepost 54.3 to milepost 55.6; and 0.44 miles of the Marion Subdivision extending from approximately milepost 180.82 to milepost 181.26. The Subject Line is located in Kokomo, Howard County, Indiana and traverses through United State Postal Zip Code 46903. A map of the Subject Line is enclosed hereto.

CERA intends to file with the Surface Transportation Board ("STB") a notice of exemption pursuant to the provisions of 49 CFR § 1152.50 to enable CERA to abandon the Subject Line, on or after November 3, 2025, in STB Docket No. AB 511 (Sub. No. 8X).

CERA understands that the City of Kokomo is interested in converting the Subject Line into a trail.

Based upon information in CERA's possession, the Subject Line does not contain federally granted rights of way.

In advance of preparing an environmental report as required by applicable STB regulations, CERA is consulting with appropriate agencies such as yours as to any concerns which they may have as to the environmental effects of the proposed abandonment. However, considering that the proposed abandonment is located in a county not designated as part of Indiana's coastal zone, it is CERA's assumption that no impact exists. Please confirm that our assumption is correct.

September 10, 2025
Page 2

We would appreciate an expression from you by October 10, 2025, that, within the area of your authority, you do not perceive that the abandonment will have a significant effect upon the environment (or expressing any concerns that you have). If you have any questions about the railroad's proposal or if you need assistance in this matter, please call me at (202) 772-0916.

Thank you for your cooperation.

Sincerely,

A handwritten signature in blue ink, reading "Justin J. Marks". The signature is fluid and cursive, with the first name "Justin" and last name "Marks" clearly legible.

Justin J. Marks
Counsel to Central Railroad Company of
Indianapolis

Enclosure



Lines to be abandoned shown in Red
CERA's Marion Subdivision shown in Blue
WSRY Rail Line leased to TPWR shown in Green

Created: 8/27/2025

Coordinates
86.1324°W 40.4953°N



0 0.2 0.4 mi

ENVIRONMENTAL/HISTORIC REPORT

EXHIBIT C

AGENCY RESPONSES

Marks, Justin J.

From: Bales, Ronald <rbales@indot.IN.gov>
Sent: Friday, September 12, 2025 7:21 AM
To: Marks, Justin J.
Cc: Passmore, Andrew D
Subject: RE: Consultation Letter: Railroad Abandonment in Howard County, Indiana

EXTERNAL EMAIL: The sender (rbales@indot.IN.gov) is external to Clark Hill. Exercise caution with links, attachments, or replies if this message is unexpected.

Thank you for the opportunity to comment. INDOT Environmental Services has no comment regarding the abandonment of railroad. Thank you.

Ron Bales

Environmental Section Supervisor

Indiana Department of Transportation

Greenfield District

Cell: (317) 515-7908

Email: rbales@indot.in.gov

[Find us on social media!](#)



From: Hilden, Laura <lhilden@indot.IN.gov>
Sent: Thursday, September 11, 2025 10:14 AM
To: Bales, Ronald <rbales@indot.IN.gov>
Cc: Passmore, Andrew D <APassmore@indot.IN.gov>
Subject: FW: Consultation Letter: Railroad Abandonment in Howard County, Indiana

Hi Ron!

This looks like an STB environmental review early coordination letter, which I've never seen before. Please feel free to respond directly if you think a response is needed at all.

Thanks and hope all's well out there!

Laura

Laura Hilden

317-552-9692

lhilden@indot.in.gov

From: Marks, Justin J. <jmarks@ClarkHill.com>
Sent: Wednesday, September 10, 2025 7:18 PM

To: Hilden, Laura <lhilden@indot.IN.gov>; INFO <INFO@idem.IN.gov>; info@nps.gov; DNR CSC Inquiry <cscinquiry@dnr.IN.gov>; lrcregweb@usace.army.mil; r5hotline@epa.gov; IndianaFO@fws.gov; damarys.mortenson@usda.gov; rrae@noaa.gov; Daryl.maple@howardcountyin.gov; ACKER, JENNY <JLACKER@idem.IN.gov>; mayor@cityofkokomo.org; SM.FPAC.NRCS.CLIMATE@usda.gov
Subject: Consultation Letter: Railroad Abandonment in Howard County, Indiana

This is the first time you received an email from this sender (jmarks@ClarkHill.com). Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

EXTERNAL EMAIL: This email was sent from outside your organization. Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

Please see the attached letter related to a proposal to abandon a line of railroad in Howard County, Indiana by the Central Railroad Company of Indianapolis.

Thank you,

Justin J. Marks

Attorney at Law

Clark Hill

1001 Pennsylvania Ave. N.W., Suite 1300 South, Washington, DC 20004
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jmarks@clarkhill.com | www.clarkhill.com

Marks, Justin J.

From: NOS NGS JIRA <ngs.infocenter@noaa.gov>
Sent: Monday, September 15, 2025 1:08 PM
To: Marks, Justin J.
Subject: [JIRA] (IMOV-16767) Consultation Letter: Railroad Abandonment in Howard County, Indiana

EXTERNAL EMAIL: The sender (ngs.infocenter@noaa.gov) is external to Clark Hill. Exercise caution with links, attachments, or replies if this message is unexpected.

A comment is added on your issue:

Re: Consultation Letter: Railroad Abandonment in Howard County, Indiana

Thank you for this information.

