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Noblesville Preservation Alliance
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To: Ms. Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings Surface Transportation Board
395 E. Street, S.W., Room 1034
Washington, DC 20024

Re: STB Docket No. FD 36137
City of Fishers, City of Noblesville, and Hamilton County, Indiana ("Owners")
Petition for Partial Revocation of Exemption

Dear Ms. Brown:

Enclosed for filing to the above-captioned proceeding are an original and ten copies of written comment regarding the "Petition for Partial Revocation of Exemption" filed on August 1, 2017 with the Surface Transportation Board ("the Board"). A copy of this comment has also been served on the attorney, Robert A. Wimbish, who is representing the collective Owners, of a railroad line in Indiana.

The Noblesville Preservation Alliance would like to provide the following comments relative to the recent petition submitted by the Owners for an exemption that would sever the Nickel Plate Rail and move the severed section into a rail banked arrangement with plans to replace the rail with a trail.

Our comments can be summarized in two key areas:

- process undertaken by the Owners to avoid public input and
- critical value the full rail line brings to Noblesville, IN. and greater Hamilton County, IN.

We would emphasize the need for the Board to exercise its full authority and rights by law to require a full abandonment revocation by the Owners and not allow any partial or expedited revocation as requested by the Owners. We believe their petition intends to cherry pick regulations and stretch case law, favorable only to the Owners' objectives, while continuing to keep the public out of the process. A full proceeding will, at a minimum, create a venue for the community to provide input in a neutral setting, allow all avenues to maintain the full line to be properly explored and have those elements entered into the record as part of the final decision by the Board.

"The Noblesville Preservation Alliance stands for the historic preservation of the community and carries out its mission through community engagement. As a function of our engagement we strive to work in partnership with local entities such as the City of Noblesville, Hamilton County and many other partner organizations. While we've experienced positive engagement working with the city and county on other initiatives we are saddened that the approach with the Nickel Plate Rail does not represent this same spirit of positive engagement. It is clear that the decision making process for the Nickel Plate has been heavily, and at times inappropriately, biased towards a trail only approach. In essence, the city is not listening to the many thousands of citizens, organizations and businesses that represent the great fabric of our city. We believe the most successful projects are those that strike a balance between community input, needs and common sense design. We would encourage and support the city to take an approach that aims to involve citizens and organizations such as the NPA early and throughout the decision making process.

The NPA deeply regrets the city's decision to select a North-only option for the Nickel Plate Rail that destroys so much of this irreplaceable and historically significant treasure. Much of our history has already been lost in this way, and can never be recreated. Noblesville owes its unique character and charm to the preservation of its past successfully commingled with its present. Saving a fragment is certainly better than total loss, but such a decision should only be made when a fragment is all that can be salvaged. That was true of the Old Mill in Noblesville, but is not the case in this situation. Noblesville's historic courthouse is the jewel of Hamilton County. Would it be so majestic if all were destroyed with only the clock tower remaining?" The Nickel Plate Rail's incredible value to the community will be forever lost if the line is permitted to be severed.

The Noblesville Preservation Alliance appreciates the Board's consideration in this matter and looks forward to providing further input as the process moves forward.

Sincerely,

Noblesville Preservation Alliance

A handwritten signature in cursive script, reading "Jeanne M. Clark". The signature is written in dark ink and is positioned above the printed name.

Jeanne Clark, President