

From: [Hughes, Jonathan](#)
To: [Iraheta, Marleny](#); [Whitaker, Nancy G.](#)
Cc: [Mayes, Jonathan L.](#); [Antrim, Jacob T.](#); [Brian Tuohy](#)
Subject: 2023-ZON-109 MDC Appeal Letters for the file.
Date: Friday, March 15, 2024 3:43:17 PM
Attachments: [Councilor Ali Brown Opposition Letter.pdf](#)
[Councilor Crista Carlino Opposition Letter.pdf](#)
[Councilor Dan Boots Opposition Letter.PDF](#)
[Councilor Jared Evans Opposition Letter.pdf](#)
[Councilor Jesse Brown Opposition Letter.pdf](#)
[Councilor John Barth Opposition Letter.pdf](#)
[Councilor Mascari Opposition Letter.pdf](#)
[Councilor Ron Gibson Opposition Letter.pdf](#)
[Rep. Carey Hamilton Opposition Letter.pdf](#)
[Rep. Cherrish Pryor Opposition Letter.pdf](#)
[Rep. Ed DeLaney Opposition Letter.pdf](#)
[Rep. Greg Porter Opposition Letter.pdf](#)
[Pike Township Trustee Annette Johnson Opposition Letter.pdf](#)
[International School Opposition Letter.pdf](#)
[Crooked Creek Land Use Remonstrance.pdf](#)
[Index of Statements in Opposition 3.15.24.pdf](#)
[MSD Pike Township Resolution Opposing.pdf](#)

CAUTION: This email originated from outside of the organization and contains an attachment. Unless you recognize the sender and know the contents are safe, do not open the attachment.

Nancy and Marleny,

Attached please find the following letters which my client, the MSD of Washington Township (Remonstrator) has received/collected concerning 2023-ZON-109. Per prior correspondence, I will not plan to bring written copies of these unless you advise me otherwise. Attached are the following which are all in opposition:

(1) Letters from the following City-County Councilors (in alphabetical order):

- a. Councilor John Barth (District 7)
- b. Councilor Dan Boots (District 3)
- c. Councilor Alison "Ali" Brown (District 10)
- d. Councilor Jesse Brown (District 13)
- e. Councilor Crista Carlino (District 11)
- f. Councilor Jared Evans (District 17)
- g. Councilor Ron Gibson (District 8)
- h. Councilor Frank Mascari (District 19)
- i. Please note that we expect more letters in the coming days and will provide those when they are received.

(2) Letters from the following State Representatives (in alphabetical order):

- a. Representative Ed Delaney
- b. Representative Carey Hamilton
- c. Representative Greg Porter
- d. Representative Cherrish Pryor

- (3) Letter from Pike Township Trustee Annette Johnson
- (4) Letter from the International School
- (5) Letter from Crooked Creek Land Use (I think this may already be in the file)
- (6) At the Hearing Examiner process I submitted two separate pdf packets of letters totaling 430 statements in opposition. I am attaching an index showing a total of 487 statements as we have received an additional 57 statements since the hearing examiner process. I am working on getting those statements into PDF format to send to you, and will forward those along as soon as I have them. As with a prior index I sent, those highlighted in yellow did not provide addresses.
- (7) A resolution from the MSD of Pike Township opposing the rezoning.
- (8) I will also be forwarding an audio file to you for the file (if possible to include) as I'm unsure how I can play that at the hearing. The audio file is being clipped and compressed to ensure I can deliver it to you. I should have it by the end of the day or first thing Monday.

As we receive additional materials, I will forward them on. I wanted to get this to the MDC so they would have time to review the significant material ahead of the hearing. Could you also include in the files this email as an index of what we are providing?

Thanks,

Jon

Jonathan W. Hughes

Bose McKinney & Evans LLP

111 Monument Circle | Suite 2700 | Indianapolis, Indiana 46204
jhughes@boselaw.com | P 317-684-5381 | F 317-223-0381

Assistant Contact | Lisa A. Bood | lbood@boselaw.com | P 317-684-5176 | F 317-223-0176

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**THE COUNCIL
CITY OF INDIANAPOLIS
MARION COUNTY**

Andy Nielsen
Councilor – District 14

Metropolitan Development Commission
200 East Washington Street, 2042
Indianapolis, IN 46204

March 18, 2024

Chair Dillon & Commissioners –

I serve as the City-County Councilor for District 14, and I write in opposition to 2023-ZON-109 filed by Paramount Schools of Excellence, Inc. (petitioner). I ask that the Metropolitan Development Commission (MDC) deny the petitioner's request to rezone property at 5136 Michigan Road.

After hearing extensively from members of the Washington Township Schools and reviewing the current petition materials, I believe that a new school at this location would have an adverse impact on the surrounding community. This is most evident by the severe lack of community engagement and the petitioner's use of Trine University – an authorizer that is not accountable to elected officials in Marion County. I am also concerned with the proposal's insufficient analysis on how saturation of schools in this area will affect traffic controls and impact children's safety when traveling to and from school. Additionally, it remains unclear if the petitioner has received proper clearance and authorization for the use of septic tanks or if the school intends to connect to sewer, leaving a significant public health matter and consideration still in question.

For these reasons, I oppose the rezoning petition and ask that the MDC deny the petitioner's request.

Sincerely,

Andy Nielsen
City-County Councilor – District 14

From: [Delaney, Brienne](#)
To: [Iraheta, Marleny](#); [Whitaker, Nancy G.](#)
Cc: [Perkins, Carlos](#)
Subject: Opposition to Zoning Variance 2023-ZON-109
Date: Tuesday, March 19, 2024 11:06:36 AM

To the members of the Metropolitan Development Commission,

I represent Indianapolis City-County Council District 2, and write in opposition to the petition to rezone the property at 5136 Michigan Road, 2023-ZON-109. I have received many emails, phone calls, and taken numerous meetings from constituents in District 2 who are opposed to this variance.

More specifically, I believe that the proposed zoning is inconsistent with the City's previously approved Comprehensive Plan, and does not resolve substantial traffic safety concerns along Michigan Road.

In conclusion, I support my constituents in their opposition of the rezoning petition. If you have any questions, please contact me at brienne.delaney2@indy.gov.

Sincerely,
Brienne Delaney



Brienne Delaney
City-County Councilor, District 2
City of Indianapolis
200 E Washington St, T441 CCB
Indianapolis, Indiana 46204
Brienne.Delaney2@Indy.gov
O: 317.327.4242/ C: 317.506.3389



**THE COUNCIL
CITY OF INDIANAPOLIS
MARION COUNTY**

CRISTA CARLINO
Councillor, District 11

March 6, 2024

Dear Metropolitan Development Commission –

I represent City-County Council District 11, and I write in opposition to the petition to rezone the property at 5136 Michigan Road, docket number 2023-ZON-109. Washington Township Schools and its community would be adversely impacted by Paramount Schools of Excellence opening a new school at this location as this new, large school is inconsistent with the City's stated Comprehensive Plan, the proposal does not resolve substantial traffic concerns, and the continued oversaturation of schools in Indianapolis is not good for development.

But first I wish to address how Paramount has not been transparent. Rather than follow the customary process of a good charter school by obtaining authorization from the Mayor's Office, Paramount instead obtained authorization from Trine University—175 miles north in Angola, Indiana. And Paramount purports to have held a public hearing in Pike Township, but no one attended, suggesting no one was aware due to lack of notice. Then, after a vigilant neighborhood association initiated a public meeting after members received their re-zoning notices in the mail, Paramount represented that it was working on a traffic study, only to later reveal it was concealing a study that had been completed months prior. Good Indianapolis neighbors and developers do not behave this way.

Paramount's plan is out of line with the City's Comprehensive Plan. The City and its planning department and elected representatives expended resources and taxpayer dollars to evaluate the City's neighborhoods, establish appropriate uses, and create the Comprehensive Plan. Here, Paramount's plan is inconsistent with these uses.

Paramount's use—or at least what Paramount has publicly said—would greatly intensify the use at this location. Instead of a church with limited activity, the site would be transformed to an intense daily use that overlaps with important rush-hour traffic patterns. There are many schools nearby, which have been there for decades. In the end, the City's planning team and elected representatives evaluated the neighborhood and through the



**THE COUNCIL
CITY OF INDIANAPOLIS
MARION COUNTY**

CRISTA CARLINO
Councillor, District 11

Comprehensive Plan said it does not want intense use in this area. That is why the Rural and Estate uses for this area do **not** include schools when other residential areas **do** explicitly state that schools are appropriate. What is more, at least one other charter school has publicly discussed co-locating with Paramount, suggesting that Paramount's public representations are, once again, less than transparent. There are plenty of other sites in the City where Paramount can locate without re-zoning.