After reviewing the map of the proposed abandonment, the only benchmark located in the area shown is LB0425, which is set in a building and was last recovered in 2005. I do not believe the proposed abandonment will impact this or any other mark. I have included the description of LB0425 from the datasheet below.

"AT THE SOUTHEAST CORNER OF THE INTERSECTION OF NORTH WASHINGTON STREET AND WEST WALNUT STREET, ON WEST WALNUT STREET, AT THE CITY BUILDING, 5 YARDS WEST OF THE NORTH ENTRANCE, IN THE TOP OF A SHELF CUT IN THE TOP OF THE FIRST LAYER OF STONE AT THE NORTH SIDE OF THE BUILDING, AND 1 YARD HIGHER THAN THE SIDEWALK. A COPPER PLUG, MARKED CBM ELE 100 1903."

"

If you have any other question in this matter please feel free to contact me.

Timothy Salisbury

Physical Scientist,

NOAA National Geodetic Survey

N/NGS4 SSMC3 #8604

1315 East-West Hwy

Silver Spring MD 20910

Phone: [240 533 9620|tel:(240)%20533-9638]

This message was sent by Atlassian Jira (v9.12.13#9120013-sha1:30aec69)



ENVIRONMENTAL/HISTORIC REPORT

EXHIBIT D

NEWSPAPER NOTICE

AFFIDAVIT OF PUBLICATION

Northwest Indiana Times
601 W. 45th Ave.
(219) 933-3333

State of Florida, County of Broward, ss:

I, Ankit Sachdeva, of lawful age, being duly sworn upon oath depose and say that I am an agent of Column Software, PBC, duly appointed and authorized agent of the Publisher of Northwest Indiana Times, a publication that is a "legal newspaper" as that phrase is defined for the city of Munster, for the County of Lake, in the state of Indiana, that this affidavit is Page 1 of 2 with the full text of the sworn-to notice set forth on the pages that follow, and that the attachment hereto contains the correct copy of what was published in said legal newspaper in consecutive issues on the following dates:

Publication Dates:

- Oct 1, 2025

Notice ID: exexZZREoxF3iaNwYAvk

Publisher ID: COL-IN-102969

Notice Name: CERA Abandonment

Publication Fee: \$101.66

Ankit Sachdeva

Agent

VERIFICATION

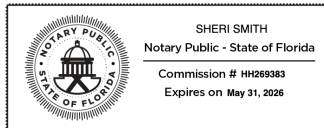
State of Florida
County of Broward

Signed or attested before me on this: 10/01/2025



Notary Public

Notarized remotely online using communication technology via Proof.



Notice of Intent to Abandon and Discontinue Rail Service

Central Railroad Company of Indianapolis (CERA) gives notice that on or after November 3, 2025, CERA intends to file with the Surface Transportation Board (STB), Washington, DC, a notice of exemption under 49 CFR part 1152, subpart F - Exempt Abandonments and Discontinuances permitting the abandonment of a line of railroad over a 1.77-mile line of railroad (the Line) to include, the "Tipton Industrial Lead" extending from milepost 54.3 to milepost 55.6 and a segment of the Marion Subdivision extending from milepost 180.87 to milepost 181.26. The Line traverses through United States Postal Service ZIP Code 46903 in the City of Kokomo, Howard County, Indiana. The CERA abandonment exemption proceeding will be docketed as No. AB 511 (Sub-No. 8X).

