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

May 8, 2026

Cindy Shively Klem
Indiana Brownfields Program
Indiana Finance Authority
100 North Senate Avenue, Suite 1275
Indianapolis, Indiana 46204

Federal Agency: Environmental Protection Agency

Re: Project information regarding the environmental remediation of the Clover Leaf Round House, Machine Shop, Coach Shop, and Outbuilding No. 3 at West Clinton Drive and Short Myrtle Street using Indiana Brownfields Program funds (DHPA #35629)

Dear Ms. Klem:

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 April 21, 2026, for the above indicated project in Frankfort, Clinton County, Indiana.

We understand that a 128(a) IIIA grant from the Environmental Protection Agency will be used for environmental remediation, specifically the removal of asbestos from the Railroad Roundhouse Building, Outbuilding No. 3, and debris piles within the Machine Shop and the Coach Shop. You also note that the buildings will later be demolished using state funds from the Indiana Economic Development Corporation. Please note that if the environmental remediation is part of the demolition project, then the entirety may be subject to this Section 106 review, regardless of whether the demolition work is funded by other funds or a combination of sources.

In regard to buildings and structures, we have identified the Nickle Plate-Clover Leaf Rail Yard within the probable area of potential effects, and we believe that it meets the criteria of eligibility for that National Register of Historic Places due to its historical significance. Despite its deteriorated conditions, this complex, including the Clover Leaf Round House (Site #023-221-41003), turntable (Site #023-221-41002), and extant associated workshops, displays sufficient integrity to be considered eligible under Criterion A in the area of Transportation for its role as a major maintenance hub for the Clover Leaf Railroad system, which was later absorbed by the Nickel Plate.

Based upon the available information, we do not believe that asbestos remediation at the site, by itself, would diminish the characteristics which make the above identified historic property significant, however if the Environmental Protection Agency defines its undertaking to encompass additional project activities beyond those noted above, further consultation would be necessary.

In terms of archaeology, no currently known archaeological resources listed in or eligible for inclusion in the National Register of Historic Places have been recorded within the proposed project area. No archaeological investigations appear necessary provided that any ground disturbing activities associated with the asbestos remediation efforts remain within areas disturbed by previous construction/demolition activities. However, similarly, if the Environmental Protection Agency defines its undertaking to encompass additional project activities beyond those noted above, further consultation would be necessary.

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

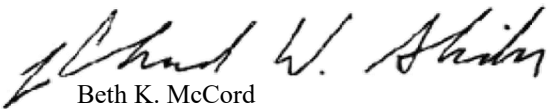
of Natural Resources within two (2) business days. In that event, please call (317) 232-1646. Be advised that adherence to Indiana Code 14-21-1-27 and 29 does not obviate the need to adhere to applicable federal statutes and regulations, including but not limited to 36 C.F.R. 800.

Upon completing its own identification and evaluation efforts, it would be appropriate for the U.S. Environmental Protection Agency to analyze the information that has been gathered from the Indiana SHPO, the general public, and any other consulting parties and make the necessary determinations and findings. Please refer to the following comments for guidance:

- 1) If the Environmental Protection Agency believes that a finding of “no adverse effect” accurately reflects its assessment, then it shall provide documentation of its finding as set forth in 36 C.F.R. § 800.11(e) to the Indiana SHPO, notify all consulting parties, and make the documentation available for public inspection (36 C.F.R. §§ 800.5[b-c] and 800.2[d][2]).
- 2) If, on the other hand, the Environmental Protection Agency believes that a finding of “adverse effect” accurately reflects its assessment, then it shall provide notification to the Advisory Council on Historic Preservation by providing the documentation in 36 C.F.R. § 800.11(e) as stated in 36 C.F.R. § 800.6(a)(1). Additionally, the Environmental Protection Agency may proceed to provide documentation of its finding as set forth in 36 C.F.R. § 800.11(e) to the Indiana SHPO, all consulting parties, and make the documentation available for public inspection and proceed to seek ways to avoid, reduce and mitigate effects as stated in 36 C.F.R. § 800.6 (a)(2-5).

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 Amy Johnson at (317) 232-6982 or ajohnson@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 #35629.

Very truly yours,



Beth K. McCord
Deputy State Historic Preservation Officer

BKM:CML:ALJ:cml

emc: Cindy Shively Klem, Indiana Finance Authority
Ashley Green, U.S. Environmental Protection Agency