The oversaturation of schools in Indianapolis is concerning. Washington Township is already served by a world-class public school, Washington Township Schools, that provides outstanding STEM offerings for all grades of diverse genders, races, ethnicities, and socio-economic history. And nearby are other schools that also provide for their students in stable, proven models. In November 2023, James Betley, the executive director of the Indiana Charter School Board stated that the ICSB no longer authorizes charter schools in Marion County. "It's too crowded. It's oversaturated. There are too many schools." In 2019, Tindley Academy closed its single-gender STEM-focused charter school after poor enrollment—and that was *before* the ICSB declared oversaturation within the City. This oversaturation creates enhanced risk of closure, which then creates an abandoned building and neighborhood blight. That is not what this neighborhood needs.

Moreover, Paramount's traffic study that it sought to hide raises significant safety concerns. The proposed changes by DPW warrant further review because it's unclear if the sidewalks need to be moved to accommodate the change. Paramount publicly said that it has enough drive on its property to queue the cars, but that's not what Paramount's own traffic engineer said. In fact, the traffic engineer Paramount retained said significant drive way would needed to be added to provide sufficient queue for the cars dropping students off. Paramount then shopped around for a second opinion, and retained a new engineer. The second traffic engineer provided not a full study but a simple short review based upon incomplete information, especially when compared with the comprehensive first study. Simply put, Paramount's hastily drawn up plan intensifies use at the property without addressing significant safety issues visited upon its own families and those traveling in snarled traffic on Michigan Road.



**THE COUNCIL
CITY OF INDIANAPOLIS
MARION COUNTY**

CRISTA CARLINO
Councillor, District 11

In conclusion, oversaturation of this area out of alignment with the Comprehensive Plan that raises serious traffic safety concerns while enhancing risk that the charter school will close, leaving an abandoned building, is not what is needed here.

I, therefore, oppose the rezoning petition filed by Paramount Schools of Excellence, Inc., 2023-ZON-109. If you have any questions, please contact me at Crista.Carlino@indy.gov.

Sincerely,

City-County Councilor
District 11



**THE COUNCIL
CITY OF INDIANAPOLIS
MARION COUNTY**

Daniel L. Boots
Councillor - District 3

February 28, 2024

Department of Metropolitan Development
Attn: Board of Zoning Appeals
200 East Washington Street, Suite 1842
Indianapolis, Indiana 46204

Re: Zoning Petition 2023-ZON-109 – 5136 Michigan Road

To the Members of the Board of Zoning Appeals:

I represent City-County Council District 3, which includes portions of the Metropolitan School District of Washington Township (MSDWT) (“Washington Township Schools”). The parcel that is the subject of the above petition lies within MSDWT. Washington Township Schools and its community would be heavily, and adversely, impacted by Paramount Schools of Excellence opening a new school at 5136 Michigan Road as this new, large school is unnecessary, inconsistent with the City’s stated comprehensive plan, generates significant traffic issues, is unwanted by the local community, and is out of compliance with environmental standards.

A point that has truly concerned me in this matter has been Paramount’s lack of transparency in its preparations surrounding this rezoning effort. Throughout this entire process, Paramount has avoided public engagement and concealed its efforts. Paramount was not authorized by the Mayor’s Office, as was done with their other schools located within the City, but instead obtained authorization from Trine University—175 miles north in Angola, Indiana. Upon securing a charter from Trine, Paramount then purportedly held a “public” hearing in Pike Township – *not* Washington Township. Not surprisingly, not one member of the public attended that gathering, which suggests no one was aware of Paramount’s ultimate intentions. It wasn’t until after local residents raised concerns following their receipt of the mandatory re-zoning notices, did Paramount reluctantly attend a true neighborhood public meeting held on January 3, 2024, initiated and planned by the Highland Kessler Civic League (HKCL). (Such public meetings are commonly held *before* a rezoning petition is filed in situations like this if a petitioner is truly seeking to be a good neighbor in the community.)

Another instance of their lack of transparency is that at that January 3rd public meeting, which I personally attended, Paramount representatives stated that their traffic study was “in process” and should be completed before January 15, 2024. To our dismay, we later learned their initial traffic study was actually completed *well before that in November 2023*. Still to that January date, Paramount had failed to submit that traffic study to the City’s planning department, nor had Paramount alerted prospective parents, neighbors, or the City that it intended to open a school serviced by a septic tank and not connected to sanitary sewer, *contrary to public health standards*. Now, other charter schools have openly discussed at public meetings potentially co-locating with Paramount, something that

Paramount has never formally disclosed to my knowledge. Paramount's lack of transparency and failure to disclose important information throughout this process raises serious concerns about this entire project and their ultimate intentions here.

Second, Paramount's plan also fails to comply with the City's Comprehensive Plan (the "Plan"). The City and its talented planning department and elected representatives have spent countless hours and taxpayer dollars to evaluate the City's neighborhoods, establish appropriate uses, and create the Plan for the entirety of Indianapolis. Here, Paramount's plan is inconsistent with those recommended uses.

Paramount's use—or at least what Paramount has publicly disclosed—would greatly intensify the use at this location inconsistent with the Plan. Instead of a church with limited activity, the site would be transformed to an intense daily use with considerable overlap with critical rush-hour traffic patterns. Adding to that intensity is the fact that there are numerous other schools already in the immediate area, including Crooked Creek Elementary School (less than 1 mile), International School of Indiana (less than 1 mile away), St. Monica School (approx. 1.5 miles away), The Children's House (approx. 1.5 miles away), not to mention Fox Hill Elementary, New Augusta Public Academy, Guion Creek Elementary and Middle School, and The Orchard School, each of which are about 3 miles away.

This saturation of schools in this area—many of which have been there for decades—is precisely why the Plan does not allow a large school (10 acres or more) like Paramount's to be present in this area, and why the preferred use is rural or estate (or religious use). Ultimately, the City's planning team and elected representatives evaluated the neighborhood and, through the Comprehensive Plan, deemed that it did not want such an intense use in that area along four-lane Michigan Road. Adding to that detrimental intensity is the fact that now at least one other charter school (Purdue Polytechnic) has publicly discussed co-locating with Paramount, suggesting that Paramount's public representations are, once again, less than fully transparent. There are numerous sites around the City where Paramount could locate without having to re-zone the relevant parcel(s).

The oversaturation of schools in Indianapolis is a real issue, and is not to be taken lightly. Washington Township is already served by a world-class public school district, Washington Township Schools, that provides outstanding STEM offerings *for all grades* of diverse genders, races, ethnicities, and socio-economic history. A charter school like Paramount is simply not needed in Washington Township as its female and/or black students already perform above Marion County and State averages. (See **Exhibit A**).¹ This oversaturation creates an enhanced risk of closure, which then creates an abandoned building, families often left with nowhere to send their kids to school timely, and neighborhood blight. That is not what this neighborhood needs (or wants).²

Third, Paramount's concealed traffic study raises significant safety concerns. Paramount never intended to relay its initial traffic study to City staff, and when it did, DPW required significant

¹ Indeed, in November 2023, James Betley, the Executive Director of the Indiana Charter School Board (ICSB), stated that the ICSB no longer authorizes charter schools in Marion County. In his words, "It's too crowded. It's oversaturated. There are too many schools." In 2019, Tindley Academy closed its single-gender STEM-focused charter school after poor enrollment—and that was *before* the ICSB declared oversaturation within the City.

² The opposition against this re-zoning to accommodate another Paramount School in Marion County (in Washington Township specifically) is extensive. Community organizations in opposition include the Highland Kessler Civic League, Indianapolis Education Justice Coalition, MSDWT, Pike Parent Network, Washington Township Parent Council Network, and Washington Township Parents in Support of Public Education. See **Exhibit B**.

infrastructure changes. The changes proposed by DPW warrant further review, however, because it is unclear if nearby sidewalks need to be moved to accommodate the infrastructure changes. More particularly, Paramount has stated publicly that it has enough linear drive on its property to queue the multitude of cars dropping off and picking up kids before and after school, but that's not what Paramount's own traffic engineer concluded. In fact, the traffic engineer Paramount *initially* retained said significant driveway would need to be added to the property in order to provide sufficient queue for the cars dropping students off. Paramount apparently did not like that advice and shopped around for a second opinion, and thereafter retained a new traffic engineer, who ultimately provided not a full study, but rather a simple short review. The second traffic study, however, *had a fatal error* - it assumed Paramount would offer bus transportation like other true public schools. This is simply not the case - at the HKCL January 3rd meeting I attended Paramount admitted it will not be offering any transportation whatsoever. Again, Paramount's hastily drawn-up plan intensifies use at the property without addressing significant safety issues visited upon its own families and those traveling in snarled traffic along Michigan Road, especially during morning and afternoon rush hour.