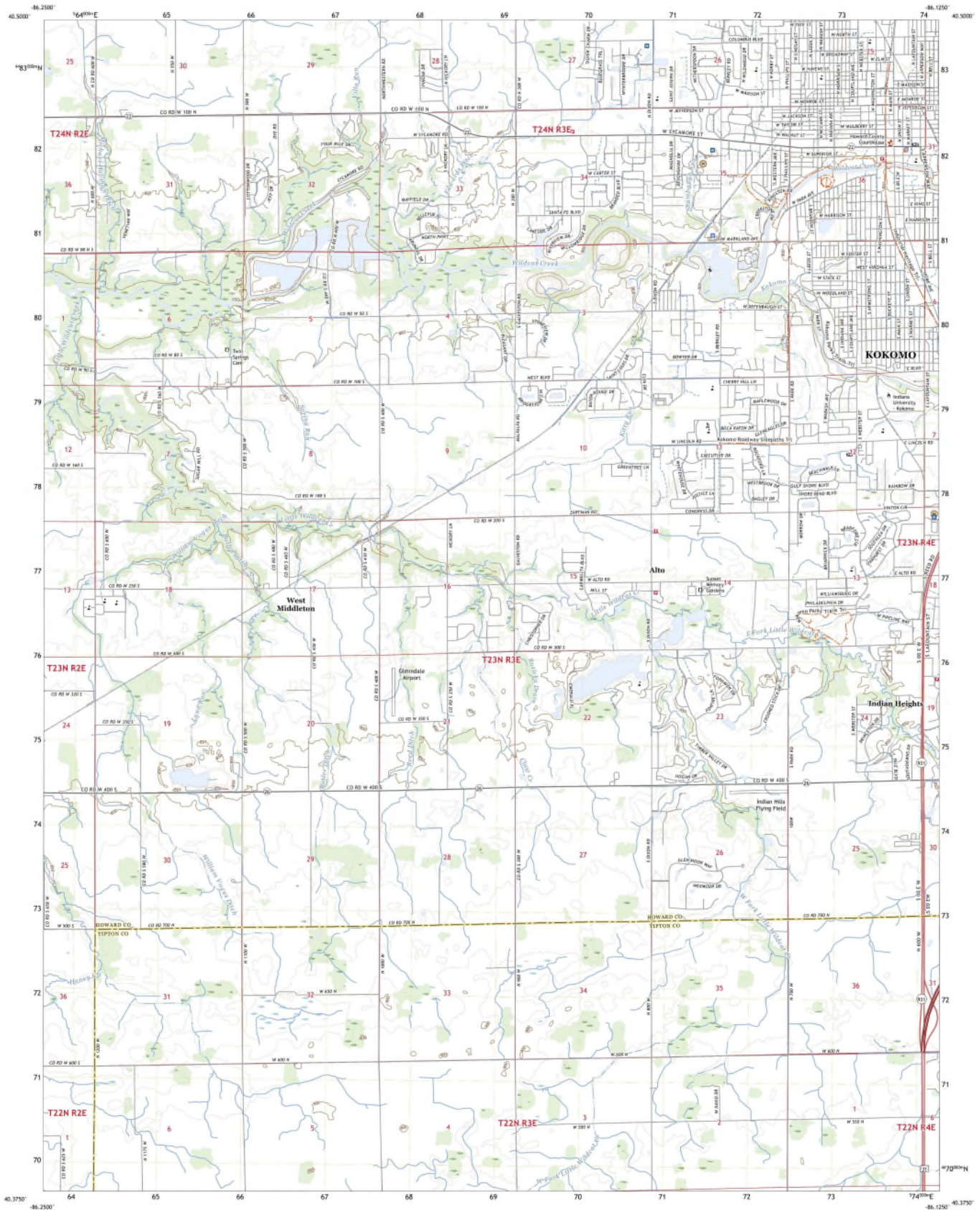
The STB's Office of Environmental Analysis (OEA) will generally prepare an Environmental Assessment (EA) in connection with CERA's proposed abandonment of the Line, which will normally be available 25 days after the filing of the abandonment notice of exemption. Comments on environmental and energy matters bearing on the EA associated with CERA's abandonment notice of exemption should be filed no later than 15 days after the EA becomes available to the public and will be addressed in an STB decision. Interested persons may obtain a copy of the EA or make inquiries regarding environmental matters by writing to OEA, Surface Transportation Board, Washington, DC or by calling OEA at (202) 245-0291.

Appropriate offers of financial assistance to continue rail service can be filed with the STB. Requests for environmental conditions, public use conditions, or rail banking/trails use also can be filed with the STB. Any pleading that raises matters other than environmental issues (such as trails use, public use, and offers of financial assistance where applicable) must be filed directly with the STB's Office of Chief Counsel either via e-filing or addressed to 395 E. Street S.W., Washington, DC 20423-0001 [See 49 CFR 1104.1(a) and 1104.3(a)], and one copy must be served on applicants' representative [See 49 CFR 1104.12(a)]. Questions regarding offers of financial assistance, public use or trails use may be directed to the STB's Office of Public Assistance, Governmental Affairs, and Compliance at (202) 245-0238. Copies of any comments or requests for conditions should be served on the applicant's representative: Justin J. Marks, Clark Hill PLC, 1001 Pennsylvania Ave. N.W. Suite 1300 South, Washington, DC 20004; jmarks@clarkhill.com.

ENVIRONMENTAL/HISTORIC REPORT

EXHIBIT E

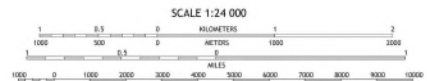
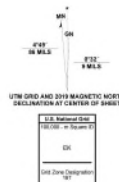
TOPOGRAPHICAL MAP



Produced by the United States Geological Survey

North American Datum of 1983 (NAD83)
World Geodetic System of 1984 (WGS84) Projection and
1000-meter grid Universal Transverse Mercator, Zone 18T
This map is not a legal document. Boundaries may be
generalized for this map scale. Private lands within government
responsibilities may not be shown. Obtain permission before
entering private lands.

Imagery: 1997, June 2000, June 2002
Roads: U.S. Census Bureau, 2006, 2019
Hydrography: National Hydrography Dataset, 2006, 2019
Contours: National Elevation Dataset, 2014
Boundaries: Multiple sources; see metadata file 2019, 2021
Public Land Survey System: BLM, 2020
Wetlands: FWS, National Wetlands Inventory, 1980



CONTOUR INTERVAL: 10 FEET
NORTH AMERICAN DATUM OF 1983
This map was produced to conform with the
National Geospatial Program US Topo Product Standard.



KOKOMO WEST, IN
2022

ENVIRONMENTAL/HISTORIC REPORT

EXHIBIT F

SHPO CORRESPONDENCE

Marks, Justin J.

From: Marks, Justin J.
Sent: Monday, September 8, 2025 7:20 PM
To: DHPARReview@dnr.IN.gov
Subject: New Section 106 Consultation Project: CERA Rail Line Abandonment
Attachments: CERA_Indiana_SHPO_Form.pdf

Attached please find the Review Request Submittal Form, a Cover Letter Explaining the CERA rail line abandonment, a map of the Subject Line to be abandoned, and the Section 106 agency delegation letter.

