

## Blackham, Kathleen

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**Sent:** Sunday, February 2, 2025 2:03 PM  
**To:** Blackham, Kathleen  
**Cc:** PlannerOnCall; Whitaker, Nancy G.  
**Subject:** 2155 Kessler Blvd West Drive  
**Attachments:** IFA-- Indianapolis Urban Forest Protection Plan with Appendices.docx.pdf

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Hello Kathleen and Metropolitan Development Commission,

Remonstrators' counsel Greg Zubek quoted from the Borsuk v. Town of St. John decision about the comprehensive plan in the January 23 hearing. It was apropos and warrants documenting:

From the Supreme Court's decision:

"The benefits of comprehensive plans are numerous. Comprehensive plans play a central role in zoning inasmuch as they rationally allocate land use with due consideration given to the community as a whole. *Udell v. Haas*, [21 N.Y.2d 463](#), [288 N.Y.S.2d 888](#), [235 N.E.2d 897, 900-01](#) (1968). Such plans help shape the identity of communities and give private property owners notice of this identity and expectations for the future. ...

Thus, [Indiana Code § 36-7-4-603](#) sensibly states that the plan commission and legislative body "shall pay reasonable regard to" a number of enumerated factors: "(1) the comprehensive plan; (2) current conditions and the character of current structures and uses in each district; (3) the most desirable use for which the land in each district is adapted; (4) the conservation of property values throughout the jurisdiction; and (5) responsible development and growth. *Id.*"

To reinforce the point, following is a pertinent excerpt from the cited 1968 *Udell* decision, which excerpt was actually included in the 1991 Comprehensive Plan in the chapter *Mechanisms for Plan Implementation--Zoning*. It emphasizes the importance of the broad community interest and the foundational importance (for zoning) of the comprehensive plan:

*"In exercising their zoning powers, the local authorities must act **for the benefit of the community as a whole** following a calm and deliberate consideration of the alternatives, and not because of the whims of either an articulate minority or even majority of the community. ... Thus, the mandate ... [that zoning be "in accordance with a comprehensive plan"] is not merely a technicality which serves only as an obstacle course for public officials to overcome in carrying out their duties. **Rather, the Comprehensive Plan is the essence of zoning. Without it, there can be no rational allocation of land use**". *Udell v. Haas*, 1968 (emphasis added)*

In addition to the myriad other objections, rezoning this property as petitioned would constitute the death knell for the 8 acres of mature woodland on the site. It would not be in the interest of *the community as a whole* to "clearcut" (staff's testimony) the woods-- it would primarily be in the financial interest of the private, for-profit development company. The attached 2021 report by the Indiana Forest Alliance documents the high value of Marion County's remaining woodlands.

Clarke Kahlo

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# FORESTS FOR INDY

Indianapolis Urban Forest Protection Plan

Pre-Release Draft - January 7, 2020

## Abstract

The Indiana Forest Alliance, with assistance from The Conservation Fund, is supporting sustainable and vibrant neighborhoods in Indianapolis through this assessment, identification, and analysis of unprotected forests that helps target future conservation efforts.

Indiana Forest Alliance & The Conservation Fund

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<https://indianaforestalliance.org/forests-for-indy/>

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## **Executive Summary**

Prioritizing the preservation of existing unprotected forests in Indianapolis is the aim of Forests for Indy, the first-ever project of its kind in Indiana's capital city. Coordinated by the Indiana Forest Alliance, this initiative has the potential to lift Indianapolis from being one of the most park-poor big cities to making it a national model by preserving and connecting riparian woodlands throughout the urban landscape.

To protect forests in Marion County, a map was developed to identify unprotected forests, including 4,237 unique tree canopy segments in Marion County. Each forest segment was scored for its environmental, ecological and social benefits, and assessed for potential conservation strategies.

This report, jointly produced by Indiana Forest Alliance and The Conservation Fund, identifies a variety of funding mechanisms that could support conservation strategies for important forest parcels. It also prioritizes which parcels would be most suitable for each type of conservation strategy. Each conservation strategy has different combinations of legal/programmatic requirements, funding needs, and funding sources.

Protection of riparian buffers and important wildlife habitat would provide additional leverage opportunities with federal, state, and utility funds for open space protection or compliance with the city's Long-Term Control Plan. In particular, there are opportunities with Citizens Energy Group and Reconnecting Our Waterways in the White River and Fall Creek watersheds. Although still in their early stages, an array of carbon programs are also emerging where landowners of larger forested properties may be able to receive compensation for maintaining their properties in a forested land cover.

The implementation of plans outlined in this report to restore more tree canopy in Indianapolis will lead to greatly enhanced ecosystem services within Marion County and expanded recreational opportunities for residents as well. Small vacant properties with high environmental, social, and economic benefits may be excellent opportunities to expand the park system. Protection of forests in areas with no public forests would expand recreational opportunities for under-served communities.

A key next step of the Forests for Indy initiative will be to ground-truth these potential protection priorities and validate the opportunities. Another critical move will be to continue to work with the collaborative partnership already established to explore the feasibility of the protection strategies outlined in this report, especially the emerging carbon programs and the City's carbon neutrality pledge. Advocacy for an increase in per capita spending for parks and open space also will be very important if Indianapolis is to adequately compete with peer cities for business relocation and other economic development efforts.

Indianapolis needs to greatly increase its local investment to stretch further the funding available from the statewide Land and Water Conservation program. Another way to stretch the forest protection dollars further would be to establish a network of Forest Preserves in Indianapolis similar to the Chicago model. This would allow forest protection at a lower management cost per acre than traditional city/county parks.

By the end of 2023, this project will produce: 1) a robust protection plan for Indianapolis' most valuable forests (outside of forests currently protected); 2) residents in the surrounding communities inspired and empowered to get involved in protecting their neighborhood forests; and 3) city leaders moving to protect these forests in plans implemented by the city, utility districts, and other partners.



## I. Forests for Indy Overview

### **Collaborative Initiative:**

Launched in spring 2018, Forests for Indy (FFI) is the first-ever proactive, collaborative effort coordinated by the Indiana Forest Alliance (IFA) to identify and preserve forests remaining in Indianapolis. While other organizations have established tree canopy goals and developed plans for prioritizing areas where tree planting is most needed, Forests for Indy is the first initiative to prioritize the preservation of existing unprotected forest. The goal for the total five-year Forests for Indy project is to save more of the remaining forests in Indianapolis for public benefit and quality of life. By the end of 2023, this project will produce: 1) a robust protection plan for Indianapolis' most valuable forests (outside of forests currently protected); 2) residents in the surrounding communities inspired and empowered to get involved in protecting their neighborhood forests; and 3) City leaders moving to protect these forests in plans implemented by the City, utility districts, and other partners.

The Forests for Indy steering committee includes representatives from Central Indiana Land Trust, the Reconnecting Our Waterways/White River Vision Plan initiative, Groundwork Indy, Indianapolis Neighborhood Resource Center, Keep Indianapolis Beautiful, University of Indianapolis, Christian Theological Seminary, Amos Butler Audubon Society, Sierra Club, Hoosier Environmental Council, and area realtors. IFA also participates in the Ecological Committee of Reconnecting Our Waterways, a key partner in riparian forest protection. IFA is reaching out to neighborhood organizations to explore and promote the importance of conservation plans for urban forests in their communities and explain the Forest for Indy's prioritization process that recognizes the need to protect these forests.

### **Benefits of Forests:**

The presence of forests can provide economic, environmental, and social benefits, creating healthy and vibrant communities. With 81 percent of Americans living in urban centers<sup>1</sup>, forests are not just an aesthetics issue, they are a major determinant of community well-being. The Forests for Indy Project addresses the following needs of Indianapolis:

#### Improve Physical and Mental Health:

People living in neighborhoods with less than 10 percent tree canopy are much more likely to report symptoms of depression, stress, and anxiety than those who have access to green space. The 2018 American Fitness Index<sup>2</sup> ranks Indianapolis 99th out of the country's largest 100 cities in promoting healthy and active lifestyles, and in 2020, Mental Health America<sup>3</sup> ranks Indiana as 26th out of 50 states in the nation for overall mental health – meaning urban forests have a space in the health conversation for Indiana.