Finally, Paramount again has not told the whole story by failing to address why it believes it's safe to put kids in a school with a septic tank system and not sanitary sewers. Indiana health standards currently require specific parameters for commercial septic systems, *and even more specific standards for commercial systems for schools*. Paramount has not presented any information that its septic system can accommodate the additional load. There is a sanitary sewer line within 300 feet of the church structure, but Paramount has not indicated it will connect to that sewer. My understanding is that all the other nearby schools are indeed connected to sewer. Paramount does not appear to have obtained any clearance or authorization to be exempted from this important public health requirement, especially since it has stated its intent to engage in agricultural activities on the property, including planting crops and caring for livestock.

All things considered, oversaturation of this area is out of alignment with the Comprehensive Plan and raises serious traffic safety and public health concerns, while enhancing the risk that the charter school will eventually close, which many of them do, leaving yet another abandoned building, is not what is in the best interest of this community.

For at least the above reasons, I oppose the rezoning petition filed by Paramount Schools of Excellence. Should you have any questions, please contact me at Dan.Boots@Indy.gov or 317-327-4242. Thank you.

Your truly,



Daniel L. Boots
City-County Councilor
District 3

EXHIBIT A

STEM PROGRAMMING

WASHINGTON TOWNSHIP SCHOOLS



ELEMENTARY LEVEL

STEM-based instruction occurs DAILY in our elementary classrooms, and all students engage in a weekly exploratory arts rotation focused on technology.

MIDDLE LEVEL

WTS middle schools offer Project Lead the Way courses, including Design and Modeling, Automation and Robotics, App Creator, and Medical Detectives. Students can take math and science courses for high school credit. Extra/co-curricular opportunities, including robotics club are also available.



HIGH SCHOOL

WTS high school students are offered a wide variety of STEM opportunities, including a core curriculum rich in STEM content, Project Lead the Way courses, college and career-based courses, and extra/co-curricular opportunities, including robotics club and esports.



All of our WTS STEM course offerings and diverse learning experiences occur in beautifully redesigned and renovated spaces, thanks to the support of our community!



EQUITABLE • AFFIRMING • RESPONSIVE

Washington Township Schools Achievement Snapshot

- ★ **WT Females** outperformed WT Males on recent state-standardized science assessments
- ★ Of the **top 100 graduating seniors** from 2023, 64 of the students were female
- ★ **WTS Black students** outperformed the state average by nearly 12 percent and the charter average by nearly 20 percent last year on IREAD
- ★ **WTS Black students** outperformed the state average and charter average in both SATs last year and were the highest performing out of 10 other school districts of similar size and demographics
- ★ **WTS had the best pandemic academic recovery** on IREAD in Marion County

EXHIBIT B

Why Do Our Communities Oppose a New Paramount Charter School?



▶ LACK OF ENGAGEMENT

- We are **disappointed** in Girl Scouts of Central Indiana for not reaching out to Washington Township district leadership to better understand our existing wealth of STEM curriculum available to all our students.
- We are **disheartened** that Girl Scouts of Central Indiana, who has been a "partner" with our schools for so many years, is now **choosing to compete** with our schools to get students and funding.

▶ TRANSPARENCY ISSUES

- Frustration and challenges with transparency and the **lack of outreach**.
- Informed through a rezoning notice, there was **no good faith public hearing for the authorization of charter itself**.
- **Lack of openness** to public.
- The authorizer is located **three hours away** from our community and making decisions for us with **no knowledge about our needs**.

▶ OVERSATURATION

- We spend a lot of time and money on too many schools that **exhaust the "system."** Even the Indiana Charter School Board's executive director recently said, "We're not authorizing in Indianapolis anymore...It's too crowded. It's oversaturated. There are too many schools."
- **Exacerbates the teacher shortage** and pipeline problems. How is this part of a solution to the teacher pipeline issues we face? There are vacancies throughout every district in Marion county. The solution is not opening more schools and creating more inefficiencies and redundancies.
- **Causes student transiency and instability**, which hurts students. It's not good for kids to be moving schools, and having to adjust repeatedly to different curriculum, rules and classmates. It's better for children to have continuity and stability.
- The more students change schools, the more it impacts our school communities and makes it more likely that we are going to be receiving students **requiring far more**

▶ SINGLE GENDER MODEL

- **Failed model.** Tindley tried this years ago and has already closed and consolidated. A major concern for that closure was they didn't feel like those kids were making a good transition to a coed high school.
- It's **not innovative**. This has been tried, and it didn't work. It didn't prove to close an achievement gap.
- It's **not inclusive** and inherently excludes half the population.

▶ FRAGMENTED AND STRAINED RESOURCES

- Concerned about funding. Losing up to 300 students boils down to a potential **loss of nearly \$3 million annually**. This directly impacts our resources, as we continue to grow a student enrollment that has more complex needs, particularly the needs of our English Language Learners.
- Funding is critical to our ability to continue to offer the supports our students need. This **harms our ability to keep offering high quality programs** while the number of students we serve grows.

▶ REZONING CONCERNS

- **Traffic study lack of transparency.** Paramount's own traffic study was kept quiet. Their own study noted serious concerns with one lane in and one lane out at the property.
- Paramount's traffic study calls for 1) within the property, two lanes out, 2) a southbound right turn in lane off of Michigan Rd., 3) a northbound exit lane off of Michigan Rd. and 4) more cueing space for cars to line up at drop off and pick up. **None of these recommendations are in their plan.** Both (2) and (3) would **require acquisition of additional property** from nearby landowners/residents.
- The campus is operating under a **septic tank and not tied into the sewer system**. This is very alarming with the proposed STEM outdoor activities and raises red flags for health and safety of students, employees and neighboring residents.



**THE COUNCIL
CITY OF INDIANAPOLIS
MARION COUNTY**

JARED EVANS
Councilor, District 17

March 13, 2024

Dear Metropolitan Development Commission –

I represent City-County Council District 17, and I write in opposition to the petition to rezone the property at 5136 Michigan Road, docket number 2023-ZON-109. Washington Township Schools and its community would be adversely impacted by Paramount Schools of Excellence opening a new school at this location as this new, large school is inconsistent with the City's stated Comprehensive Plan, the proposal does not resolve substantial traffic concerns, and the continued oversaturation of schools in Indianapolis is not good for development.

But first I wish to address how Paramount has not been transparent. Rather than follow the customary process of a good charter school by obtaining authorization from the Mayor's Office, Paramount instead obtained authorization from Trine University—175 miles north in Angola, Indiana. And Paramount purports to have held a public hearing in Pike Township, but no one attended, suggesting no one was aware due to lack of notice. Then, after a vigilant neighborhood association initiated a public meeting after members received their re-zoning notices in the mail, Paramount represented that it was working on a traffic study, only to later reveal it was concealing a study that had been completed months prior. Good Indianapolis neighbors and developers do not behave this way.

Paramount's plan is out of line with the City's Comprehensive Plan. The City and its planning department and elected representatives expended resources and taxpayer dollars to evaluate the City's neighborhoods, establish appropriate uses, and create the Comprehensive Plan. Here, Paramount's plan is inconsistent with these uses.

Paramount's use—or at least what Paramount has publicly said—would greatly intensify the use at this location. Instead of a church with limited activity, the site would be transformed to an intense daily use that overlaps with important rush-hour traffic patterns. There are many schools nearby, which have been there for decades. In the end, the City's planning team and elected representatives evaluated the neighborhood and through the Comprehensive Plan said it does not want intense use in this area. That is why the Rural and Estate uses for this area do **not** include schools when other residential areas **do** explicitly state that schools are appropriate. What is more, at least one other charter school has publicly discussed co-locating with Paramount, suggesting that Paramount's public representations are, once again, less than transparent. There are plenty of other sites in the City where Paramount can locate without re-zoning.

The oversaturation of schools in Indianapolis is concerning. Washington Township is already served by a world-class public school, Washington Township Schools, that provides outstanding STEM offerings for all grades of diverse genders, races, ethnicities, and socio-economic history. And nearby are other schools that also provide for their students in stable, proven models. In November 2023, James Betley, the executive director of the Indiana Charter School Board stated that the ICSB no longer authorizes charter schools in Marion County. “It’s too crowded. It’s oversaturated. There are too many schools.” In 2019, Tindley Academy closed its single-gender STEM-focused charter school after poor enrollment—and that was *before* the ICSB declared oversaturation within the City. This oversaturation creates enhanced risk of closure, which then creates an abandoned building and neighborhood blight. That is not what this neighborhood needs.