If you have any questions, please let me know.

Justin J. Marks

Attorney at Law

Clark Hill

1001 Pennsylvania Ave. N.W., Suite 1300 South, Washington, DC 20004
+1 202.772.0916 (office) | +1 703.215.6938 (cell) | +1 202.772.0930 (fax)
jmarks@clarkhill.com | www.clarkhill.com



REVIEW REQUEST SUBMITTAL

State Form 55031 (R2 / 3-23)

Indiana Department of Natural Resources

Division of Historic Preservation and Archaeology, Indiana State Historic Preservation Office (SHPO)



Please complete this form and attach it to the front of all submittals, along with any reports or supplemental materials you are providing to the Indiana DHPA for review. Please note that archaeological forms and reports shall be submitted in SHAARD, separate from structural information since archaeological site locations are confidential and not for public disclosure.

Date (month, day, year): September 8, 2015

- ☒ This is a new submittal.
☐ This is revised/additional information relating to DHPA number _____.
☐ This project is being undertaken pursuant to the terms and conditions of a programmatic or other interagency agreement.
Title of Agreement: _____
☐ This project will also be applying for Federal Rehabilitation Investment Tax Credit.
☐ This project includes work on a property that is under a preservation covenant held by DHPA.

THIS REVIEW REQUEST SUBMITTED BY:

Name: Justin Marks
Company/Organization: Clark Hill PLC
Address (number and street): 1001 Pennsylvania Ave. N.W., Suite 1300 South
City: Washington State: DC ZIP: 20004
Telephone number: 202 772 0916 E-mail address: jmarks@clarkhill.com

PROJECT NAME & LOCATION [Please attach a map with location(s) marked]

Project Name/Reference: CERA Abandonment Project/Des Number: _____
Project Address/Location: Tipton Industrial Lead: milepost 54.3 to milepost 55.6 and Marion Subdivision: milepost 180.82 to milepost 181.26
City: Kokomo Township(s): _____
County/Countries: Howard
Section/Township/Range: _____
Latitude/Longitude: _____

STATE OR FEDERAL AGENCY INVOLVEMENT

Agency: _____ Program: _____
Type of funds, license, or permit to be obtained (if applicable): _____
Name of Agency Contact: _____
Address (number and street): _____
City: _____ State: _____ ZIP: _____
Telephone number: _____ E-mail address: _____

APPLICANT (if different than Federal Agency) *If available, please attach copy of authorization letter from federal agency.*

Applicant: Central Railroad Company of Indianapolis

Name of Contact: Justin Marks

Address (number and street): 1001 Pennsylvania Ave. N.W., Suite 1300 South

City: Washington State: DC ZIP: 20004

Telephone number: 202 772 0916 E-mail address: jmarks@clarkhill.com

ADDITIONAL CONTACT (IF APPLICABLE)

Name of Contact: _____

Organization/Agency: _____

Address (number and street): _____

City: _____ State: _____ ZIP: _____

Telephone number: _____ E-mail address: _____

Project Description – This should include a detailed scope of work, including any actions to be taken in relation to the project, such as all aspects of new construction, replacement/repair, demolition, ground disturbance, and all ancillary work (temporary roads, etc.), as applicable. Attach report or additional pages if necessary. If a detailed scope of work is not available yet, please explain and include all preliminary information.

Central Railroad Company of Indianapolis (“CERA”) intends to file a notice of exemption for CERA to abandon two lines of railroad together referred to herein as the “Subject Line.” CERA will abandon 1.38 miles of the Tipton Industrial Lead extending from approximately milepost 54.3 to milepost 55.6; and 0.44 miles of the Marion Subdivision extending from approximately milepost 180.82 to milepost 181.26. The Subject Line is located in Kokomo, Howard County, Indiana and traverses through United State Postal Zip Code 46903.

CERA intends to file with the Surface Transportation Board (“STB”) a notice of exemption pursuant to the provisions of 49 CFR § 1152.50 to enable CERA to abandon the Subject Line, on or after November 3, 2025, in STB Docket No. AB 511 (Sub. No. 8X).

Ground Disturbing Activity – This should include a detailed description of all proposed horizontal and vertical ground disturbance in relation to the project as well as any known previous and current land use, condition, and disturbances. Attach additional pages if necessary. Indicate if the project does not include any ground disturbing activities. Please note that agricultural tilling generally does not have a serious enough impact on archaeological sites to constitute a disturbance of the ground for this purpose.

The proposed abandonment may result in the salvage of the rail and track materials on the right of way.

ARCHAEOLOGICAL INVESTIGATION

If an archaeological investigation has been conducted for this project, the resulting report and site forms (if applicable) must be submitted in the State Historic Architectural and Archaeological Research Database (SHAARD) by the qualified archaeologist. DO NOT attach the archaeology report here.

For an archaeological report submitted in SHAARD, please indicate the SHAARD report number (i.e. AR-xx-xxxxxx).

SHAARD report number _____

FINDINGS – Please note that a finding should only be submitted when the agency/delegatee believes it is appropriate or one has been requested by our office. Only those who represent the Federal Agency or an official delegatee of the federal agency are authorized to make findings of effect for an undertaking.