#### Provide Environmental Services:

According to Purdue University, Indianapolis' urban forests provide stormwater control, carbon sequestration, energy reduction and air pollution filtration resulting in a \$10 million annual

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<sup>1</sup><https://www.census.gov/programs-surveys/geography/guidance/geo-areas/urban-rural/ua-facts.html>

<sup>2</sup>[https://www.americanfitnessindex.org/wp-content/uploads/2018/05/2018-American-Fitness-Index-Summary-Report\\_FINAL-20180504.pdf](https://www.americanfitnessindex.org/wp-content/uploads/2018/05/2018-American-Fitness-Index-Summary-Report_FINAL-20180504.pdf)

<sup>3</sup> <https://www.mhanational.org/issues/ranking-states#overall-ranking>

benefit.<sup>4</sup> While urban areas are predominantly made up surfaces that are impervious or covered with buildings, urban trees and forests have a proven track record of absorbing storm water and preventing flooding as well as improving water quality, cooling summer heat, reducing noise, and providing habitat for urban wildlife. Strategically placed forests in urban areas can lower temperatures in cities from between 2-5 degrees.<sup>5</sup>

#### Support a Growing Economy:

Forests and green space raise property values, strengthen community cohesion, spur community revitalization, attract young professionals, and help to avoid “brain drain.” The presence of trees close to residential neighborhoods has even been shown to reduce crime. In a study focused on urban Baltimore, researchers found a 10% increase in urban tree canopy correlates with a 12% decrease in crime.<sup>6</sup>

#### Enhance Quality of Life for All:

There is a correlation between access to urban green spaces and socioeconomic status. According to the Trust For Public Land’s 2017 ParkScore Index<sup>7</sup>, Indianapolis’ park system ranked 99th out of America’s 100 largest cities, in part because nearly two thirds of its residents live more than a 10-minute walk from a park, with many of them in lower income neighborhoods.<sup>8</sup> Preserving forests gives us an opportunity to help remedy systemic inequalities in our community. Access to nature in an urban setting can even help remediate some health disparities between low and high-income neighborhoods.

#### Meet Land Use Goals:

“Preserving critical environmental areas” is one of the ten widely accepted “smart growth” principles. Forest preservation will help Indianapolis realize all of its Plan 2020 Bicentennial Agenda core values<sup>9</sup>, including helping to make Indianapolis a more competitive city attractive to residents looking for a healthy place to live.

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<sup>4</sup> <https://ag.purdue.edu/indianaclimate/urban-ecosystems-report/>

<sup>5</sup> <https://www.connect4climate.org/article/how-trees-are-revolutionizing-cities-around-world>

<sup>6</sup> [https://www.ncrs.fs.fed.us/pubs/jrnl/2012/nrs\\_2012\\_troy\\_001.pdf](https://www.ncrs.fs.fed.us/pubs/jrnl/2012/nrs_2012_troy_001.pdf)

<sup>7</sup> [https://parkserve.tpl.org/mapping/historic/2017\\_ParkScoreRank.pdf](https://parkserve.tpl.org/mapping/historic/2017_ParkScoreRank.pdf)

<sup>8</sup> <https://parkserve.tpl.org/mapping/index.html?CityID=1836003#reportTop>

<sup>9</sup> <https://plan2020.com/>

**Photo of opening in Crown Hill North Woods:**



## II. Urban Forest Vulnerability and Prioritization

### Why Indianapolis urban forests are important:

An urban forest is a forest or collection of trees within a city, town or suburb. While the general public may not be accustomed to thinking of these wooded urban areas as a forest, there is a growing recognition that “over 130 million acres of America’s forests are located in cities and towns, and that these trees provide essential benefits for humans and improved habitats for urban wildlife”.<sup>10</sup> Urban forests are an integral part of community ecosystems, and can be viewed as green infrastructure that provides real services to the community, such as stormwater absorption.<sup>11</sup> The Indiana Forest Alliance has identified more than 4,000 forests greater than 1 acre in size within Indianapolis, most of which are privately owned and unprotected at this time. Right now, Indianapolis has the potential to protect and expand these urban forests, and an opportunity to maximize the services they provide. In this report, we explore in detail the potential for protecting these urban forests, including mechanisms for funding their conservation.

As described above, urban forests provide a broad array of important benefits to the community, including improved water quality, flood control, air quality, heat abatement, wildlife habitat, and public enjoyment. Tree canopy, specifically the amount and distribution of leaf surface area, determines the urban forest’s ability to provide these ecosystem services. The leaves in the tree canopy and understory as well as decaying wood and leaf litter on the forest floor intercept and absorb precipitation, slowing down water infiltration, which in turn minimizes soil erosion, and reduces flooding. Water absorption through the root systems can also mitigate stormwater impacts. In addition, the roots of trees along waterways can help hold stream banks in place and minimize bank erosion. Urban trees and forests also provide important aesthetic values that contribute to economic prosperity of our communities. In addition, opportunities for city dwellers to connect with nature and engage in recreational opportunities in natural settings should not be under-estimated, as they contribute to physical and mental well-being.

The benefits of trees in watershed protection have long been recognized, and the preservation of forests is an integral part of the White River Vision Plan. Published in 2019 as a collaboration between Indianapolis and Hamilton County, this plan outlines action steps including “Promote healthy streamside forests/riparian corridors to mitigate impacts of floodplain development on stream health” as a key part of the Plan’s goal to protect and restore the White River floodplain and build resilience to changing climate conditions.<sup>12</sup> The White River Vision Plan also promotes coordination of forest habitat and conservation work “to identify forests that are not protected, to assess the quality of the forests, and establish priorities for preserving high quality forests and forest cover in general [to] orient future park selection, acquisition from willing landowners, and other conservation around the highest priority forests on private lands...<sup>13</sup>

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<sup>10</sup> <https://www.americanforests.org/blog/what-is-urban-forestry-a-quick-101/>

<sup>11</sup> [https://www.fs.fed.us/openspace/fote/reports/nrs-62\\_sustaining\\_americas\\_urban.pdf](https://www.fs.fed.us/openspace/fote/reports/nrs-62_sustaining_americas_urban.pdf)

<sup>12</sup> [https://mywhiteriver.com/wp-content/uploads/2020/03/WRVP-Report\\_Final\\_Web.pdf](https://mywhiteriver.com/wp-content/uploads/2020/03/WRVP-Report_Final_Web.pdf) p 69.

<sup>13</sup> [https://mywhiteriver.com/wp-content/uploads/2020/03/WRVP-Report\\_Final\\_Web.pdf](https://mywhiteriver.com/wp-content/uploads/2020/03/WRVP-Report_Final_Web.pdf) p86.

In 2019, the City also released the Thrive Indianapolis plan with the goal of improving the City's preparedness and resilience to changes that are expected in the coming decades. Resilience is the ability to withstand changes. The Thrive plan recognizes the importance of trees and urban forests, stating, "(t)he value that trees bring to a neighborhood is immense - from improving air quality to reducing temperatures and energy use to delivering mental health benefits. Our tree canopy contributes to our resilience...".<sup>14</sup>

In 2016, Indianapolis commissioned a Tree Management Plan, prepared by the Davey Resource Group.<sup>15</sup> In it, they quantify the benefits provided by Indianapolis trees. They estimate that Indianapolis trees provide approximately \$9,970,035 in annual benefits. The Indianapolis Tree Management Plan focuses exclusively on street trees, so this estimate does not include benefits provided by forests in the City. Nevertheless those benefits provided by street trees include:

- Aesthetic and other benefits: valued at \$4,832,549 per year.
- Air quality: 283,293 pounds of pollutants removed valued at \$351,332 per year.
- Carbon sequestered and avoided: 45,286,518 pounds valued at \$149,446 per year.
- Energy: conserving 10,656 megawatt-hours (MWh) and 241,199 therms (heat energy units, one therm represents the heat energy of approximately 100 cubic feet of natural gas) valued at \$1,311,515 per year.
- Stormwater: 536,321,425 gallons retained valued at \$3,325,193 per year.
- Return on investment: \$3.95 in benefits for every \$1 spent on municipal forestry

#### Differences between parks and forests:

According to our analysis of satellite imagery, the Indianapolis urban forest encompasses more than 35,000 acres, including roughly 5,320 acres of forests that are protected in parks<sup>16</sup> and about 30,639 acres of unprotected private forests. Indianapolis has some fantastic parks. Parks serve as places to unwind, gather, exercise and play. However most parkland is not forest, with many parks consisting primarily of lawns, playgrounds and parking areas. IndyParks manages 11,258 acres of greenspace in 212 parks, but that includes 129 playgrounds, 155 sports fields, 19 aquatic centers, and 13 golf courses, and the City has been struggling for years to fund their maintenance.<sup>17</sup>

Just as not all parks are forested, not all forests are parks. In fact the large majority of wooded areas in Indianapolis are not public parks at all, but privately owned properties. Since these urban forests are in private hands, they are not protected from development. The conservation of more of these forests will provide opportunities for Indianapolis to expand its network of public lands for the benefit of its residents. These forests could be maintained at far less expense than parks if they were managed as forest preserves because they need not include the same amenities that people expect in parks. Further, the ecosystem services that these forests provide would make them cost-effective with a 4:1 return on investment.<sup>18</sup>

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<sup>14</sup> Thrive Indianapolis, <https://www.thriveindianapolis.com/> p.19

<sup>15</sup> Davey Resource Group. 2016. Tree Management Plan: City of Indianapolis, prepared for the Department of Public Works. Copy available upon request from IFA.

<sup>16</sup> [https://www.fs.fed.us/psw/topics/urban\\_forestry/products/psw\\_cufr738\\_IND\\_MFRA.pdf](https://www.fs.fed.us/psw/topics/urban_forestry/products/psw_cufr738_IND_MFRA.pdf)

<sup>17</sup> <https://www.indy.gov/agency/department-of-parks-and-recreation>

<sup>18</sup> Davey Resource Group. 2016. Tree Management Plan: City of Indianapolis, prepared for the Department of Public Works. Copy available upon request from IFA.

