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Via Email: daschleman@noblesville.in.us
City of Noblesville Planning Department
16 S. 10th Street
Noblesville, IN 46060

**RE: Public Comments of the Hoosier Environmental Council on the
Proposed Beaver Gravel Pit and Potter's Bridge Park Expansion, #3 Application
No. 0071-2022, #3A Application No. 0072-2022**

To the City of Noblesville Planning Department,

Please accept these brief public comments on behalf of the Hoosier Environmental Council ("HEC") regarding the request to rezone 51 acres in the 19100 - 19400 block of Allisonville Road ("subject site") to operate a sand and gravel mining operation, submitted by CAB Real Estate, Chris Beaver, and the Hamilton County Parks and Recreation Department. Specifically, HEC respectfully requests that the Noblesville Planning Department deny the request to rezone so that the land can be conserved indefinitely.

HEC's role in protecting the White River

The Hoosier Environmental Council is Indiana's leading educator and advocate for the environment. On that front, HEC is actively involved in the protection of the White River and its tributaries – part of a broader economic initiative that envisions an ecologically healthy river corridor.¹ The White River Vision Plan is a key part of this effort, in which HEC is both a stakeholder and contributor. It is a community-driven plan aimed at guiding development along the White River in Indianapolis and Hamilton County to "establish a national park-like network of places and experiences."²

Over 13,000 people participated in the development of the vision plan, providing valuable input about community priorities for the White River. Indeed, one resident asks: "what are we doing to ensure that there is ecological integrity throughout the development process?"

Communities across Indiana are constantly being burdened by irresponsible development that generates negative environmental outcomes. Local community group Don't Leave It To Beaver has mounted an opposition effort to the proposed sand and gravel mining operation in order to

¹ The [Partners for the White River](#) is a coalition of organizations, funded by the Nina Mason Pulliam Grant, aimed at "conserving and improving the White River and providing opportunities for Hoosiers to once again feel connected to their waterways."

² [White River Vision Plan](https://www.discoverwhiteriver.com/vision-progress/); <https://www.discoverwhiteriver.com/vision-progress/>.

make their environmental concerns heard.³ Over 1,000 people have signed a petition asking the Common Council to “reject the [rezone] request by Beaver Gravel and related parties so the 50-acre lot cannot be mined for sand and gravel, disrupting Potter’s Bridge Park, the nearby residents and neighbors, and the surrounding ecosystem.”⁴

Concerns

Mineral extraction and associated construction are the most significant land-altering forces of the 21st century, contributing heavily to climate change and habitat loss worldwide.⁵ The proposed rezone would allow Beaver Materials to mine aggregate in the floodplain of the White River and then donate the land to the Hamilton County Parks and Recreation Department to expand the existing Potter’s Bridge Park.⁶

Mining aggregate in the floodplain will promote habitat loss and degrade the White River, impacting the existing Potter’s Bridge Park and the surrounding natural areas. The goal of a park expansion does not have to come at the expense of a five-year mining operation. Conserving this parcel, rather than damaging and restoring it, would benefit the Noblesville community by immediately improving aesthetic and scenic quality, protecting endangered and threatened wildlife, reducing costs, and retaining biodiversity. Moreover, Noblesville’s own city policy discourages any impactful development along this segment of the White River. For these reasons, as further detailed below, the rezone request by CAB Real Estate, Chris Beaver, and the Hamilton County Parks and Recreation Department should be denied.

1. Floodplain mining will promote habitat loss.

The subject site is a 51-acre parcel of agricultural land surrounded by roughly 100 acres of natural areas that, together, make up part of a large riparian and migratory corridor for birds and bats.⁷

Agricultural regions are home to a great number of species, with crop land being used as a source of cover and food for wildlife.⁸ Many species living in these regions also rely on other habitats for survival, including forests, floodplains, wetlands, and rivers. This suggests that the wildlife inhabiting Potter’s Bridge Park and the surrounding natural areas interact with and use this crop land for habitat and survival, especially since it has sat undeveloped for at least 70 years.⁹

³ [Don’t Leave It To Beaver Homepage.](#)

⁴ [Stop the Beaver Gravel Pit at Potter’s Bridge Park. Change.org.](#)

⁵ [Sustainability of the global sand system in the Anthropocene, Torres et. al.](#)

⁶ Potter’s Bridge Park is a 66-acre park situated along the White River. It contains the White River Greenway Trail, a 3.25-mile trail traversing along the river’s edge from the park towards downtown Noblesville. Potter’s Bridge is also home to the last remaining covered bridge in Hamilton County, giving it an added historical significance.

⁷ The subject site is bounded by Potter’s Bridge Park to the east, the White River, the White River Greenway, and Blatchley Nature Study Club⁷ to the north, and wooded property owned by the Hamilton County Parks Department to the west.

⁸ [Impacts of Agricultural Production on Wildlife and Biodiversity in the Okanagan Bioregion, Rallings and Mullinix.](#)

⁹ Historical aerial imagery confirms this parcel has been utilized for agricultural purposes since the 1950s.