Moreover, Paramount’s traffic study that it sought to hide raises significant safety concerns. The proposed changes by DPW warrant further review because it’s unclear if the sidewalks need to be moved to accommodate the change. Paramount publicly said that it has enough drive on its property to queue the cars, but that’s not what Paramount’s own traffic engineer said. In fact, the traffic engineer Paramount retained said significant driveway would needed to be added to provide sufficient queue for the cars dropping students off. Paramount then shopped around for a second opinion and retained a new engineer. The second traffic engineer provided not a full study, but a simple short review based upon incomplete information, especially when compared with the comprehensive first study. Simply put, Paramount’s hastily drawn up plan intensifies use at the property without addressing significant safety issues visited upon its own families and those traveling in snarled traffic on Michigan Road.

In conclusion, oversaturation of this area out of alignment with the Comprehensive Plan that raises serious traffic safety concerns while enhancing risk that the charter school will close, leaving an abandoned building, is not what is needed here.

I, therefore, oppose the rezoning petition filed by Paramount Schools of Excellence, Inc., 2023-ZON-109. If you have any questions, please contact me at Jared.evans@indy.gov.

Sincerely,



Jared Evans
City-County Councilor
District 17



March 4, 2024

Department of Metropolitan Development
Attn: Metropolitan Development Commission
200 E. Washington Street, Suite 1842
Indianapolis, IN 46204

RE: Zoning Petition 2023-ZON-109 – 5136 Michigan Road

To the Metropolitan Development Commission:

Good afternoon. My name is Jesse Brown and I am the City County Councilor for District 13, the near East side of Indianapolis. I'm speaking today because I have firsthand experience relevant to this hearing.

Behind me today we see a large number of people who are very passionate, on both sides of the aisle. Though there are very real issues with zoning and land use, these issues are made much more vitriolic and emotional because of the elephant in the room:

Charter schools.

I wanted to share my firsthand experience: I taught at a charter high school for three and a half years. While I was there, for the first three years, I would have been a person insisting that charter schools perform a valuable and necessary role in the education landscape. My peers were hard working, we all loved our students, and we worked extremely hard to teach our students.

But then one day, we educators were summoned to a mandatory all-staff meeting. At that meeting, we heard a few updates.

Our first update was that our healthcare benefits were going to almost double in cost year over year. We were told that as teachers, we were the ones responsible for this because we visited the doctor too often.

2023-ZON-109

Cell: 317-370-7079
Email: jesse@jesseforindy.com

JESSE BROWN

FOR CITY COUNCIL
INDIANAPOLIS DISTRICT 13

The second update was that we were moving to a year round school model and adding 38 days of staff work days to our calendar. That worked out to 18 percent more work every year, and we were offered an 8 percent raise in our annual salaries.

For those in the audience who are laymen and not professional educators, I can do the math for you and tell you that's known as a pay cut.

So from that moment onward, I came to believe that for the health, welfare, and dignity of educators and support staff, a union is an absolute requirement for our schools.

However, I don't accept any framing that insinuates that workers' rights are in conflict with what is best for students.

Later that same year, my school's administrators unilaterally and against teachers' desires chose to stop the most effective and useful portions of the charter's model. We replaced two full days of internships in the community with ineffective test prep. Student attendance and morale immediately plummeted. For what it's worth, the administrator who delivered these truly infuriating messages now works in a high position at Purdue Polytechnic.

The fact of the matter is that charter schools, even when they are performing well as Paramount tends to, are a much higher risk than public schools. They're a higher risk for students, for teachers, and for neighborhoods.

My point today is not that charter schools should require different standards in front of this hearing than any other organization. It's to provide context around the raised emotions on both sides of this issue.

My constant insistence on any contentious matters like the one in front of us today is that pushing through a rezoning or variance at the MDC or BZA is not the appropriate way to handle them. When we have such a large turnout in the middle of a workday, that is a sign that further conversations are necessary and a warning that the city should not yet be taking sides.

The leaders at Paramount may or may not have fulfilled the legal notice and public hearing requirements that constitute the minimum amount of community engagement required. But I think anyone can look around this room and see that

JESSE BROWN

FOR CITY COUNCIL
INDIANAPOLIS DISTRICT 13

moving forward with any changes will lead to large numbers of people feeling very frustrated.

The debate over charter schools is an intense one. Many charters have failed, causing damage to students and their communities. Teachers have a very real and intense concern that their livelihoods are threatened by the charter model.

Paramount did not create this situation, but they should certainly be aware of it and act accordingly.

In my district, Paramount operates several schools, and the organization has a good reputation. They have built trust with neighbors and found a way forward. So I know it's possible. But it has not yet happened for this new proposed school.

Moving forward with any rezoning today would be a grave mistake. It would deepen the community's belief that Paramount is attempting to compete with Washington Township schools and destroy the teacher's union. It would send a message to less savory charter operators that communities surrounding charter schools have no rights and will be trampled.

This is a time for conversation, understanding each other, and trying to find compromise. It's absolutely the wrong time for the city to grant the appearance of putting our thumb on the scale.

As such I urge you to reject the rezoning being requested today.

Sincerely,

Jesse Brown
City-County Council, District 13





**THE COUNCIL
CITY OF INDIANAPOLIS
MARION COUNTY**

JOHN BARTH
Councilor, District 7

March 14, 2024

Dear Metropolitan Development Commission –

I represent City-County Council District 7, and I write in opposition to the petition to rezone the property at 5136 Michigan Road, docket number 2023-ZON-109. Washington Township Schools and its community would be adversely impacted by opening a new school at this location as this new, large school is inconsistent with the City's stated Comprehensive Plan, the proposal does not resolve substantial traffic concerns, and the continued oversaturation of schools in Indianapolis is of concern. I am also concerned with the process charter school authorizers use in general and want to ensure that there is robust community engagement long before any decision to authorize a new school in Indianapolis.

I, therefore, oppose the rezoning petition filed by Paramount Schools of Excellence, Inc., 2023-ZON-109. If you have any questions, please contact me at john.barth@indy.gov.

Sincerely,

John Barth
City-County Councilor
District 7



**THE COUNCIL
CITY OF INDIANAPOLIS
MARION COUNTY**

KRISTIN JONES
Councilor, District 18

March 17, 2024

Dear Metropolitan Development Commission :

I represent City-County Council District 18, and I write in opposition to the petition to rezone the property at 5136 Michigan Road, docket number 2023-ZON-109. Washington Township Schools and its community would be adversely impacted by Paramount Schools of Excellence opening a new school at this location as this new, large school is inconsistent with the City's stated Comprehensive Plan, the proposal does not resolve substantial traffic concerns, and the continued oversaturation of schools in Indianapolis is not good for development.

But first I wish to address how Paramount has not been transparent. Rather than follow the customary process of a good charter school by obtaining authorization from the Mayor's Office, Paramount instead obtained authorization from Trine University—175 miles north in Angola, Indiana. And Paramount purports to have held a public hearing in Pike Township, but no one attended, suggesting no one was aware due to lack of notice. Then, after a vigilant neighborhood association initiated a public meeting after members received their rezoning notices in the mail, Paramount represented that it was working on a traffic study, only to later reveal it was concealing a study that had been completed months prior. Good Indianapolis neighbors and developers do not behave this way.

Paramount's plan is out of line with the City's Comprehensive Plan. The City and its planning department and elected representatives expended resources and taxpayer dollars to evaluate the City's neighborhoods, establish appropriate uses, and create the Comprehensive Plan. Here, Paramount's plan is inconsistent with these uses.

Paramount's use—or at least what Paramount has publicly said—would greatly intensify the use at this location. Instead of a church with limited activity, the site would be transformed to an intense daily use that overlaps with important rush-hour traffic patterns. There are many schools nearby, which have been there for decades. In the end, the City's planning team and elected representatives evaluated the neighborhood and through the Comprehensive Plan said it does not want intense use in this area. That is why the Rural and Estate uses for this area do **not** include schools when other residential areas **do** explicitly state that schools are appropriate. What is more, at least one other charter school has publicly discussed co-locating with Paramount, suggesting that Paramount's public representations are, once again, less than transparent. There are plenty of other sites in the City where Paramount can locate without re-zoning.



**THE COUNCIL
CITY OF INDIANAPOLIS
MARION COUNTY**

KRISTIN JONES
Councilor, District 18

The oversaturation of schools in Indianapolis is concerning. Washington Township is already served by a world-class public school, Washington Township Schools, that provides outstanding STEM offerings for all grades of diverse genders, races, ethnicities, and socio-economic history. And nearby are other schools that also provide for their students in stable, proven models. In November 2023, James Betley, the executive director of the Indiana Charter School Board stated that the ICSB no longer authorizes charter schools in Marion County. "It's too crowded. It's oversaturated. There are too many schools." In 2019, Tindley Academy closed its single-gender STEM-focused charter school after poor enrollment—and that was *before* the ICSB declared oversaturation within the City. This oversaturation creates enhanced risk of closure, which then creates an abandoned building and neighborhood blight. That is not what this neighborhood needs.