Summary of Indianapolis tree canopy in context:

- Total area of the county: 368 square miles = 235,520 acres;
- Total acres of Indy forests: 56 square miles = 35,959 acres;
- Total number of forest segments: 4,237;
- Forest protected in parks: 8.3 square miles or 5,320 acres;
- Unprotected forests: 48 square miles = 30,639 acres.

#### Indianapolis Needs More Public Green Space:

In 2017, the Trust for Public Land released a ParkScore Index that evaluated “how well the 100 largest U.S. cities are meeting the need for parks,” and put Indianapolis squarely last on the list. The study looks at the percentage of residents within a 10-minute walk of a park. The ParkScore favors cities that have a dense population within a small area. Indianapolis, with combined City-County government, has only about 5% of its 226,000 acres of land in parks while Minneapolis, the top ranking city, has about 15% of its 34,000 acres in parkland.<sup>19, 20</sup> Minneapolis also has far more state conservation lands nearby than Indianapolis has, though these are not taken into consideration in the report.

The 2017 ParkScore Index indicates that only 35.4 % of Indianapolis residents have a park within a 10-minute walking distance.<sup>21 22</sup> Of the 100 cities covered in the report, 7 cities have a park within a 10-minute walk for more than 95% of their residents, 26 cities have a park within a 10-minute walk for 80% of their residents, and only 22 cities have less than 50% of their residents with such access; Indianapolis ranks near the bottom.<sup>23</sup> The ParkScore Index provides valuable information about areas in greatest need of park space (see Figure 1 reprinted from the Trust for Public Land’s ParkScore website) and highlights the special challenges that a city as large as Indianapolis faces in making parks accessible to all its residents, especially those households that do not have cars.

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<sup>19</sup> [https://www.tpl.org/sites/default/files/files\\_upload/CityParkFacts\\_2017.4\\_7\\_17.FIN\\_LO.pdf](https://www.tpl.org/sites/default/files/files_upload/CityParkFacts_2017.4_7_17.FIN_LO.pdf)

<sup>20</sup> Tom Gallagher, Indianapolis business Journal URBAN DESIGN: Our parks get a bad rap—even though spending lags. July 20, 2017

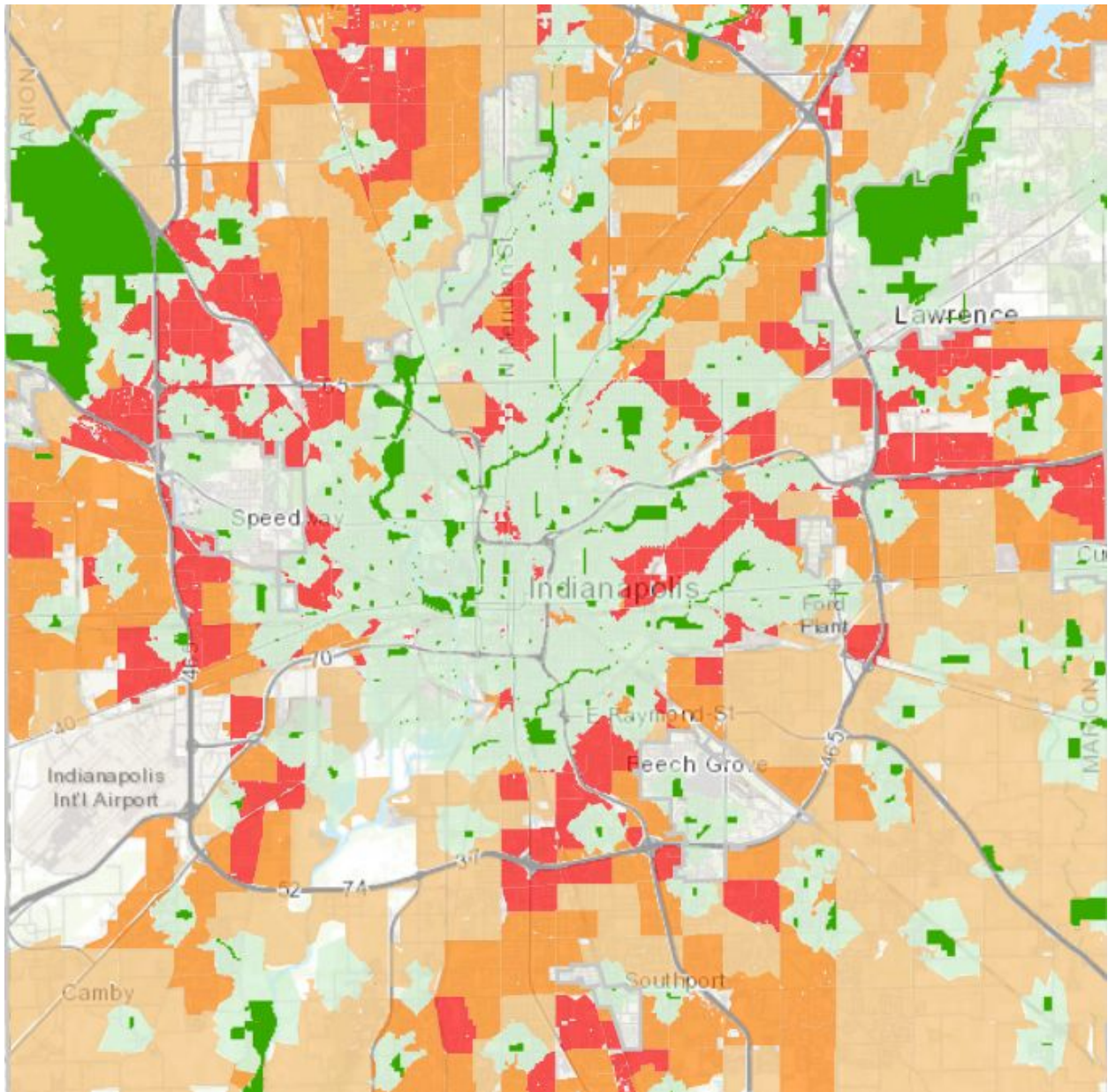
<https://www.ijb.com/articles/64692-urban-design-our-parks-get-a-bad-rapeven-though-spending-lags>

<sup>21</sup> [https://parkserve.tpl.org/mapping/historic/2017\\_ParkScoreRank.pdf](https://parkserve.tpl.org/mapping/historic/2017_ParkScoreRank.pdf)

<sup>22</sup> <https://parkserve.tpl.org/mapping/index.html?CityID=1836003>

<sup>23</sup> <https://www.tpl.org/2017-city-park-facts-report-and-related-files>

Figure 1: ParkNeed. Areas most in need of parks.



- Parks
- 10-minute walk park service area
- Park need
  - Very High
  - High
  - Moderate

In response to the ParkScore report, the Indianapolis Business Journal carried an article that explained some of the reasons why Indianapolis scored so poorly. The article concluded by emphasizing the importance of greenspace and urging Indianapolis to find creative ways to fund the City’s park system.<sup>24</sup> Historically, Indianapolis residents have not invested much in parks and green space. According to the Trust for Public Land, Indianapolis spends about \$50 per year per person on parks, including both capital and operating expenses, while the median spending for all cities was about \$83 per person in 2017. The Indianapolis Thrive plan indicates that Indianapolis residents spend only \$26 per person on parks, while the Indianapolis Business Journal estimates the figure is around \$35.<sup>25</sup> Whatever the exact figure, Indianapolis needs to find ways to fund the protection of urban forests and the expansion of public lands. As the City’s population grows and development pressure increases, the conservation of these greenspaces will become ever more important. This infrastructure already exists; it just needs to be protected.

**Table 1: Comparison of Spending on Parks in Selected Cities**

(adapted from the Trust for Public Land, where the estimate for Indianapolis is nearly twice what the Indianapolis Thrive Plan indicates.)<sup>26</sup>

City	Annual Spending on Parks (Dollars per Person)
St. Louis	\$ 478
Raleigh NC	258
Chicago	173
Milwaukee	149
Kansas City	121
Pittsburgh	99
Fort Wayne	87
Baltimore	68
Memphis	52
Indianapolis	*50
Toledo	41
Detroit	29

\* The City’s own accounting indicates that spending on parks is only \$26 per person which would put Indianapolis at the bottom of this list.