Endangered, rare, and threatened species that are known or expected to be on the project area or potentially affected by the mining activities include the Indiana bat, Northern Long-eared bat, Monarch butterfly, Bald eagle, Lesser yellowlegs, Red-headed woodpecker, Rusty blackbird, and Wood thrush.¹⁰

Of particular concern is the Indiana bat (*Myotis sodalis*), a federally endangered species protected under the Endangered Species Preservation Act of 1966. Despite being one of the first animals targeted for preservation under the Act, its population remains threatened, largely due to habitat loss. Indeed, a study conducted in Indiana, and specifically in Hendricks, Marion and Morgan Counties, demonstrated that the top two habitats used by the Indiana bat for foraging are woodlands and agricultural fields, and “[their] movements throughout [the] agricultural landscape centered on a riparian corridor.”¹¹

Agricultural fields are often targeted for development because their ability to serve as habitat is overlooked. Allowing Beaver Gravel to mine in habitat suitable to support the federally endangered Indiana bat, as well as other species that call this region home,¹² would contribute to the accelerating global problem of habitat loss.

2. Floodplain mining will degrade the White River.

The open pits that are generated from floodplain mining interact with both surface and groundwater, altering water cycle flows and promoting erosion, sedimentation, and an increased risk of water contamination.¹³ These changes can ripple beyond the immediately affected environment – impairing aquatic and human life upstream and downstream for many miles – increasing the degradation of the White River ecosystem.

The Hamilton County Parks and Recreation Department promotes the Potter’s Bridge Park expansion on their website, stating it will “ecologically [improve] the land through conversion of the property’s existing monoculture into managed green space, capable of supporting a far broader array of wildlife and native vegetation; during and after development.”

Converting the property’s monoculture into a park will indeed ecologically improve the land, but the parks department fails to inform about the sand and gravel mining operation that will take place. While it’s true ecological disturbance can support more robust ecosystems, as in the case of prescribed fire burns, sand and mining operations are not leveraged as a tool in floodplain habitat management and ecosystem recovery. In fact, mining operations often leave land unsuitable for any use other than restoration.

¹⁰ Exhibit 1, USFWS IPaC Resource List.

¹¹ [Foraging Habitat of the Indiana Bat \(*Myotis sodalis*\) at an Urban-Rural Interface, Sparks et. al.](#)

¹² “In the Mississippi Valley, agricultural fields appear to be an important habitat for wintering Rusty Blackbirds, because they provide alternative food sources, such as remnant corn seeds, when aquatic prey and acorns and other nuts are not available. Agricultural fields used by blackbirds are generally near wetlands.” [Rusty blackbird \(*Euphagus carolinus*\): COSEWIC assessment and status report 2017.](#)

¹³ [A Review of the Effect of Floodplain Gravel Mining on River Stability, Ladson and Judd.](#)

Restoration of mining sites is a long-term, costly investment that may never lead to a full recovery of the damaged ecosystem.¹⁴ The vision of this parcel being able to support “a far broader array of wildlife and native vegetation” would be better met by conserving the land, rather than restoring it to a condition it may never achieve.

Conservation would not only maintain the existing biodiversity and habitat, but it would also reduce the associated costs and lead to a more complete ecosystem recovery. For these reasons, HEC advises the Noblesville Planning Commission to acknowledge the environmental impacts of this mining operation and reject the rezone request.

3. Noblesville’s own city policy discourages floodplain mining along this segment of the White River.

The 2020 Noblesville Comprehensive Plan provides detailed planning recommendations for floodplain development within the city of Noblesville. Specifically, the plan outlines three floodplain development corridors: (1) preservation, (2) opportunity, and (3) rural. The subject site is located within the preservation floodplain corridor, “where the greatest opportunity or need for floodplain protection [exists].”¹⁵

Development within the preservation floodplain corridor does not allow for sand and gravel mining – only low-impact parks and associated infrastructure.¹⁶ A park created as a result of habitat loss and river degradation is certainly not low-impact, and Noblesville’s own city policy validates that this area is not suitable for this type of development.

Conclusion

Approval of this rezone request will contribute to habitat loss, causing the reduction in available land for all species, whether endangered or thriving, to forage, seek shelter, and enjoy. Mining is also a major disruptor to ecosystems – generating excessive noise and dust, altering the water cycle, increasing erosion and the potential for water contamination – all of which promote the degradation of the White River ecosystem. Most importantly, Noblesville residents have spoken out against the mining proposal, garnering the support of over 1,000 individuals. For these reasons, HEC respectfully requests that the Noblesville Planning Department seek guidance in the city’s own planning recommendations and reject the rezone request so that this land can be conserved indefinitely.

Sincerely,

Susie McGovern
Senior Water Policy Associate & Legal Assistant
Hoosier Environmental Council

¹⁴ [Sustainability of the global sand system in the Anthropocene, Torres et. al.](#)

¹⁵ Page 62, [2020 Noblesville Comprehensive Plan.](#)

¹⁶ Page 64, [2020 Noblesville Comprehensive Plan.](#)