Moreover, Paramount's traffic study that it sought to hide raises significant safety concerns. The proposed changes by DPW warrant further review because it's unclear if the sidewalks need to be moved to accommodate the change. Paramount publicly said that it has enough drive on its property to queue the cars, but that's not what Paramount's own traffic engineer said. In fact, the traffic engineer Paramount retained said significant drive way would needed to be added to provide sufficient queue for the cars dropping students off. Paramount then shopped around for a second opinion, and retained a new engineer. The second traffic engineer provided not a full study but a simple short review based upon incomplete information, especially when compared with the comprehensive first study. Simply put, Paramount's hastily drawn up plan intensifies use at the property without addressing significant safety issues visited upon its own families and those traveling in snarled traffic on Michigan Road.

In conclusion, oversaturation of this area out of alignment with the Comprehensive Plan that raises serious traffic safety concerns while enhancing risk that the charter school will close, leaving an abandoned building, is not what is needed here.

I, therefore, oppose the rezoning petition filed by Paramount Schools of Excellence, Inc., 2023-ZON-109. If you have any questions, please contact me at 317-680-6869.

Sincerely,

Kristin Jones
Indianapolis City-County Councilor
District 18



**THE COUNCIL
CITY OF INDIANAPOLIS
MARION COUNTY**

FRANK MASCARI
Councillor, District 21

March 7, 2024

Dear Metropolitan Development Commission –

I represent City-County Council District 19, and I write in opposition to the petition to rezone the property at 5136 Michigan Road, docket number 2023-ZON-109. Washington Township Schools and its community would be adversely impacted by Paramount Schools of Excellence opening a new school at this location as this new, large school is inconsistent with the City's stated Comprehensive Plan, the proposal does not resolve substantial traffic concerns, and the continued oversaturation of schools in Indianapolis is not good for development.

But first I wish to address how Paramount has not been transparent. Rather than follow the customary process of a good charter school by obtaining authorization from the Mayor's Office, Paramount instead obtained authorization from Trine University—175 miles north in Angola, Indiana. And Paramount purports to have held a public hearing in Pike Township, but no one attended, suggesting no one was aware due to lack of notice. Then, after a vigilant neighborhood association initiated a public meeting after members received their re-zoning notices in the mail, Paramount represented that it was working on a traffic study, only to later reveal it was concealing a study that had been completed months prior. Good Indianapolis neighbors and developers do not behave this way.

Paramount's plan is out of line with the City's Comprehensive Plan. The City and its planning department and elected representatives expended resources and taxpayer dollars to evaluate the City's neighborhoods, establish appropriate uses, and create the Comprehensive Plan. Here, Paramount's plan is inconsistent with these uses.

Paramount's use—or at least what Paramount has publicly said—would greatly intensify the use at this location. Instead of a church with limited activity, the site would be transformed to an intense daily use that overlaps with important rush-hour traffic patterns. There are many schools nearby, which have been there for decades. In the end, the City's planning team and elected representatives

200 E. Washington St. Room T-241 • Indianapolis, IN 46204

Phone: 317.788.0520 • Fax: 317.327.4230

Frank.Mascari@indy.gov



**THE COUNCIL
CITY OF INDIANAPOLIS
MARION COUNTY**

FRANK MASCARI
Councillor, District 21

evaluated the neighborhood and through the Comprehensive Plan said it does not want intense use in this area. That is why the Rural and Estate uses for this area do not include schools when other residential areas do explicitly state that schools are appropriate. What is more, at least one other charter school has publicly discussed co-locating with Paramount, suggesting that Paramount's public representations are, once again, less than transparent. There are plenty of other sites in the City where Paramount can locate without re-zoning.

The oversaturation of schools in Indianapolis is concerning. Washington Township is already served by a world-class public school, Washington Township Schools, that provides outstanding STEM offerings for all grades of diverse genders, races, ethnicities, and socio-economic history. And nearby are other schools that also provide for their students in stable, proven models. In November 2023, James Betley, the executive director of the Indiana Charter School Board stated that the ICSB no longer authorizes charter schools in Marion County. "It's too crowded. It's oversaturated. There are too many schools." In 2019, Tindley Academy closed its single-gender STEM-focused charter school after poor enrollment—and that was *before* the ICSB declared oversaturation within the City. This oversaturation creates enhanced risk of closure, which then creates an abandoned building and neighborhood blight. That is not what this neighborhood needs.

Moreover, Paramount's traffic study that it sought to hide raises significant safety concerns. The proposed changes by DPW warrant further review because it's unclear if the sidewalks need to be moved to accommodate the change. Paramount publicly said that it has enough drive on its property to queue the cars, but that's not what Paramount's own traffic engineer said. In fact, the traffic engineer Paramount retained said significant drive way would needed to be added to provide sufficient queue for the cars dropping students off. Paramount then shopped around for a second opinion, and retained a new engineer. The second traffic engineer provided not a full study but a simple short review based upon incomplete information, especially when compared with the comprehensive first study. Simply put, Paramount's hastily drawn up plan intensifies use at the property without addressing significant safety issues visited upon its own families and those traveling in snarled traffic on Michigan Road.

In conclusion, oversaturation of this area out of alignment with the Comprehensive Plan that raises serious traffic safety concerns while enhancing



**THE COUNCIL
CITY OF INDIANAPOLIS
MARION COUNTY**

FRANK MASCARI
Councillor, District 21

risk that the charter school will close, leaving an abandoned building, is not what is needed here.

I, therefore, oppose the rezoning petition filed by Paramount Schools of Excellence, Inc., 2023-ZON-109. If you have any questions, please contact me at frank.mascari@indy.gov or 317-788-0520.

Sincerely,

A handwritten signature in black ink, appearing to read "Frank Mascari".

Frank Mascari
City-County Councilor
District 19



**THE COUNCIL
CITY OF INDIANAPOLIS
MARION COUNTY**

NICK ROBERTS
Councilor, District 4

March 14, 2024

Metropolitan Development Commission
200 East Washington Street
Indianapolis, Indiana 4620

Dear Members of the Metropolitan Development Commission:

I write to express my formal remonstrance against Petition Number 2023-ZON-109 (5136 Michigan Road), the subject property of which is within my City-County Council District 4. The local community and school district would be adversely impacted by Paramount Schools of Excellence opening a new school at this location. The proposed school is inconsistent with the City's Comprehensive Plan, does not adequately address substantial traffic concerns, and continues oversaturation of schools in Indianapolis.

First, I wish to address Paramount's community engagement. Instead of obtaining authorization through the Mayor's Office, as is customary, Paramount obtained authorization from Trine University—175 miles north in Angola, Indiana. Paramount states they held a public hearing in Pike Township, but no one attended, raising questions about the notice given to the community. At a subsequent community meeting organized by a neighborhood association, Paramount represented they were working on a traffic study, only to later reveal the study had been completed months prior. Finally, I am under the impression there were multiple traffic studies presented by Paramount, one of which seems to be only a review. I am concerned about the traffic queue at a school off Michigan Road, especially in an age where traffic safety is of utmost importance to Indianapolis.

Paramount's proposed plan is out of line with the City's Comprehensive Plan. The City expended resources to evaluate the City's neighborhoods, establish appropriate uses, and create the Comprehensive Plan. Therefore, the Comprehensive Plan should be regarded as a guide for approving projects like this one. The proposed use would increase the area's density. The current, limited Church traffic would be subjected to daily school traffic. There are many schools nearby, which have been there for decades. The Comprehensive Plan advises against dense use. Rural and Estate uses for this area do not include schools, while other residential areas do. Moreover, at least one other charter school has publicly discussed co-locating with Paramount, suggesting there may be plans for further expansion in the near future. There are many sites in the City that are zoned for such use, in areas where it would be more appropriate.

Washington Township is already served by world-class public school system, Washington Township Schools. Other nearby schools also provide for their students in stable, proven models. In November 2023, the Indiana Charter School Board (ICSB)



**THE COUNCIL
CITY OF INDIANAPOLIS
MARION COUNTY**

NICK ROBERTS
Councilor, District 4

indicated they will no longer authorize charter schools in Marion County due to oversaturation. This oversaturation creates enhanced risk of closure, which then creates an abandoned building and neighborhood blight. Such a situation would be counter to the goals of the neighborhood.