<sup>24</sup> Tom Gallagher, Indianapolis business Journal URBAN DESIGN: Our parks get a bad rap—even though spending lags. July 20, 2017

<https://www.ibj.com/articles/64692-urban-design-our-parks-get-a-bad-rapeven-though-spending-lags>

<sup>25</sup> Tom Gallagher, Indianapolis business Journal URBAN DESIGN: Our parks get a bad rap—even though spending lags. July 20, 2017

<https://www.ibj.com/articles/64692-urban-design-our-parks-get-a-bad-rapeven-though-spending-lags>

<sup>26</sup> [https://www.tpl.org/sites/default/files/files\\_upload/CityParkFacts\\_2017.4\\_7\\_17.FIN\\_LO.pdf](https://www.tpl.org/sites/default/files/files_upload/CityParkFacts_2017.4_7_17.FIN_LO.pdf)



## Preserving Unprotected Urban Forests is Essential to Achieve Adequate Tree Cover

This report focuses primarily on urban forests that are not currently protected as parks. It provides a foundation that will help Indianapolis neighborhoods and landowners protect their existing tree canopy through a variety of conservation strategies that will, in turn, improve environmental quality, and the health and quality of life of residents. In this report, we examine some of the many benefits that forests provide, especially for socially vulnerable and underserved communities. We also explore some of the unique challenges urban forests face. This report is intended to inform decision-making to help Indianapolis protect and conserve its urban forests, and in turn, increase the City's resilience, provide a better quality of life for residents, and a more enjoyable experience for visitors as well.

Marion County's current tree canopy averages 33% across the county.<sup>27</sup> A goal of 40% canopy cover is recommended by the Indiana Department of Natural Resources, consistent with American Forests recommendations for cities east of the Mississippi.<sup>28</sup> To achieve this 40% tree canopy in Indianapolis, 2.4 million trees would need to be planted, each with a 20-foot canopy - an impractical, costly feat.<sup>29</sup> <sup>30</sup> This feat will become even more unrealistic if the City's existing canopy is continually lost by destruction of remaining forests from development within the County. In addition, the Davey Tree Management Plan determined that, in theory, any given street should have space for 1 tree every 50 feet along each side of the street, or 212 trees per mile but there are currently only 48 trees per street mile on average. This suggests that there is room for an additional 618,771 street trees in Indianapolis. The City of Indianapolis estimates that it plants approximately 2,250 trees per year. With a current total of 167,800 planting sites along the street right of ways, it would take approximately 75 years for the City to plant all of these sites or 59 years for the City to reach the recommended stocking level of 90%.<sup>31</sup>

Keep Indianapolis Beautiful (KIB) has identified and mapped many plantable sites across the City for establishment of new trees.<sup>32</sup> KIB and other organizations are very actively engaged in tree planting. However, tree planting is expensive (about \$155 per tree),<sup>33</sup> and young trees require care and watering during the first few years, adding to the expense. In addition, they take decades to reach maturity. This emphasizes the importance of protecting the trees we have - our existing urban forests.

In spite of all the benefits that trees provide and official recognition of those benefits in the Thrive Indianapolis plan and elsewhere, the City has few provisions to protect existing tree canopy. The City's Heritage Tree Ordinance protects several species of trees larger than 18 inches diameter at breast height from being removed in proposed developments,<sup>34</sup> but allows any private land owner to clear all trees on their land regardless of size or species as long as the owner is not proposing a development on the land. And even where there are provisions,

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<sup>27</sup> Thrive Indianapolis, p 59. <https://www.thriveindianapolis.com/>

<sup>28</sup> <https://secure.in.gov/dnr/forestry/files/fo-FinalNUTCSummaryRep.pdf>

<sup>29</sup> <https://secure.in.gov/dnr/forestry/files/fo-FinalNUTCSummaryRep.pdf>

<sup>30</sup> [https://www.itreetools.org/documents/175/Sustainable\\_Urban\\_Forest\\_Guide\\_14Nov2016.pdf](https://www.itreetools.org/documents/175/Sustainable_Urban_Forest_Guide_14Nov2016.pdf) includes chart showing urban tree canopy and tree canopy goals for many US cities

<sup>31</sup> Davey Resource Group. 2016. Tree Management Plan: City of Indianapolis, prepared for the Department of Public Works. Copy available upon request from IFA.

<sup>32</sup> <https://pg-cloud.com/KIB/>

<sup>33</sup> <https://urbanforestry.indiana.edu/doc/publications/2015-kib-report.pdf>

<sup>34</sup> Indianapolis municipal code TITLE III - PUBLIC HEALTH AND WELFARE Chapter 744-502 and 744-503.

implementation can be problematic. In recent years, some of the most important wooded areas have been threatened with development. Two high profile examples, Crown Hill North Woods and Haverstick Woods, had very different outcomes. The 62-acre Crown Hill North Woods contains a 15-acre remnant forest that was a standing forest in the 1940's when the first aerial photos were taken. It was threatened with development which was approved and moving forward but remains standing three years later due to a large public outcry, while much of the 14-acre Haverstick Woods, protected by a tree preservation plan that followed the Marion County Comprehensive Land Use Plan, has now been cleared.<sup>35</sup> Details from these examples are included in the case studies section of the appendix. It will take at least 60 years to replace any mature trees removed today. If Indianapolis is going to become carbon neutral and more resilient as outlined in the Thrive Indianapolis plan, protection of our existing tree canopy is essential.

### **Urban Forest Vulnerability and Resilience:**

Urban forest vulnerability has been defined as "...the likelihood of decline in ecosystem service supply and its associated benefits for human populations, urban infrastructure, and biodiversity."<sup>36</sup> According to the Climate Hazard and Social Vulnerability Analysis performed by the City<sup>37</sup> in conjunction with the Thrive Indianapolis plan, "A vibrant, strong, and successful community includes equitable access to amenities, transportation, services, and environmental resources, and is resilient and prepared to address the challenges of the 21st century".<sup>38</sup> Resilience can be seen as the opposite of vulnerability. It is the ability of a system to withstand stresses - the capacity to absorb, utilize or even benefit from perturbations.<sup>39</sup> Vulnerability and resilience reflect both the biological responses and the human factors that may be economic, organizational, technical and political.

The following forest vulnerability assessment is partly a literature review and synthesis of existing information, and partly modeling and prioritization.<sup>40 41</sup> We begin by summarizing current conditions, then outline projected impacts and analyze all of Indy's existing urban forests to prioritize the most hard-working forests among them that will address these impacts based on the benefits they provide.

There is a growing recognition that urban forests are key to the resilience of cities.<sup>42</sup> Urban forests are subject to stresses and disturbances not seen in other forests because cities are densely populated, with complex ownership patterns and high competition for space, and subject to changing land use over time. Urban forest vulnerability assessment increases our understanding of these forests and their responses to likely impacts in the coming decades.

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<sup>35</sup><https://www.indystar.com/story/news/environment/2020/05/10/judge-sides-nora-residents-development-haverstick-woods/3069293001/>

<sup>36</sup> [https://www.fs.fed.us/nrs/pubs/jrnl/2017/nrs\\_2017\\_steenberg\\_001.pdf](https://www.fs.fed.us/nrs/pubs/jrnl/2017/nrs_2017_steenberg_001.pdf), p. 2

<sup>37</sup> Climate Hazard and Social Vulnerability Assessment, prepared for the City of Indianapolis by Arcadis U.S. Inc., December 2018

<sup>38</sup> Climate Hazard and Social Vulnerability Assessment, prepared for the City of Indianapolis by Arcadis U.S. Inc., December 2018 p. 7

<sup>39</sup> [https://serc.carleton.edu/integrate/teaching\\_materials/food\\_supply/student\\_materials/1059](https://serc.carleton.edu/integrate/teaching_materials/food_supply/student_materials/1059)

<sup>40</sup> <https://www.fs.usda.gov/sites/default/files/ccassessments.pdf>

<sup>41</sup> <https://www.fs.usda.gov/sites/default/files/ccassessments.pdf>

<sup>42</sup> Climate Hazard and Social Vulnerability Assessment, prepared for the City of Indianapolis by Arcadis U.S. Inc., December 2018

Anticipated impacts include population growth, development pressure, and climate change. A vulnerability assessment is not an endpoint, but a source of information to incorporate into planning and decision-making to make Indianapolis a better city.<sup>43</sup>

Because urban forests exist in areas with high human population density, they are socio-ecological complexes and it is critical to study urban forests within the context of the human community.<sup>44</sup> This urban forest vulnerability assessment examines the intersection between social vulnerability and forest vulnerability, by considering factors that influence the resilience of the people and the natural environment. This assessment builds upon the foundation provided by the earlier sections of this report and work done by the City of Indianapolis and other stakeholders to help the City adapt to climate change. We especially rely on the Thrive Indianapolis Plan, the Social Vulnerability Analysis that was developed in conjunction with the Thrive plan, the White River Vision Plan and the Purdue Climate Change Study. Information synthesized from these sources can frame a practical focus on preserving urban forests in Indianapolis.

In any city, some people are more vulnerable than others due to socio-economic status, age, geography, disability, language barriers or other factors. While changes in climate and precipitation may seem uniform throughout Indianapolis, exposure to these changes, as well as their impacts on specific communities, is uneven. Certain populations may have more difficulty coping with specific conditions than others. For example, older individuals (65 years and older), may have a more difficult time responding to extreme heat if their mobility is limited or they have underlying health conditions.