☐ **No Historic Properties Affected** – (i.e., none are present or there are historic properties present but the project will have no effect upon them). Attach necessary documentation, as described at 36 CFR 800.11.

☐ **No Adverse Effect** – The proposed undertaking will have no adverse effect on one or more historic properties located within the project APE under 36 CFR 800.5. Attach necessary documentation, as described at 36 CFR 800.11.

☐ **Adverse Effect** – The proposed undertaking will result in an adverse effect to one or more historic properties and the applicant, or other federally authorized representative, will consult with the SHPO and other consulting parties to resolve the adverse effect per 36 CFR 800.6. Attach necessary documentation, as described at 36 CFR 800.11, with a proposed plan to resolve adverse effect(s).

Please explain the basis for your determination.

Authorized Signature: _____ Date (month, day, year): _____

Type or print name: _____

Organization/Agency: _____

Please note that incomplete submissions may result in delays. To ensure an expeditious review, please be sure that the following has been provided:

- ☒ Completed Review Request Submittal Form
- ☒ Letter of authorization from Federal agency/agencies (if applicable)
- ☐ Consulting Parties – List of all consulting parties that have been invited to participate and copies of any responses received. Typical consulting parties would include the county historian, local historical society, the appropriate regional office of Indiana Landmarks, other local, state or national preservation organizations, tribes, local government and the general public.
- ☐ Map of project location with project area(s) and Area of Potential Effects (APE) clearly marked, streets labeled and a north arrow, aerial maps are preferable and areas of previous and proposed ground disturbance within the project area should be shown. Please indicate if any of the project area is located on state or federal property.
- ☐ Clear, current color photographs of project area and APE, including any buildings or structures fifty (50) years or older within the APE. (PDF format, no more than two (2) photographs per page). For large project areas/APEs, photo size may be reduced, or photos and photo log provided to DHPA approved file sharing or ftp site. Contact DHPA for current list of accepted sites.
- ☐ Architectural/Engineering Drawings (if applicable) – Must be labeled with north arrow, clearly indicate proposed changes to existing buildings and locations of any ground disturbance on site plans. Include both existing and proposed drawings/plans in PDF format. For large projects, plans may be provided by a DHPA approved file sharing or ftp site and/or hard copies no smaller than 11" x 17" with legible font.
- ☐ Identification of any known historic resources – All projects should consult the SHAARD database (access available on the DHPA home page) to locate known historic resources in the project area and APE. For any identified resources, the submission should include (in summary form) a list of the properties identified, including address, the site/reference number from SHAARD, the rating (IHSSI, Bridge Inventory) or status (National Register) of each property, and a current photograph. Please do not submit print outs of the individual SHAARD records.
- ☐ Archaeological report and site forms (if applicable) submitted in SHAARD for DHPA review. Do not attach to this form.
- ☐ Projects using State of Indiana funds to alter, demolish or remove a historic site or structure, include Application for a Certificate of Approval (SF 52889).

The thirty (30) day review period, as specified in 36 CFR part 800.3(c)(4), begins from the date that we receive the complete submission.

Return this Form and Attachments to:

**Indiana Department of Natural Resources
Division of Historic Preservation and Archaeology
402 W. Washington Street, Room W274
Indianapolis, Indiana 46204**

<http://www.in.gov/dnr/historic>

Justin J. Marks
T (202) 772-0916
F +12027720919
Email:jjmarks@ClarkHill.com

Clark Hill
1001 Pennsylvania Avenue N.W.
Suite 1300 South
Washington, DC 20004
T (202) 772-0909
F (202) 772-0919

September 8, 2025

VIA EMAIL AND/OR FIRST-CLASS MAIL

Indiana Department of Natural Resources
Division of Historic Preservation and Archaeology
402 W. Washington Street, Room W274
Indianapolis, Indiana 46204

DHPARReview@dnr.IN.gov

Re: Central Railroad Company of Indianapolis – Abandonment Exemption –
in Howard County, Indiana
Surface Transportation Board Docket No. AB 511 (Sub. No. 8X)

To whom it may concern:

This letter is to advise you that Central Railroad Company of Indianapolis ("CERA") intends to file a notice of exemption for CERA to abandon two lines of railroad together referred to herein as the "Subject Line." CERA will abandon 1.38 miles of the Tipton Industrial Lead extending from approximately milepost 54.3 to milepost 55.6; and 0.44 miles of the Marion Subdivision extending from approximately milepost 180.82 to milepost 181.26. The Subject Line is located in Kokomo, Howard County, Indiana and traverses through United State Postal Zip Code 46903. A map of the Subject Line is enclosed hereto.

CERA intends to file with the Surface Transportation Board ("STB") a notice of exemption pursuant to the provisions of 49 CFR § 1152.50 to enable CERA to abandon the Subject Line, on or after November 3, 2025, in STB Docket No. AB 511 (Sub. No. 8X).

CERA understands that the City of Kokomo is interested in converting the Subject Line into a trail.

Based upon information in CERA's possession, the Subject Line does not contain federally granted rights of way.

In advance of preparing a historical report as required by applicable STB regulations, CERA is consulting with you as to any concerns which you may have as to the effects on historical resources of the proposed abandonment.