In conclusion, please allow this letter to serve as my official remonstrance against Petition Number 2023-ZON-109. Please contact me with any questions.

Thank you for your consideration. Respectfully,

Councilor Nick Roberts
Councilor, District 4



**THE COUNCIL
CITY OF INDIANAPOLIS
MARION COUNTY**

Ron Gibson
Councilman, District 8

March 13, 2024

Dear Metropolitan Development Commission –

I represent City-County Council District 8, and I write in opposition to the petition to rezone the property at 5136 Michigan Road, docket number 2023-ZON-109. Washington Township Schools and its community would be adversely impacted by Paramount Schools of Excellence opening a new school at this location as this new, large school is inconsistent with the City's stated Comprehensive Plan, the proposal does not resolve substantial traffic concerns, and the continued oversaturation of schools in Indianapolis is not good for development.

But first I wish to address how Paramount has not been transparent. Rather than follow the customary process of a good charter school by obtaining authorization from the Mayor's Office, Paramount instead obtained authorization from Trine University—175 miles north in Angola, Indiana. And Paramount purports to have held a public hearing in Pike Township, but no one attended, suggesting no one was aware due to lack of notice. Then, after a vigilant neighborhood association initiated a public meeting after members received their rezoning notices in the mail, Paramount represented that it was working on a traffic study, only to later reveal it was concealing a study that had been completed months prior. Good Indianapolis neighbors and developers do not behave this way.

Paramount's plan is out of line with the City's Comprehensive Plan. The City and its planning department and elected representatives expended resources and taxpayer dollars to evaluate the City's neighborhoods, establish appropriate uses, and create the Comprehensive Plan. Here, Paramount's plan is inconsistent with these uses.

Paramount's use—or at least what Paramount has publicly said—would greatly intensify the use at this location. Instead of a church with limited activity, the site would be transformed to an intense daily use that overlaps with important rush-hour traffic patterns. There are many schools nearby, which have been there for decades. In the end, the City's planning team and elected representatives evaluated the neighborhood and through the Comprehensive Plan said it **does not** want intense use in this area. That is why the Rural and Estate uses for this area do **not** include schools when other residential areas **do** explicitly state that schools are appropriate. What is more, at least one other charter school has publicly discussed co-locating with Paramount, suggesting that Paramount's public representations are, once again, less than transparent. There are plenty of other sites in the City where Paramount can locate without re-zoning.



**THE COUNCIL
CITY OF INDIANAPOLIS
MARION COUNTY**

Ron Gibson
Councilman, District 8

The oversaturation of schools in Indianapolis is concerning. Washington Township is already served by a world-class public school, Washington Township Schools, that provides outstanding STEM offerings for all grades of diverse genders, races, ethnicities, and socio-economic history. And nearby are other schools that also provide for their students in stable, proven models. In November 2023, James Betley, the executive director of the Indiana Charter School Board stated that the ICSB no longer authorizes charter schools in Marion County. “It’s too crowded. It’s oversaturated. There are too many schools.” In 2019, Tindley Academy closed its single-gender STEM-focused charter school after poor enrollment—and that was *before* the ICSB declared oversaturation within the City. This oversaturation creates enhanced risk of closure, which then creates an abandoned building and neighborhood blight. That is not what this neighborhood needs.

Moreover, Paramount’s traffic study that it sought to hide raises significant safety concerns. The proposed changes by DPW warrant further review because it’s unclear if the sidewalks need to be moved to accommodate the change. Paramount publicly said that it has enough drive on its property to queue the cars, but that’s not what Paramount’s own traffic engineer said. In fact, the traffic engineer Paramount retained said significant driveway would need to be added to provide sufficient queue for the cars dropping students off. Paramount then shopped around for a second opinion and retained a new engineer. The second traffic engineer provided not a full study, but a simple short review based upon incomplete information, especially when compared with the comprehensive first study. Simply put, Paramount’s hastily drawn up plan intensifies use at the property without addressing significant safety issues visited upon its own families and those traveling in snarled traffic on Michigan Road.

In conclusion, oversaturation of this area out of alignment with the Comprehensive Plan that raises serious traffic safety concerns while enhancing risk that the charter school will close, leaving an abandoned building, is not what is needed here.

I, therefore, oppose the rezoning petition filed by Paramount Schools of Excellence, Inc., 2023-ZON-109. If you have any questions, please contact me at ron.gibson2@indy.gov.

Sincerely,

Ron Gibson
Councilman
District 8

Crooked Creek Land-Use Committee
C/O P. O. Box 68032
Indianapolis, IN 46268

February 20, 2024

Judy Weerts Hall, Hearing Examiner
200 E. Washington Street, Ste # 2042
Indianapolis, IN 46204

RE: Petition 2023-ZON-109 — 5136 Michigan Road

Dear Ms. Hall,

The Crooked Creek Land-Use Committee unanimously oppose the approval of Petition 2023-ZON-109. There are numerous reasons why we oppose this petition.

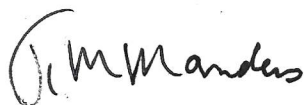
Our experience with some schools that are **in** our Community, but not **of** our Community — meaning they do not cooperate or collaborate with our Community — create problems, not solutions in our Community. The lack of community out-reach by Paramount Schools has been and is unacceptable and is a warning as to future relations. Their lack of out-reach is evident in that fellow Crooked Creek neighborhood organization, Highland-Kessler Civic League, had to organize the only public meeting that took place within our Community and with our residents. Paramount only advised our Community with a legal notice of their intentions after they already purchased the site, without any knowledge or input from our Community. When they had a public meeting, it took place before they even knew where their proposed school was to be located and outside of our Community. I understand that **no one attended**. Clearly Paramount Schools have not completed the “due diligence” required to locate their proposed school at 5136 Michigan Road.

Traffic congestion is a major concern for residents and commuters traveling along the busy Michigan Road corridor (over 40,000 cars a day). We are not satisfied with their traffic study. We believe it is flawed. The impact of a daily school verses a neighborhood church is striking. The increase will be particularly difficult since the school offers no transportation, so multitudes of cars will be congesting Michigan Road at critical times of the day.

The overwhelming majority of our residents support our Washington Township School system and believe Paramount’s proposed school will harm our public school system financially. Institutions like Paramount are well known to manipulate their student body count by dismissing students **after** “count day” shifting the students back to Washington Township Schools while “holding” the funds that go with the student and provided based on “count day” — harming our public schools who are required to accept these students with out the funds that should accompany the student. This practice goes on regularly with these private and charter schools — harming our public school institutions. This practice is unacceptable. Paramount’s representatives admitted that this practice takes place. In addition, special needs students also are harmed by this practice.

We believe that Paramount School’s request is not supported by the Michigan Road Corridor Plan, as well as the aforementioned concerns. Petition 2023-ZON-109 should **not** be approved. **We request and support denial of this of this petition!**

Sincerely yours,



Kerry Michael Manders
Chair, Crooked Creek Land-Use Committee



March 12, 2024

Dear Members of the Metropolitan Development Commission:

On behalf of the International School of Indiana (“ISI”), we write in opposition to the rezoning petition (2023-ZON-109) filed by Paramount Schools of Excellence, Inc. (“Paramount”). Paramount has filed this rezoning petition because the proposed land use of the property at 5136 Michigan Road is out of compliance with the City-County’s prudent Comprehensive Plan. This Comprehensive Plan desires schools to be located in different residential areas. That wise planning contemplates placing new schools in areas where there are growing households to create new demand for schools. Not only is there no new demand being created by new households, indicators point to shrinking demand within this neighborhood.

In addition to the planned use described in the zoning petition being inconsistent with the wisdom of the Comprehensive Plan, the proposed site development exponentially increases the intensity of the site, which directly and adversely impacts ISI, its families, and surrounding neighbors. The majority of ISI students and families travel south on Michigan Road, requiring them to travel past Paramount’s proposed site. With another school zone to navigate—in addition to Crooked Creek Elementary School and St. Monica’s Catholic School—rush hour traffic in the mornings would generate substantial traffic concerns. Adding a new school where up to 300 cars could be queued onto Michigan Road creates an unsafe environment without an apparent remedy. And nothing about the current plans or commitments limit Paramount from increasing student enrollment beyond 300 or allowing other charter schools to locate on the premise, further increasing the traffic load.

For these reasons, the International School of Indiana opposes the re-zoning petition 2023-ZON-109 filed by Paramount Schools of Excellence.

