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February 24, 2026

Alan Tabachnick
Federal Preservation Officer
Surface Transportation Board
Office of Environmental Analysis
395 E Street SW
Washington, DC 20423

Federal Agency: Surface Transportation Board ("STB")

Re: Additional information and Surface Transportation Board's finding of "no adverse effect" regarding a notice of exemption for Central Railroad Company of Indianapolis' abandonment of approximately 1.36 miles on CERA's Tipton Industrial Lead, approximately milepost 54.3 to milepost 55.66; and approximately 0.39 miles of the Marion Subdivision extending from approximately milepost 180.87 to milepost 181.26 (Docket No. AB 511 [Sub. No. 8X]; DHPA #34671)

Dear Mr. Tabachnick:

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 February 14, 2026, and received on February 16, 2026, and a finding of effect dated and received on February 17, 2026, for the above indicated project in Kokomo, Howard County, Indiana.

As stated in the February 14, 2026, letter from Clark Hill, we note that the project area on the Tipton Industrial Lead has been extended from milepost 55.6 to 55.66. Our assumption is that the additional 0.06 miles (317 feet) extends north of the existing project area shown on the maps with your September 8, 2025, submission, in which case, we have not identified any additional historic buildings, structures, districts, or objects listed in or eligible for inclusion in the National Register of Historic Places within the probable area of potential effects. If, however, this additional 0.06 miles extends south of the existing project area, we note that the Kokomo Courthouse Square Historic District, NR-2084, listed in the National Register of Historic Places on December 22, 2008, may be within close proximity of the project area. Please note that the nomination for this district lists railroad tracks and a railroad watchman tower as contributing resources. If it is anticipated that the extended project area will travel south of Mulberry Street, please advise us. Otherwise, we have no concerns about the project extension.

We acknowledge the comments provided by other consulting parties since our office's last correspondence about this project. In an email dated November 25, 2025, Anne Shaw of the Howard County Historical Society and Kokomo Review Board provided comments about the size of the area of potential effects and voiced concerns for effects upon a house at 904 North Buckeye Street. Alex Brooks, of the Indiana Landmarks Central Regional Office, echoed these comments in his December 8, 2025, email.

The NRHP eligibility of the house at 904 North Buckeye Street remains unevaluated. The undertaking, which includes abandonment of the railroad line including possible salvage of rail and track, appears to be occurring immediately adjacent to this resource. Given the previous statement by Clark Hill in its November 5, 2025, letter that "CERA owns no other buildings or structures that would be abandoned," it is our understanding that the house, itself, would not face direct, physical effects as a result of the undertaking. In their correspondence, Ms. Shaw and Mr. Brooks emphasized the potential indirect effects of the project that could occur as a result of visual and auditory changes.

Considering the range of effects that could occur as a result of this undertaking, we do not estimate that the house at 904 North Buckeye Street is likely to be adversely affected if it were determined to be an eligible historic resource. However, if STB finds that this property is within its area of potential effects, then we believe it would be appropriate for STB to apply National Register criteria in consultation with the Indiana SHPO, proceed to evaluate effects upon the property if it is determined that it is an eligible resource, and continue the consultation to resolve the concerns expressed by other consulting parties. Similarly, if the project changes, further consultation would be needed.

As previously stated, 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.

We appreciate the clarification included with your February 17, 2026, submission, noting that the tracks within this district will be left in place. Based on the information provided to our office, we do not believe the characteristics that qualify the Lake Erie and Western Depot Historic District for inclusion in the National Register will be diminished as a result of this project. As previously stated, in terms of archaeology, if any sections of the subject line older than 50 years require removal, then further consultation would be needed.

Therefore, we concur with the STB's February 17, 2026, finding that there are no historic buildings, structures, districts, objects, or archaeological resources within the area of potential effects that will be adversely affected by the above indicated project.

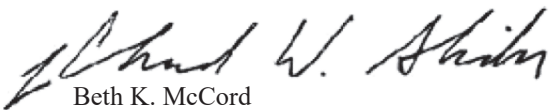
This identification is subject to the following condition:

- The project activities remain within areas disturbed by previous construction.

If any prehistoric or historic archaeological artifacts or human remains are uncovered during construction, demolition, or earthmoving activities, state law (Indiana Code 14-21-1-27 and 29) requires that the discovery must be reported to the Department of Natural Resources within two (2) business days. In that event, please call (317) 232-1646. Be advised that adherence to Indiana Code 14-21-1-27 and 29 does not obviate the need to adhere to applicable federal statutes and regulations, including but not limited to 36 C.F.R. 800.

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.

Very truly yours,



Beth K. McCord
Deputy State Historic Preservation Officer

BKM:CML:MKP:cml

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