We would appreciate an expression from you by October 10, 2025, that, within the area of your authority, you do not perceive that the abandonment will have a significant effect upon on historical resources (or expressing any concerns that you have). If you have any questions

September 8, 2025
Page 2

about the railroad's proposal or if you need assistance in this matter, please call me at (202) 772-0916.

Thank you for your cooperation.

Sincerely,

A handwritten signature in blue ink, reading "Justin J. Marks". The signature is written in a cursive, flowing style.

Justin J. Marks
Counsel to Central Railroad Company of
Indianapolis

Enclosure



Lines to be abandoned shown in Red
CERA's Marion Subdivision shown in Blue
WSRY Rail Line leased to TPWR shown in Green

Created: 8/27/2025

Coordinates
86.1324°W 40.4953°N



0 0.2 0.4 mi



SURFACE TRANSPORTATION BOARD
Washington, DC 20423

To: State Historic Preservation Officers and Tribal Historic Preservation Officers

Re: Delegation of Authority for the Section 106 Review of Rail
Abandonment Projects

Date: December 10, 2009

Under the regulations of the Surface Transportation Board (STB or Board), railroad applicants seeking to abandon rail lines must prepare Historic Reports and submit these reports to the State Historic Preservation Officer (SHPO) in the state or states where the rail line proposed for abandonment is located for SHPO's review and comment. Applicants must submit the Historic Reports to SHPOs at least 20 days before filing for abandonment authority before the Board. The Board developed this early consultation process to provide more information "upfront" to assist SHPOs, railroads, and Board staff to consider whether a proposed abandonment would affect any historic sites and structures. This "upfront" review is necessary because of the tight regulatory timeframes established by Congress governing rail line abandonment cases.

Some SHPOs have expressed reluctance with reviewing the Historic Reports because they are prepared by the railroad, or in many cases, by an attorney representing a railroad, rather than by the Board, the federal agency responsible for compliance with the National Historic Preservation Act (NHPA). Consequently, some SHPOs do not respond to the Historic Reports, feeling strongly that the Section 106 process under NHPA is not appropriately begun until the Board sends a letter to the SHPO formally initiating the Section 106 historic review process.

To ensure that the Board's requirements are consistent with those of NHPA, the Board has determined pursuant to 36 CFR Section 800.2(c)(4) and our environmental regulations at 49 CFR 1105, that **applicants seeking authority from the Board to abandon railroad lines may act on behalf of the Board when complying with the Section 106 regulations of NHPA.**

Accordingly, applicants and their authorized representatives, such as attorneys acting on their behalf, may consult with SHPOs to initiate the review process established under 36 CFR Part 800 and to carry out some of its steps. Specifically, applicants are authorized to gather information to identify and to work with consulting parties to assess effects. The Board retains the responsibility to mitigate adverse effects, document its findings, and conclude the Section 106 review.

Rail abandonment applicants and their representatives must involve the Board in consultation whenever:

- There is a disagreement between an applicant or its authorized representatives and SHPO regarding the area of potential effect, identification and evaluation of historic properties, or assessment of effects;
- There is a disagreement between a potential consulting party and the applicant regarding the party's involvement in the Section 106 review process; or
- There is the potential for foreclosure of the opportunity to comment or anticipatory demolition pursuant to 36 CFR Section 800.9(b) and 36 CFR Section 800.9(c), respectively.

Attached is a one-page summary of the Board's Section 106 review process. In addition, the Board has developed historic preservation guidance that explains our historic preservation process in more detail (see www.stb.dot.gov/stb/environment/HistoricPreservation/Guidance). General information regarding the Board is available on the Board's website at www.stb.dot.gov.

If you have any questions regarding any of the above, please free to contact me or Catherine Glidden of my staff at 202-245-0293 or gliddenc@stb.dot.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Victoria Rutson". The signature is fluid and cursive, with the first name "Victoria" and last name "Rutson" clearly distinguishable.

Victoria Rutson
Chief, Section of Environmental Analysis
Federal Preservation Officer for the Board

Division of Historic Preservation & Archaeology 402 W. Washington Street, W274 Indianapolis, IN 46204-2739
Phone 317-232-1646 Fax 317-232-0693 dhp@dnr.IN.gov

September 16, 2025

Justin Marks
Attorney at Law
Clark Hill PLC
1001 Pennsylvania Avenue N.W., Suite 1300 South
Washington D.C. 20004

Federal Agency: Surface Transportation Board

Re: Information regarding a notice of exemption for Central Railroad Company of Indianapolis' abandonment of 1.38 miles on CERA's Tipton Industrial Lead, approximately milepost 54.3 to milepost 55.6; and 0.44 miles of the Marion Subdivision extending from approximately milepost 180.82 to milepost 181.26. (Docket No. AB 511 [Sub. No. 8X]; DHPA #34671)

Dear Mr. Marks:

Pursuant to Section 106 of the National Historic Preservation Act (54 U.S.C. § 306108) and 36 C.F.R. Part 800, the staff of the Indiana State Historic Preservation Officer ("Indiana SHPO") has conducted an analysis of the materials dated and received on September 8, 2025, for the above indicated project in Kokomo, Howard County, Indiana.