Sincerely,

Alonzo Weems
Chairperson, Board of Directors
International School of Indiana

Elizabeth Head
Head of School
International School of Indiana



**A RESOLUTION OPPOSING NEW PARAMOUNT SCHOOLS OF EXCELLENCE
CHARTER SCHOOL LOCATING IN WASHINGTON TOWNSHIP**

WHEREAS, the legal process to create new charter schools in Indiana require public approvals, public hearings, and approval from an authorizer;

WHEREAS, our community recently discovered that Paramount School of Excellence, Inc. (“Paramount”) seeks to open a charter school on the border of the Metropolitan School District of Pike Township and the Metropolitan School District of Washington Township;

WHEREAS, Paramount did not obtain authorization for the new charter school from the City of Indianapolis Mayor’s Office, as it has done in the past, but instead obtained authorization from Trine University in Angola, Indiana, 175 miles north of Indianapolis;

WHEREAS, Paramount did not adequately solicit input from surrounding neighbors or community organizations prior to filing a petition to rezone the property or prior to pursuing a charter school;

WHEREAS, Marion County residents are not well served by another charter school as the Executive Director of the Indiana Charter School Board James Betley said in a November 30, 2023, article¹, “[The Indiana Charter School Board] do[esn’t] authorize in Indianapolis any more, really. It’s too crowded. It’s oversaturated. There are too many schools.”;

WHEREAS, the model Paramount proposes with the new charter school was previously tried by another north-side Indianapolis charter school² that no longer uses that model and closed the school³;

WHEREAS, Paramount’s new charter school is opposed by the Highland Kessler Civil League, the Crooked Creek Land Use Committee, members of the Indiana General Assembly, City-County Councilors, and hundreds of community members;

WHEREAS, the oversaturation of charter schools in Marion County, a similar school model previously did not succeed, and community opposition to this new charter school elevates the risk of closure; and

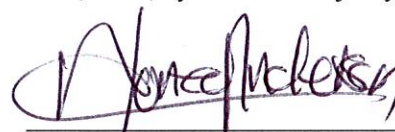
WHEREAS, the closing of charter schools in Marion County adversely impacts student learning and adversely impacts our community.

NOW, THEREFORE, BE IT RESOLVED that the Board of Education of the Metropolitan School District of Pike Township hereby opposes the opening of a new charter school by Paramount Schools of Excellence in Washington Township.

THIS RESOLUTION adopted this 14th day of March, 2024, by at least a majority vote of the entire Board of Education in a public meeting.



Matt Hopp, Secretary
Board of Education



Alonzo Anderson, President
Board of Education

¹ <https://www.chalkbeat.org/indiana/2023/11/30/charter-school-closures-point-to-questions-about-authorizer-oversight/>

² <https://impact100indy.org/2013-100000-grant-winner-tindley-consolidates-middle-schools/>

³

<https://www.chalkbeat.org/indiana/2019/6/5/21108309/dogged-by-money-trouble-and-low-enrollment-tindley-will-downsize-its-charter-network/>

Annette M. Johnson
Pike Township Trustee

*5665 Lafayette Rd. Suite C
Indianapolis, Indiana 46254*

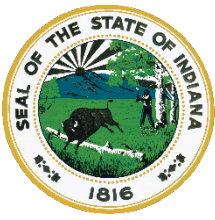
To Rezoning Board:

I ask you to reject the rezoning of the property at 5136 Michigan Road, Case Number, 2023-ZON-109. The rezoning of this property to allow another charter school to open up will have a negative impact on the quality of life and quality of education not only in Washington Township, but in Pike Township and across Indianapolis. As the elected leader of the Pike Township Fire Department, I am especially worried that the turning of this property into a charter school as currently proposed will have a negative impact on traffic safety. The leadership of this charter school seemingly tried to keep quiet the results of its own traffic study. The school will not service; so every student will need to drop off and pick up. Our Fire Department is often called out to this very busy stretch of road for accidents, already. Without major changes, I am deeply worried that we will create unsafe traffic conditions on Michigan Road. Essentially, the traffic study showed that major construction needs to be done on Michigan Road and on the property itself to create a safer student drop-off zone. Their traffic study called for multiple turn/exit lanes on Michigan Road, the acquisition of nearby residential properties, and more drop off line space for the morning and afternoon carlines.

If allowed to go forward as is, there could be unsafe congestion spilling from the property onto Michigan Road and putting the safety of young families and school workers at risk. I am also alarmed that the campus will be operating on a septic tank and not connected to the city system. This could cause environmental and health problems for students, school employees, and neighborhood residents alike. More so, I think the rezoning of this property is bad public policy for the city of Indianapolis. At a January meeting, Paramount leadership confirmed that they were anti-union and would fight any attempt of staff to seek collective bargaining. We need employers that will respect the rights of employees. Meanwhile, Washington Township and Pike Township Schools already exist in the area with strong STEM programs. This unnecessary school could take \$3 million dollars a year out of school budgets without solving any of the economic inequality problems that plague our students, education systems, and community. Please reject this zoning request.

Sincerely,

Annette M. Johnson, Trustee
Pike Township



**STATE OF INDIANA
HOUSE OF REPRESENTATIVES**

THIRD FLOOR STATE HOUSE
INDIANAPOLIS, INDIANA 46204

CAREY HAMILTON
DEMOCRATIC CAUCUS CHAIR
200 WEST WASHINGTON ST.
INDIANAPOLIS, IN 46204

COMMITTEES:
ROADS AND TRANSPORTATION
UTILITIES, ENERGY AND TELECOMMUNICATIONS
STATUTORY COMMITTEE ON ETHICS

March 6, 2024

Dear Metropolitan Development Commission Members,

As the State Representative for a large part of the Metropolitan School District of Washington Township, a school district heavily impacted if this new charter school is allowed to open, I wish to express my concerns.

Community members from Washington Township have brought to my attention the lack of transparency from Paramount regarding their intention to establish a new charter school in this location. Prior to filing any zoning petition, Paramount never engaged the community to solicit input. Paramount states they held a public hearing in nearby Pike Township, but no one appeared. And now the District learns that Paramount has sat on an important traffic study for months without disclosing it while representing to the public that the traffic study was being prepared.

This project raises a number of significant concerns. The traffic study completed by Paramount's own traffic engineers expresses sincere concerns about the safety of its students and those traveling on Michigan Road. Paramount has no plans to install two turn lanes, and it is unclear if Paramount will have adequate staffing of traffic officers. However, the officers are a temporary band aid more appropriate for one-time events, not an adequate remedy for significant traffic stoppage during the busiest traffic times on a major Indianapolis artery. There may be plenty of other appropriate locations for a school in our City, but this is not one of them.

In addition, over the past year, Indianapolis had two charter schools close due to insufficient enrollment and financial issues. Mid-year closures are incredibly disruptive to student learning and the potential for a school to take public tax dollars away from our public schools only to shut down after a few years is cause for concern.

My final concern is whether this institution is needed in our community. A new charter school means less of our tax dollars going to Washington schools which the majority of the community children attend. Public schools surrounding the proposed location provide excellent STEM education to a diverse group of students. In my view, funding another school is redundant when the needs Paramount proposes to address are already fulfilled by our public schools.

I support opposition to permitting Paramount Schools to open a charter school at the Michigan Road location and obtaining the necessary rezoning. Thank you for your consideration. If there are any questions, please reach out to my office at h87@iga.in.gov or 317-233-5248.

Sincerely,

Carey Hamilton
State Representative
District 87

STATE OF INDIANA
HOUSE OF REPRESENTATIVES
THIRD FLOOR STATE HOUSE
INDIANAPOLIS, INDIANA 46204

CHERRISH S. PRYOR
DEMOCRATIC FLOOR LEADER
200 WEST WASHINGTON STREET
INDIANAPOLIS, IN 46204
1.800.382.9842
H94@IN.GOV

COMMITTEES:
WAYS AND MEANS
LOCAL GOVERNMENT

January 3, 2024

Highland-Kessler Civic League,

As the State Representative for parts of Washington and Pike Township, two school systems most impacted if this new charter school is allowed to open, I thought it was prudent to express my concerns at this community meeting.

Community members from Washington and Pike Township have brought to my attention the lack of notice from Paramount regarding their intention to establish a new charter school in this location. While this informational community meeting was called, Paramount's communication with the surrounding school corporations has proven to be insufficient. Their lack of transparency and cooperation is disconcerting, particularly considering our townships will be obligated to allocate our tax dollars should the school be permitted to open.

In the past year, Indianapolis had two charter schools close due to insufficient enrollment and financial issues. Mid-year closures are incredibly disruptive to student learning and the potential for a school to take public tax dollars away from our public schools only to shut down after a few years is cause for concern.

Additionally, the property in question, an old church building, is currently zoned for use as a religious institution, not an educational facility. The proposed change in use will disrupt local traffic patterns and is incongruent with the current comprehensive plan in place on proper use of the property. It is troubling that despite this property requiring rezoning approval, Paramount has chosen to advertise enrollment for the 2024-2025 school year.