Lower income communities can be more vulnerable and exposed to impacts from severe weather and other natural disasters. While large scale severe natural disasters may be highly visible, smaller scale impacts from storms and floods can be disastrous for low income communities too, especially if there are repeated impacts. These communities may sustain disproportionately more significant damage relative to their assets that can result in a poverty trap in which a first disaster reduces the community's ability to cope with subsequent disasters.<sup>45</sup> According to the Indianapolis Hazard Assessment and Vulnerability Study, "Breaking this cycle and building resilience through access to resources and providing necessary infrastructure is critical for reducing disaster impacts and losses, as well as ensuring that communities of all income and socioeconomic backgrounds can continue to grow, thrive, and prosper."<sup>46</sup>

After Hurricane Katrina hit the gulf coast in 2005, the National Centers for Disease Control (CDC) developed a social vulnerability index (SVI) based on a variety of factors including population density, age, income and education levels, as well as housing and transportation variables.<sup>47</sup> In Figure 2, the social vulnerability index developed by the CDC for Indianapolis is

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<sup>43</sup> <https://www.fs.usda.gov/sites/default/files/ccassessments.pdf>

<sup>44</sup> Steenberg et al, Conceptual [https://www.fs.fed.us/nrs/pubs/jrnl/2017/nrs\\_2017\\_steenberg\\_001.pdf](https://www.fs.fed.us/nrs/pubs/jrnl/2017/nrs_2017_steenberg_001.pdf)

<sup>45</sup> Climate Hazard and Social Vulnerability Assessment, prepared for the City of Indianapolis by Arcadis U.S. Inc., December 2018 p. 7

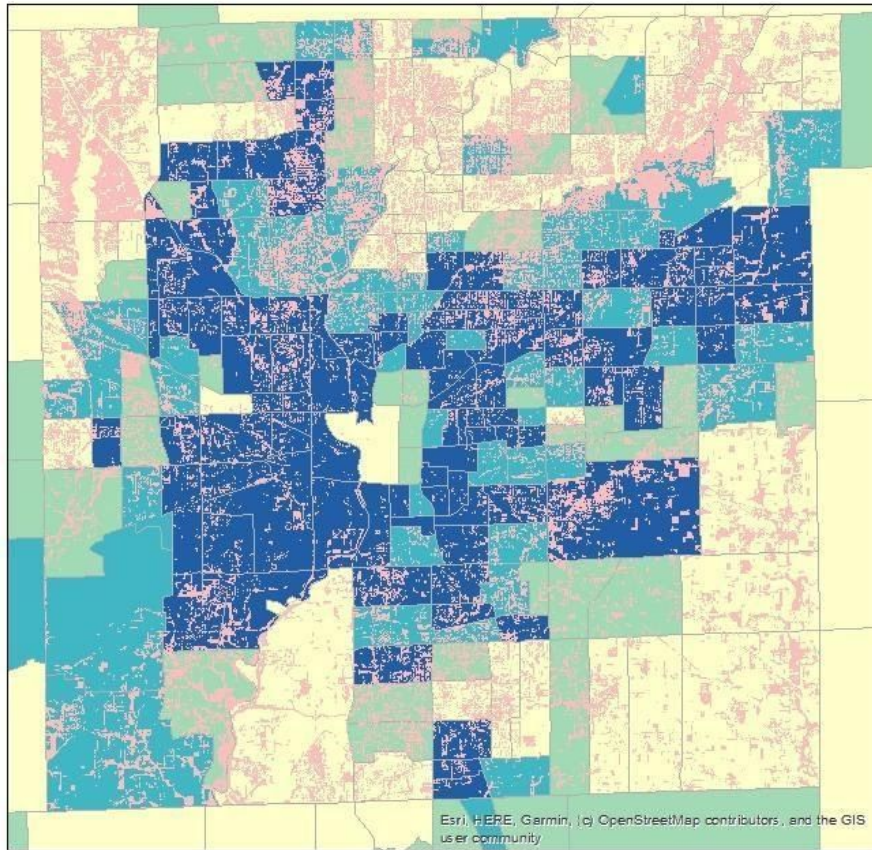
<sup>46</sup> Climate Hazard and Social Vulnerability Assessment, prepared for the City of Indianapolis by Arcadis U.S. Inc., December 2018

<sup>47</sup> Journal of Homeland Security and Emergency Management A Social Vulnerability Index for Disaster Management Barry E. Flanagan, CDC/ATSDR Edward W. Gregory, CDC/ATSDR Elaine J. Hallisey, CDC/ATSDR Janet L. Heitgerd,

shown with an overlay revealing the City's forest canopy. The darker blue shades indicate more vulnerable populations, while the urban forests are shown in pink. This map demonstrates that the most vulnerable areas still have some forest cover that can contribute to the community resilience. Yet, forests in areas with vulnerable human populations may be vulnerable too, in part because the most vulnerable populations tend to occur in areas that are likely to have high exposure to impacts such as air pollution, heat, or flooding. And vulnerable people may not recognize forest stewardship as a priority or be in position to undertake this stewardship even if they do recognize its importance.

Figure 2: Forest Canopy map overlaid on CDC Social Vulnerability Index.

## Canopy overlaid on CDC SVI



0 0.75 1.5 3 4.5 6 Miles

ParcelWithSegDataV1.0

### Overall 2014 Tracts

#### RPL\_THEMES

- 0 - 0.25 | Lowest Vulnerability
- 0.2501 - 0.5
- 0.5001 - 0.75
- 0.7501 - 1 | Highest Vulnerability
- Data Unavailable

### Current conditions and Projected Impacts

Adapting to climate change is likely to be one of the biggest challenges Indianapolis will face in the coming decades. Impacts from climate change are already apparent. According to *Indiana's Past & Future Climate: A Report from the Indiana Climate Change Impacts Assessment*, Indiana's statewide annual average temperature has risen by 1.2 °F since the 1950s.<sup>48</sup> The number of cold days (less than 32°F) are declining and the number of hot days (greater than 90°F) are increasing. Similarly, the frequency, intensity, and duration of precipitation events are changing and these trends are expected to continue.<sup>49 50</sup>

### *Temperature*

The Climate Hazard and Social Vulnerability Assessment for Indianapolis (completed in support of the Thrive Plan) indicates that average temperatures in the City have risen markedly more than the state average with city temperatures rising by 2.2°F between 1951 and 2014. Average seasonal temperatures have increased in all seasons, with spring experiencing the greatest increase of 3.1°F from 1951 to 2014. Average annual temperatures in Indianapolis are projected to increase further by 3.0 to 7.0°F at mid-century with “business as usual” emissions.<sup>51</sup>

Days with temperature at or above 90°F are very common now with multiple occurrences every year. Most years on record have two to four consecutive days over 95°F with some heat waves lasting five to seven consecutive days. The number of hot days with temperatures greater than 90°F is expected to increase.<sup>52</sup> Models indicate that by 2050 Indiana will experience 32-56 days per year over 90°F and 10-15 days per year over 95°F. Beyond a greater number of high temperature days, models suggest that longer heat waves could occur. Summer nighttime low temperatures will also continue to increase, making it more difficult to cool off at night during extended heat events. Table 2 summarizes historical data and projections for mean high temperatures by decade and days above 90 F.<sup>53 54</sup>

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<sup>48</sup>Climate Hazard and Social Vulnerability Assessment, prepared for the City of Indianapolis by Arcadis U.S. Inc., December 2018

<sup>49</sup> Climate Hazard and Social Vulnerability Assessment, prepared for the City of Indianapolis by Arcadis U.S. Inc., December 2018

<sup>50</sup> Indiana's Past & Future Climate: A Report from the Indiana Climate Change Impacts Assessment  
<https://docs.lib.purdue.edu/cgi/viewcontent.cgi?article=1000&context=climatetr>

<sup>51</sup> Climate Hazard and Social Vulnerability Assessment, prepared for the City of Indianapolis by Arcadis U.S. Inc., December 2018

<sup>52</sup> Projections are from Climate Hazard and Social Vulnerability Assessment, prepared for the City of Indianapolis by Arcadis U.S. Inc., December 2018

<sup>53</sup> Historical data are from

<https://www.currentresults.com/Weather-Decades/USA/IN/Indianapolis/temperature-average-by-decade-indianapolis.php> and

<https://www.currentresults.com/Yearly-Weather/USA/IN/Indianapolis/extreme-annual-indianapolis-high-temperature.php>

<sup>54</sup> Projections are from Climate Hazard and Social Vulnerability Assessment, prepared for the City of Indianapolis by Arcadis U.S. Inc., December 2018

**Table 2: Summary of High Temperatures by Decade**

Decade	Mean Highest Temp	Days above 90 F
1950s	96.3	23
1960s	94.6	17
1970s	94	13
1980s	95.6	22
1990s	95.8	18
2000s	93.1	14
2010s	96.1	27
2020s projected	101	n.a.
2050s projected	104	56

Winters are also becoming less severe. The average daily minimum temperature is increasing.<sup>55</sup> The coldest night of the winter is projected to rise by about 6 F by mid-century compared to the average over the last half century.<sup>56</sup>

**Table 3: Low Temperature for Each Decade**

	Low Temp	Days below 32°F
2010s	45.0	107
2000s	44.4	104
1990s	43.9	106
1980s	42.7	115
1970s	42.4	119
1960s	41.7	122
1950s	42.5	123

