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Division of Historic Preservation & Archaeology 402 W. Washington Street, W274 Indianapolis, IN 46204-2739  
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June 19, 2025

Cindy Shively Klem  
Indiana Brownfields Program  
Indiana Finance Authority  
100 North Senate Ave., Ste 1275  
Indianapolis, Indiana 46204

Federal Agency: U.S. Environmental Protection Agency

Re: Project information regarding abatement of asbestos at the former RMG Foundry located at 500 South Union Street using Indiana Brownfields Program funds (DHPA #34164)

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 June 2, 2025, for the above indicated project in Mishawaka, Penn Township, St. Joseph County, Indiana.

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 asbestos abatement 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.

In regard to buildings and structures, we noted the historical information provided in the submission that the project site was developed around 1878 as the Dodge Manufacturing Company sawmill and factory, and continued operations until 2006. We have identified the following property within the probable area of potential effects, and we believe that it meets the criteria of eligibility for inclusion in the National Register of Historic Places due to its historical and architectural significance:

Dodge Manufacturing Company/RMG Foundry. The complex displays sufficient integrity to be considered eligible under Criterion A in the area of Industry and under Criterion C as good examples of late 19th/early 20th century industrial buildings.

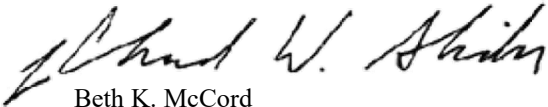
We note from your letter that federal RLF funds will be used for the abatement of ACM. The City of Mishawaka plans to demolish the buildings and build affordable residential housing on the site by using city funds. If the asbestos abatement is part of the demolition project, then the entirety may be subject to Section 106 review, regardless of whether the demolition work is funded by other funds or a combination of sources.

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 U.S. 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 U.S. 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 U.S. 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](http://www.achp.gov). If you have questions about archaeological issues please contact Amy Johnson at (317) 232-6982 or [ajohnson@dnr.IN.gov](mailto:ajohnson@dnr.IN.gov). If you have questions about buildings or structures please contact Kami Cai at (317) 233-3883 or [scai@dnr.IN.gov](mailto:scai@dnr.IN.gov). Additionally, in all future correspondence regarding the above indicated project, please refer to DHPA #34164.*

Very truly yours,



Beth K. McCord  
Deputy State Historic Preservation Officer

BKM:KC:ALJ:cws

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