My final concern is whether this institution is needed in our community. A new charter school means less of our tax dollars going to Washington and Pike Township which the majority of the community children attend. Both townships surrounding the proposed location provide excellent STEM education to a diverse group of students. In my view, funding another school is redundant when the needs Paramount proposes to address are already fulfilled by our public schools.

I support my local townships in their opposition to permitting Paramount Schools to open a charter school at the Michigan Road location. If there are any questions, please reach out to my office at H94@iga.in.gov or 317-232-9798.

Sincerely,



STATE OF INDIANA
HOUSE OF REPRESENTATIVES

THIRD FLOOR STATE HOUSE
INDIANAPOLIS, INDIANA 46204

ED DELANEY
ASSISTANT DEMOCRATIC CAUCUS CHAIR
200 W. WASHINGTON STREET
INDIANAPOLIS, IN 46204

COMMITTEES:
STATE BUDGET COMMITTEE
EDUCATION
WAYS AND MEANS

February 16th 2024

To the Metropolitan Development Commission Hearing Examiner,

I am writing to you today to comment on the proposed Paramount charter school that is attempting to locate in Washington Township. It has been brought to my attention that Paramount plans to open their school just south of Crooked Creek Elementary School. Local community members in Washington Township have expressed great concern over this proposal and I feel I must echo those concerns.

I oppose this proposal on several grounds. There are currently several high-performing schools close by, including Crooked Creek Elementary and Westlane Middle School. Authorizing a new charter school in this area will only decrease attendance for our nearby schools. Additionally, I have concerns about how Paramount has handled this process thus far.

Paramount has failed to hold required community meetings, they have failed to notify the school district, and they have failed to secure proper zoning for their newly purchased building. The Metropolitan School District of Washington Township and the local HOA, the Highland Kessler Civic League, also oppose the rezoning for a variety of reasons. There are already multiple Washington Township schools in the area specifically working to provide STEM opportunities that are available to every student.

If Paramount seeks to make a meaningful contribution to the community, they should seek out spaces where it is truly needed and wanted. Placing this school in this community at this time does not make sense for any of the affected parties with the possible exception of Paramount.

Thank you for the opportunity to bring a voice to this proposal. I trust that the commission will give this careful attention. Should you have any other questions or concerns, feel free to reach out to my office.

Kind regards,

Ed DeLaney
State Representative
House District 86



**STATE OF INDIANA
HOUSE OF REPRESENTATIVES**

THIRD FLOOR STATE HOUSE
INDIANAPOLIS, INDIANA 46204

GREGORY W. PORTER
3614 N. PENNSYLVANIA
INDIANAPOLIS, IN 46205

COMMITTEES:
STATE BUDGET COMMITTEE
INSURANCE
PUBLIC HEALTH
WAYS AND MEANS, R.M.M.

February 28, 2024

Dear Metropolitan Development Commission Hearing Examiner:

I am writing to you as a state representative from the near northside and east side of Indianapolis. Specifically, I am representing Washington Township residents and their public schools in this letter. Over the last few weeks, numerous community groups have contacted me regarding the proposed rezoning to turn the former Witherspoon Presbyterian Church at 5136 Michigan Rd. into a charter school.

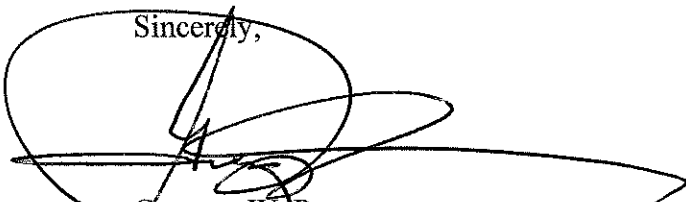
In June of 2023, the Paramount School of Excellence had a public meeting regarding the rezoning at the Eagle Branch Library in Pike Township. According to Paramount's own leadership, no one attended the event. At a recent meeting on January 3, 2024, 85 residents of the local community voiced their overwhelming opposition to the proposed project.

Community members cited two major problems with the project. First, there is no detailed site plan for the 10-acre property. Furthermore, the site is not connected to the city sewer system. Second, community members are concerned about the increased traffic the site will cause. The Paramount School does not provide transportation for their students so parents will have to do drop-off and pick-up of students. It is not clear whether the Paramount School has done a detailed study of how the opening of their school will impact traffic flow on Michigan Rd.

In addition, MSD of Washington has great schools that have excellent STEM programs. The community overall is happy with their public school system. The Paramount School has not offered a legitimate need to have their school at this location.

I have consistently heard from area residents that the use of this site for a charter school has not been thoroughly researched or thought out. There is a belief that this project is being forced down the community's throat. I, therefore, must voice my opposition to this proposed project and stand with area residents and school board members. If you would like to discuss this matter in further detail, please contact me.

Sincerely,



Gregory W. Porter
State Representative
House District #96



**STATE OF INDIANA
HOUSE OF REPRESENTATIVES**

THIRD FLOOR STATE HOUSE
INDIANAPOLIS, INDIANA 46204

ED DELANEY
ASSISTANT DEMOCRATIC CAUCUS CHAIR
200 W. WASHINGTON STREET
INDIANAPOLIS, IN 46204

COMMITTEES:
STATE BUDGET COMMITTEE
EDUCATION
WAYS AND MEANS

March 5th 2024

To the Metropolitan Development Commission Members,

I am writing to you today to comment on the proposed Paramount charter school that is attempting to locate in Washington Township at 5136 Michigan Road, Indianapolis Indiana. It has been brought to my attention that Paramount plans to open their school just south of Crooked Creek Elementary School. Local community members in Washington Township have expressed great concern over this proposal and I feel I must echo those concerns.

I oppose this proposal on several grounds. There are currently several high-performing schools close by, including Crooked Creek Elementary and Westlane Middle School. Authorizing a new charter school in this area will only decrease attendance for our nearby schools. Additionally, I have concerns about how Paramount has handled this process thus far.

Paramount has failed to hold required community meetings and has failed to notify the school district. The Metropolitan School District of Washington Township and the local HOA, the Highland Kessler Civic League, also oppose the rezoning for a variety of reasons. There are already multiple Washington Township schools in the area specifically working to provide STEM opportunities that are available to every student.

If Paramount seeks to make a meaningful contribution to the community, they should seek out spaces where it is truly needed and wanted. Placing this school in this community at this time does not make sense for any of the affected parties with the possible exception of Paramount.

Thank you for the opportunity to bring my voice to address this proposal. I trust that the commission will give this careful attention. Should you have any other questions or concerns, feel free to reach out to my office.

Kind regards,

Ed DeLaney
State Representative
House District 86

STATE OF INDIANA
HOUSE OF REPRESENTATIVES
THIRD FLOOR STATE HOUSE
INDIANAPOLIS, INDIANA 46204

VICTORIA GARCIA WILBURN
STATE REPRESENTATIVE
HOUSE DISTRICT 32
200 WEST WASHINGTON STREET
INDIANAPOLIS, IN 46204

EMPLOYMENT, LABOR AND PENSIONS
FAMILY, CHILDREN AND HUMAN AFFAIRS
JUDICIARY

March 18, 2024

Dear Metropolitan Development Commission Hearing Examiner,

I am writing to ask that you deny petition 2023-ZON-109 to rezone the existing facility from an SU-1 to an SU-2 for educational use. As the State Representative for District 32, many of my constituents live in Washington Township, one of the school systems most impacted by your decision. I ask you to listen to the community opposition and deny the rezoning request.

There are several examples that lead to apprehension of Paramount Schools of Excellence's intention and ability to work collaboratively with the existing school corporations. Their failure to inform local school officials of their intent to enter the area, reuse of language from an attempt to enter a previous school district, and lack of advertisement for their legally required community meetings has not engendered community trust of this initiative.

A community group, the Highland Kessler Civic League, held their own meeting to better inform residents in the immediate area. No one who attended that meeting spoke in support of this proposed new charter. Many voiced concerns over increased risk to public safety given the large increase in daily traffic, improper sewage infrastructure, and conflicts with the area's current comprehensive development plan. While a representative of Paramount was in attendance, the organization has still not assuaged the community anxieties on these issues.

In light of these troubling developments, I urge you to heed the community's opposition to this proposed project and oppose the rezoning of the Michigan Road property. Our students and their families deserve better than to be subjected to an institution that has not engaged with the appropriate local stakeholders and fully addressed community concerns. If you have any questions regarding my opposition, please contact my office at 317-232-9798 or H32@iga.in.gov.

Sincerely,



Victoria Garcia Wilburn
State Representative
House District 32