<sup>55</sup><https://www.currentresults.com/Weather-Decades/USA/IN/Indianapolis/temperature-average-by-decade-indianapolis.php>

<sup>56</sup> <https://docs.lib.purdue.edu/cgi/viewcontent.cgi?article=1000&context=climatetr>

Table 3 shows the average daily minimum temperatures for each decade since the 1950s and the total number of days per year when the temperature in Indianapolis dropped below freezing, 32°F.<sup>57</sup> The frequency of cold days below 32°F and very cold days below 10°F has declined since the 1950s. From 1981-2010, temperatures at or below 10°F occurred on average about 14 days per year. Events of two to five consecutive days at or below 10°F, with cold spells lasting 6 to 18 days still occur occasionally, but models project fewer days at or below 10°F and fewer occurrences of two to five consecutive days at or below 10°F by 2050.<sup>58</sup> Warmer temperatures in winter may lead to the spread of invasive flora and fauna species, and pests like mosquitoes and ticks, that would have historically been killed off by cold temperatures.<sup>59</sup>

### *Precipitation*

Total annual precipitation has increased in Indianapolis by 7.0 inches (17%) from 1951 through 2014. An increase in precipitation was observed in spring, summer, and fall, while the winter shows a very small decrease in precipitation (-0.1 inch). Fall shows the greatest increase with an additional 1.6 inches in precipitation. These trends are likely to continue.<sup>60</sup>

The frequency and intensity of severe storms has also increased. This trend will likely continue as the effects of climate change become more pronounced. The amount of precipitation falling in the heaviest 1% of storms increased by 37% in the Midwest from 1958 to 2012.<sup>61</sup> Central Indiana is projected to experience one to three more days of heavy precipitation (events greater than 1.25 inches) per year. Stronger and more extreme precipitation events will be more likely to overwhelm stormwater infrastructure. Flooding results when rainfall volumes exceed the capacity of natural and built infrastructure to handle precipitation, so these changes may lead to more flooding and flooding in places that did not previously flood. This makes the conservation of existing forests as well as initiatives to reforest additional areas more cost effective and important to pursue as public policy objectives in the Indianapolis urban area than ever before.

### *Species Shifts*

Historically Central Indiana has had a frost free growing season that is 175 days long from April 24 to Oct 15. By 2050 it is predicted that the growing season will be 208 days from April 8 to Nov. 1.<sup>62</sup> These changes may shift the ranges of many species and impact the urban forest in a variety of ways. Warmer temperatures will favor some tree species and disadvantage others. The range of many pests may be affected too. The Indianapolis Tree Management<sup>63</sup> plan includes an inventory of all trees in the public right of ways along Indianapolis streets (whether planted or not). In Figure 3 below, the tree species listed in the Tree Management Plan are shown in blue as a percentage of the total population, while Forest Inventory Analysis data compiled from test plots across the state are shown in red.

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<sup>57</sup><https://www.currentresults.com/Weather-Decades/USA/IN/Indianapolis/temperature-average-by-decade-indianapolis.php>

<sup>58</sup> <https://www.currentresults.com/Weather/Indiana/Places/indianapolis-temperatures-by-month-average.php>

<sup>59</sup> Climate Hazard and Social Vulnerability Assessment, prepared for the City of Indianapolis by Arcadis U.S. Inc., December 2018

<sup>60</sup> Climate Hazard and Social Vulnerability Assessment, prepared for the City of Indianapolis by Arcadis U.S. Inc., December 2018

<sup>61</sup> SRVA iv

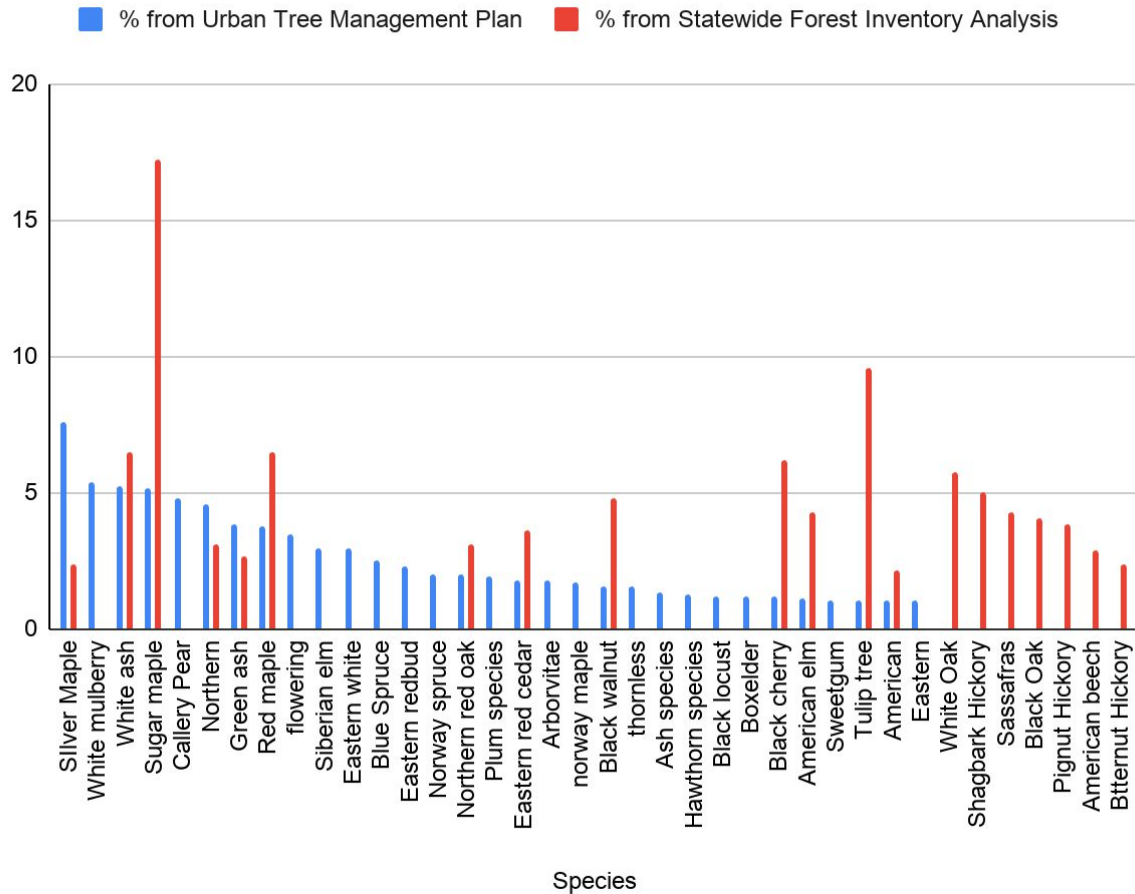
<sup>62</sup> [https://ag.purdue.edu/indianaclimate/wp-content/uploads/2019/01/ClimateFacts\\_Marion\\_03262018\\_reduced.pdf](https://ag.purdue.edu/indianaclimate/wp-content/uploads/2019/01/ClimateFacts_Marion_03262018_reduced.pdf)

<sup>63</sup> Davey Resource Group. 2016. Tree Management Plan: City of Indianapolis, prepared for the Department of Public Works. Copy available upon request from IFA.



**Figure 3: Comparing Indianapolis Urban Forests with All Forests in Indiana**

### Comparing Urban Forests with other Forests



In Figure 3, the comparison between the urban forest inventory and the statewide Forest Inventory Analysis data drawn from test plots across the state shows how the street tree population has a very different species composition than forests in non-urban settings. The Tree Management Plan indicates that the street tree population has 92 genera and 249 species represented, an acceptable level of diversity based on the recommendation that no single species represents more than 10% of the total. It is also recommended that no single genus comprise more than 20% of the population. Maple species actually represent 21% of the population, so the Tree Management Plan suggests that future plantings focus on species outside the maple family.<sup>64</sup> The diversity of the urban forest, including the presence of 215 species in the “Other” category (not included in Figure 3), may contribute to resilience to pests and other stresses, even though some of those tree species may be non-native. Trees such as the ash species that occupy significant percentages of the population but are suffering high mortality from emerald ash borer could be readily replaced by numerous other species.

<sup>64</sup> Davey Resource Group. 2016. Tree Management Plan: City of Indianapolis, prepared for the Department of Public Works. Copy available upon request from IFA.