In regard to archaeology resources, railroads or railways older than 50 years are considered archaeological features and would need to be recorded as an archaeological site and documented as described in Appendix A-Recording Linear resources in the DNR-DHPA *Guidebook for Indiana Historic Sites and Structure Inventory – Archaeological Sites* (2022). In use, modern (less than 50 years old) linear elements would not need to be recorded as an archaeological site unless they exhibit unique characteristics. Archaeological sites will be documented, including assigning an archaeological site number, and evaluated for National Register of Historic Places and/or Indiana Register of Historic Sites and Structures eligibility. Contiguous portions of an archaeological resource, within the same county, will be assigned the same archaeological site number.

In regard to buildings and structures, we have identified the Lake Erie and Western Depot Historic District, NR-1960, listed in the National Register of Historic Places on September 17, 2008, within the probable area of potential effects. According to this district's nomination, three sets of railroad tracks (including two sidings & one main through track) between West Jefferson Street and West Jackson Street contribute to the significance of this district.

Based upon the information provided to our office, we believe there may be effects on the above identified historic property qualifying it for inclusion in or eligibility for the National Register (*see* 36 C.F.R. § 800.16[i]). In order for our office to determine any effects upon historic properties, please provide the following information:

- 1) Please provide current photos showing the section of tracks between West Jefferson Street and West Jackson Street.
- 2) Does the Central Railroad Company of Indianapolis ("CERA") own all three sets of tracks between West Jefferson Street and West Jackson Street? If so, does the proposed abandonment include all three tracks, or just the main line?
- 3) We note the statement "the proposed abandonment may result in the salvage of the rail and track materials on the right of way." Additionally, the submission states that the City of Kokomo is interested in converting the subject line into a trail. Will the section of the tracks that contribute to the district between West Jefferson Street and West Jackson Street be removed as part of the abandonment?

- 4) The adjacent depot at 500 North Buckeye Street appears to be privately owned. Are there any buildings or structures owned by CERA located along the project corridor that will be abandoned as a result of the project?

Given the nature of the proposed undertaking, we recommend that the Howard County Historian, Howard County Historical Society, City of Kokomo Historic Review Board, and Central Regional Office of Indiana Landmarks be invited to participate as consulting parties and be provided with a full copy of all documentation pertaining to this project. We believe that their advice and consultation would be helpful in resolving the potential adverse effects of this undertaking.

Gilbert Porter
Howard County Historian
2600 W 350 N
Kokomo, Indiana 46901
gilbertporter@kokomoeearlyhistory.org

Anne Shaw, Executive Director
Howard County Historical Society/Howard County Museum
1200 West Sycamore Street
Kokomo, Indiana 46901
anne.shaw@howardcountymuseum.org

Tom Tolen, President
City of Kokomo Historic Review Board
100 S. Union St
Kokomo, Indiana 46901

Mark Dollase, Vice President of Preservation Services &
Alex Brooks, Community Preservation Specialist
Indiana Landmarks Central Regional Office
1201 Central Avenue
Indianapolis, Indiana 46202-3204
central@indianalandmarks.org

Once the indicated information is received, the Indiana SHPO will resume identification and evaluation procedures for this project. Please keep in mind that additional information may be requested in the future.

The 36 C.F.R. Part 800 regulations governing the Section 106 review process may be found at www.achp.gov. If you have questions about archaeological issues please contact Melody Pope at (317) 234-5254 or mpope@dnr.IN.gov. If you have questions about buildings or structures please contact Caitlin Lehman at (317) 232-0461 or clehman1@dnr.IN.gov. Additionally, in all future correspondence regarding the above indicated project, please refer to DHPA #34671.

Very truly yours,



Beth K. McCord
Deputy State Historic Preservation Officer

BKM:CML:MKP:CML:cml

cc: Tom Tolen, City of Kokomo Historic District Review Board
emc: Justin Marks, Clark Hill PLC
Adam Assenza, Surface Transportation Board, Office of Environmental Analysis
Mark Dollase, Indiana Landmarks
Gilbert Porter, Howard County Historian
Anne Shaw, Howard County Historical Society / Howard County Museum

Justin J. Marks
T (202) 772-0916
F +12027720919
Email:jjmarks@ClarkHill.com

Clark Hill
1001 Pennsylvania Avenue N.W.
Suite 1300 South
Washington, DC 20004
T (202) 772-0909
F (202) 772-0919

November 5, 2025

VIA EMAIL

Beth K. McCord, Deputy State Historic Preservation Officer
Indiana Department of Natural Resources
Division of Historic Preservation and Archaeology
402 W. Washington Street, Room W274
Indianapolis, Indiana 46204

DHPARreview@dnr.IN.gov

Re: Central Railroad Company of Indianapolis – Abandonment Exemption –
in Howard County, Indiana
Surface Transportation Board Docket No. AB 511 (Sub. No. 8X)
DHPA #34671

Dear Ms. McCord:

Central Railroad Company of Indianapolis ("CERA") is in receipt of your September 16, 2025 letter seeking information regarding CERA's proposal to abandon segments of the Tipton Industrial Lead and Marion Subdivision in the City of Kokomo, Howard County, IN and appreciates your agency's prompt response. This letter is intended to clarify the scope of the abandonment, provide CERA's view of the area of potential effects ("APE"), and to provide answers to your questions.