The Tree Management Plan also assigns an Importance Value to each species reflecting the volume of the canopy and the amount of rainfall interception attributable to each species. Their assessment found that not only are silver maple trees dominating the population in terms of number of trees, but that its contribution to the overall canopy is even larger than its contribution to tree numbers. This indicates that the loss of the silver maple population would be more economically detrimental than its percentage of the population leads us to believe. The second highest importance value in the canopy was for sugar maple (5.95), followed by northern hackberry (5.91) and white mulberry (5.84). The abundance of northern hackberry on public right-of-ways is not as great as white mulberry, but northern hackberry's importance value is greater than white mulberry. The primary species represented in the Indianapolis Tree Management Plan are listed in the Appendix along with their vulnerability as reported by the Morton arboretum.<sup>65</sup>

### *Summary of Expected Impacts*

As the climate changes, precipitation is likely to become more erratic. As the total precipitation increases and storm events become more intense, it will become increasingly likely that precipitation will exceed the capacity of the sewer infrastructure, leading to flooding. Increased development will increase the amount of impervious cover and exacerbate this effect on downstream communities that will likely be economically poor neighborhoods in many instances.<sup>66</sup>

- Average air temperature in Indianapolis has increased by 2.2°F since the 1950s.<sup>67</sup>
- Average air temperature is expected to rise 3°F to 7°F by 2050.<sup>68</sup>
- Total annual precipitation has increased by 16.1% since 1950.<sup>69</sup>
- The total volume of rainfall in extreme events has increased 4% since 1981.<sup>70</sup>
- Total annual precipitation will likely increase in the future, though types of precipitation will vary (i.e., winter precipitation more in the form of rain).<sup>71</sup>
- Species shifts are expected but difficult to predict. Tree species diversity should help Indianapolis urban forests be resilient.<sup>72</sup>
- Increased Warmer temperatures in winter may lead to the spread of invasive flora and fauna species, and pests like mosquitoes and ticks, that would have historically been killed off by cold temperatures.<sup>73</sup>

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<sup>65</sup>Chicago Wilderness region urban forest vulnerability assessment and synthesis: a report from the Urban Forestry Climate Change Response Framework Chicago Wilderness pilot project <https://www.nrs.fs.fed.us/pubs/54128>

<sup>66</sup> Climate Hazard and Social Vulnerability Assessment, prepared for the City of Indianapolis by Arcadis U.S. Inc., December 2018

<sup>67</sup> Climate Hazard and Social Vulnerability Assessment, prepared for the City of Indianapolis by Arcadis U.S. Inc., December 2018

<sup>68</sup> Climate Hazard and Social Vulnerability Assessment, prepared for the City of Indianapolis by Arcadis U.S. Inc., December 2018

<sup>69</sup> Climate Hazard and Social Vulnerability Assessment, prepared for the City of Indianapolis by Arcadis U.S. Inc., December 2018

<sup>70</sup> Climate Hazard and Social Vulnerability Assessment, prepared for the City of Indianapolis by Arcadis U.S. Inc., December 2018

<sup>71</sup> Climate Hazard and Social Vulnerability Assessment, prepared for the City of Indianapolis by Arcadis U.S. Inc., December 2018

<sup>72</sup> Davey Resource Group. 2016. Tree Management Plan: City of Indianapolis, prepared for the Department of Public Works. Copy available upon request from IFA.

<sup>73</sup> Climate Hazard and Social Vulnerability Assessment, prepared for the City of Indianapolis by Arcadis U.S. Inc., December 2018

## Conserving Urban Forests to Address these Vulnerabilities

This report examines all the unprotected wooded areas above one acre in size in Indianapolis and analyzes and ranks the benefits that these forests provide. This scoring and prioritization is designed to help Indianapolis and its residents make more informed decisions about the importance of urban forests within the City. In the process, decision-makers can help the City achieve the goal of the Thrive Indianapolis plan to make Indianapolis more resilient in the face of climate change.

After taking an in-depth look at the value of Indianapolis forests, we examine how they can be protected. Conservation opportunities and funding strategies were identified by The Conservation Fund (the Fund), a national organization that has helped cities and urban communities throughout America develop strategies for conserving forests and greenspaces. The Fund worked with the Central Indiana Land Trust, Inc. (CILTI) to draft the report, “Greening the Crossroads, A Green Infrastructure Vision for Central Indiana” (2010)<sup>74</sup> which laid out a road map for conservation focus areas of the Land Trust for Central Indiana.<sup>75</sup>

This report’s mapping, scoring and prioritizing of existing forests to conserve in the City as of 2020 will establish a baseline for monitoring progress towards the goals of the CILTI Greening the Crossroads road map, the Thrive Indianapolis Plan, and the White River Vision Plan over time.

IFA first had to identify the forests within Indianapolis. With assistance from a technical committee of experts from the Indiana University Purdue University Indianapolis (IUPUI) Department of Geography and The Polis Center at IUPUI, Morton Arboretum, Keep Indianapolis Beautiful (KIB), The Nature Conservancy, and Dr. Laura Hare Charitable Trust, remotely sensed data (from satellite imagery) was used to map the tree canopy of Indianapolis and identify forest segments. A forest segment refers to continuous canopy cover over an area not bisected by roads or buildings. Using LiDAR derived canopy data from 2013 created by the University of Vermont’s Spatial Analytics Lab and made available to IFA from KIB, more than 4,000 canopy segments larger than one acre were identified and depicted on a map of Marion County without regard to property boundaries or ownership. Some forest segments have a single owner while others have many.

We created a GIS data layer with all forest segments and then scored each segment for environmental, ecological, and social variables, using a standardized scoring system for each attribute to compare segments to one another, as shown in Figure 4 (which includes protected forests in public parks). Forests protected in the City’s park system or Fort Benjamin Harrison State Park were removed from the pool of segments to be ranked. IFA then developed a model to prioritize these unprotected forests based on input from the FFI steering committee and other members of the public. IFA ranked forest segments based on their relative value in

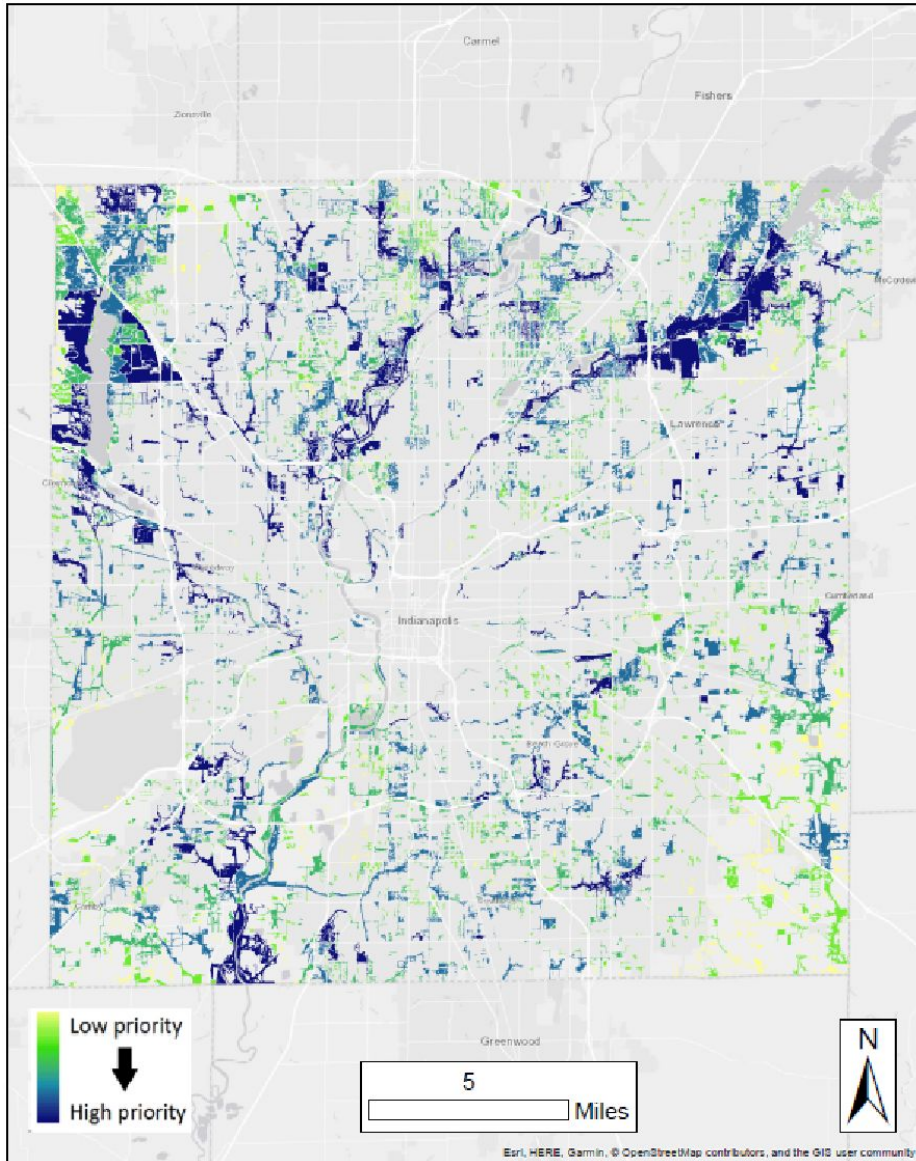
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<sup>74</sup> <https://www.conservationfund.org/projects/greening-the-crossroads-central-indiana>

<sup>75</sup> <https://www.conservationfund.org/projects/green-infrastructure-plan-for-central-indiana>

providing environmental, ecological and social benefits to the City. These three categories of benefits, and the factors within each category, were ranked and weighted in order of importance by the Steering Committee.