First, a point of clarification. In CERA's submission to you, CERA indicated that it will abandon 1.38 miles of the Tipton Industrial Lead extending from approximately milepost 54.3 to milepost 55.6; and 0.44 miles of the Marion Subdivision extending from approximately milepost 180.82 to milepost 181.26. Upon reconsideration, CERA is shortening the amount of rail line it will abandon on the Marion Subdivision. CERA will abandon from milepost 180.87 to milepost 181.26, totaling 0.39 miles of the Marion Subdivision – 0.05 less than previously stated.

Second, the National Historic Preservation Act ("NHPA") requires that federal agencies (such as the STB) must take into account the effect of their actions on any historic properties included or eligible for inclusion in the National Register of Historic Places, 54 U.S.C. 306108, that the scope of the required review is determined by the extent of the APE or "project area," and that the APE is limited by the extent of the agency's jurisdiction to control or mitigate any impacts.

NHPA does not require an evaluation of the effects on the area outside of the project. In the case of abandonment actions, the STB has determined that the APE or "project area" is limited to the railroad right of way ("ROW"). This is because the STB's conditioning authority

November 5, 2025

Page 2

extends only to the Applicant's common carrier rail line and associated property. In this case, the segments of the ROW to be abandoned varies in width, but specifically the segment that you appear to be interested in (between West Jefferson Street and West Jackson Street) is approximately 49 feet wide.

Finally, in response to your request for information. CERA has collaborated with the City of Kokomo to provide you with the information below and CERA is copying Carey Stranahan, P.E., the Acting City Engineer.

Question 1: Please provide current photos showing the section of tracks between West Jefferson Street and West Jackson Street.

Enclosed, please see the attached photo.

Question 2: Does the Central Railroad Company of Indianapolis ("CERA") own all three sets of tracks between West Jefferson Street and West Jackson Street? If so, does the proposed abandonment include all three tracks, or just the main line?

No, CERA only owns two sets of tracks. The proposed abandonment would include CERA's right-of-way that (as noted above) measures 49 feet across from West Jefferson Street to West Jackson Street.

Question 3: We note the statement "the proposed abandonment may result in the salvage of the rail and track materials on the right of way." Additionally, the submission states that the City of Kokomo is interested in converting the subject line into a trail. Will the section of the tracks that contribute to the district between West Jefferson Street and West Jackson Street be removed as part of the abandonment?

The City owns the tracks that lie east of the depot and the City has told CERA that it does not intend to remove the tracks. However, those tracks are not associated with this undertaking. The City is negotiating with CERA to acquire the right-of-way and as part of that negotiation is asking CERA to leave the tracks in place that extend from West Jefferson Street to West Jackson Street. All other track that constitutes the line to be abandoned may be salvaged.

Question 4: The adjacent depot at 500 North Buckeye Street appears to be privately owned. Are there any buildings or structures owned by CERA located along the project corridor that will be abandoned as a result of the project?

No, CERA owns no other buildings or structures that would be abandoned. As an FYI, the City of Kokomo obtained the depot at 500 North Buckeye from CERA in 2014. This transaction required no STB action. "Kokomo Train Depot LLC", the current owner, is owned by a non-profit controlled by the City of Kokomo.

November 5, 2025
Page 3

If you have any questions about the information contained in this letter, please email or call me at jmarks@clarkhill.com / (202) 772-0916.

Sincerely,



Justin J. Marks
Counsel to Central Railroad Company of
Indianapolis

Enclosure

cc via email: Adam Assenza, Surface Transportation Board, Office of Environmental Analysis
Mark Dollase, Indiana Landmarks
Gilbert Porter, Howard County Historian
Anne Shaw, Howard County Historical Society / Howard County Museum
Carey Stranahan, City of Kokomo, Acting City Engineer

cc via U.S. Postal Service: Tom Tolen, City of Kokomo Historic District Review Board



CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of November, I served a copy of the foregoing Environmental and Historic Report on the persons listed below by email or first class mail, postage prepaid:

Laura Hilden, Director-Environmental Services Indiana Department of Transportation 100 N. Senate Ave. IGCN 758-ES Indianapolis, IN 46204 lhilden@indot.in.gov	National Park Service Midwest Region Interior Regions 3, 4, 5 601 Riverfront Drive Omaha, NE 68102
Indiana Department of Environmental Management 100 N Senate Ave, Indianapolis, IN 46204 info@idem.IN.gov	National Park Service 1849 C Street, NW Washington, DC 20240
Indiana Coastal Resources Management Program Indiana Department of Natural Resources (DNR) 402 W. Washington Street, Room W264 Indianapolis, IN 46204. JeOrsburn@dnr.IN.gov - Jenny Orsburn, Program Manager	Indiana Game Commission 101 W. Washington Street East Tower, Suite 1600 Indianapolis, IN 46204 CSCinquiry@dnr.IN.gov
U.S. Army Corps of Engineers Regulatory Branch 231 LaSalle Street Suite 1500 Chicago, IL 60604 lrcregweb@usace.army.mil	Natural Resources Conservation Service USDA Office of the Chief 1400 Independence Ave., SW Room 5105-A Washington, DC 20250 SM.FPAC.NRCS.CLIMATE@usda.gov
U.S. Environmental Protection Agency Region 5 77 W. Jackson Blvd Chicago, IL 60604 r5hotline@epa.gov	Ms. Damaris Mortenson, State Conservationist Natural Resources Conservation Service USDA 6013 Lakeside Blvd Indianapolis, IN 46278-1989 damarys.mortenson@usda.gov

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