**Figure 4: Marion County Forest Prioritization**



## Urban Forest Prioritization

An analysis based on remotely sensed data has some limitations. For example, the data are not detailed enough to provide information about species composition or forest stand structure. The weighting process based on remotely sensed data is also difficult as those surveyed varied greatly in their background knowledge about remotely sensed data and its limitations. Despite some inherent limitations, this prioritization process was used to identify the forest segments that are providing the most benefits for the community across an array of parameters to determine which forests are most important and why, and develop conservation strategies for their protection.<sup>76</sup>

### Environmental Benefits

Environmental benefits is a term that encompasses those ecosystem services that the City or its residents would otherwise pay for. They can be thought of as economic benefits that will help the City become more resilient in the face of impacts from climate change and other impacts. The environmental benefits of riparian (streamside) corridors are a key part of the White River Vision Plan. Riparian forests are extremely important for minimizing streambank erosion and stream meandering. In addition, headwaters forests that drain to tributaries of the White River slow down precipitation and reduce peak flows, erosion and flooding. In the headwaters especially, rainwater absorption is a function of canopy volume. Other environmental services include moderating temperature and improving air quality.

Table 4 outlines the parameters used to score environmental benefits, and Figure 5 identifies the locations of the top 100 forests and ranks them from 1 to 100 (with 1 being most important) in providing those benefits.

**Table 4: Environmental Benefit Features Used to Rank Forests**

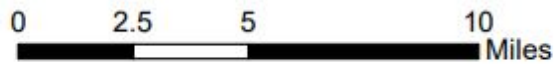
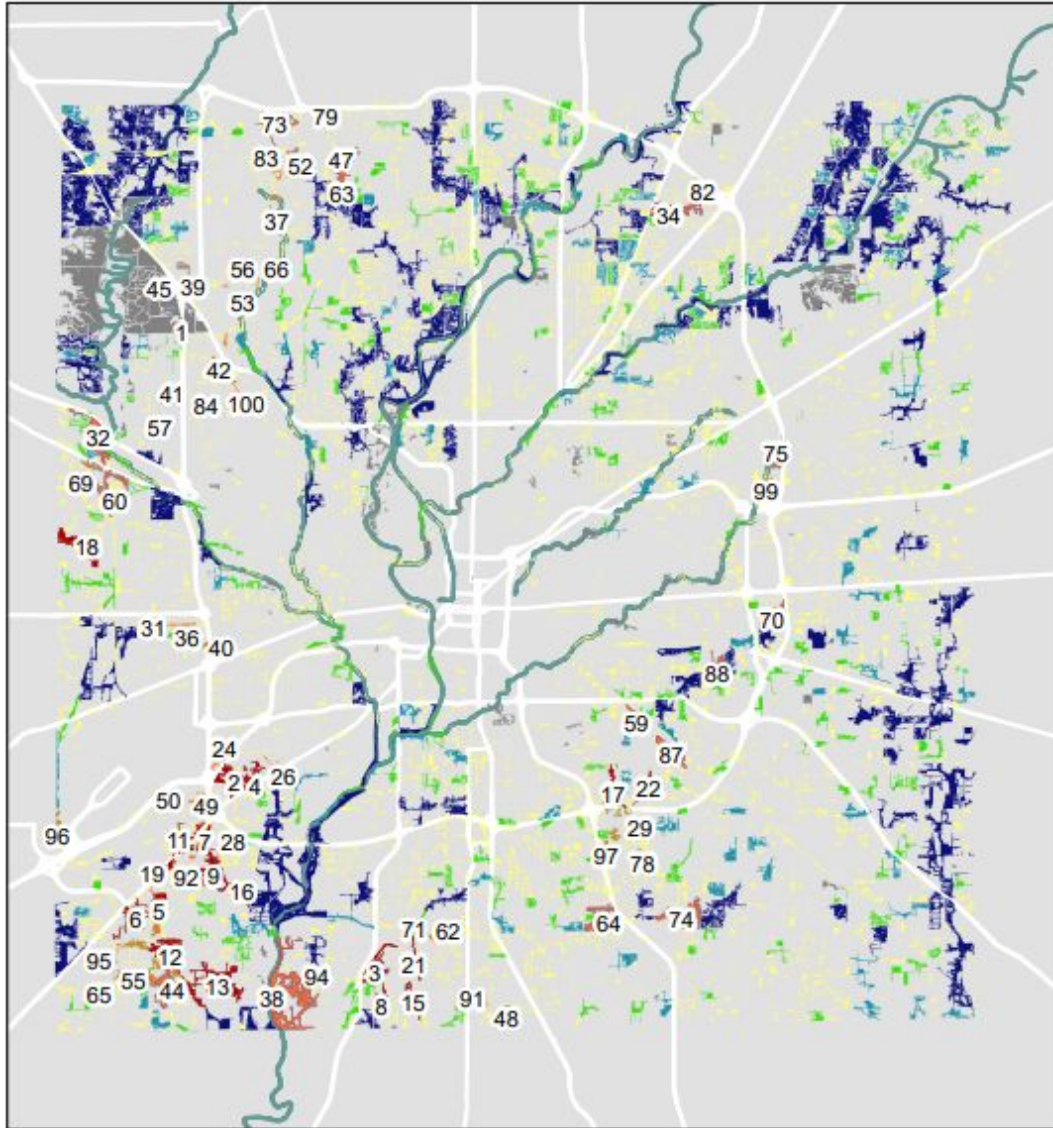
<b>Environmental Benefits 32%</b>
Riparian area (x1,000)
Canopy Volume - Rainwater Interception (x1,000)
Headwaters
Surface Temperature
Air Quality

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<sup>76</sup> Messer, K.D. and William L. Allen III. 2018. The Science of Strategic Conservation (Protecting more with Less), Cambridge University Press.

Figure 5: Environmental Benefits

### Priority Forests Environmental



Environmental benefits mostly reflect water quality impacts such as interception of rainwater, protection of stream corridors and erosion control in headwater streams, although surface temperatures and air quality are also important factors. The forests providing the highest environmental benefits are clustered in the southwestern quadrant of the City because this area is in the 100 year flood plain. There are also clusters near Eagle Creek and Little Eagle Creek in the northern part of the City and Pleasant Run and Lick Creek in the southeastern quadrant. The array of high priority forests for environmental benefits demonstrates the potential value of establishing a system of forest preserves along riparian corridors to maximize those benefits, an idea supported by the White River Plan<sup>77</sup> and other City plans.

### *Stormwater and flooding*

Flooding is one of the most common and pervasive impacts the City experiences. Each year Indianapolis has numerous localized flooding events that endanger lives and cause property damage, health impacts, economic disruptions and other impacts. In some years, larger floods inundated larger portions of Indianapolis at one time. Flooding generally occurs most often in low lying areas near rivers, creeks, drainage ditches and other water bodies. Flooding can be exacerbated by impervious surfaces such as pavement, and by soils with poor infiltration capacity. About 8% of the Indianapolis land area is in a floodplain, containing about 6.5 billion dollars worth of real estate.

Indianapolis was designed with combined sewers to carry away excess stormwater along with sewage. The performance, age, condition, capacity and design of the City's stormwater infrastructure are important factors that influence flooding potential. The Climate Hazard and Vulnerability study performed by the City provides a map showing the age of the sewer/stormwater infrastructure and the history of sewer complaints.<sup>78</sup> Accordingly, forests with high canopy volumes as well as their locations in floodplains and headwater areas will gain higher rankings in absorbing precipitation and controlling and absorbing flooding.

### *Urban Heat Island Effects*

When solar radiation is absorbed by the City's hard surfaces, e.g. rooftops, concrete, asphalt, etc., they absorb heat. This phenomenon, called the urban heat island effect, can cause densely built up urban sites to be warmer than surrounding areas. Trees help prevent this effect by intercepting and using the solar energy to convert carbon dioxide into oxygen. This reduces temperatures and energy consumption by households and businesses. In so doing, trees also sequester carbon and help mitigate the pollution and climate change caused by greenhouse gas emissions into the atmosphere.

**According to the Environmental Protection Agency, surfaces in shade can be up to 45 degrees cooler than those in full sun.<sup>79</sup> And air temperatures in areas within a half mile of a park or forest can be 6 degrees cooler than areas beyond that range.<sup>80</sup>** One of the goals articulated in the Thrive Indianapolis plan is to "(p)lant 30,000 additional native trees by 2025 to increase

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<sup>77</sup> White River Vision Plan [https://mywhiteriver.com/wp-content/uploads/2020/03/WRVP-Report\\_Final\\_Web.pdf](https://mywhiteriver.com/wp-content/uploads/2020/03/WRVP-Report_Final_Web.pdf) p 69.

<sup>78</sup> Indianapolis Climate Hazard and Social Vulnerability Assessment. Arcadis. Dec. 2018 City of Indianapolis Office of Sustainability.

<sup>79</sup> <https://www.epa.gov/heatislands/using-trees-and-vegetation-reduce-heat-islands>

<sup>80</sup> [https://www.tpl.org/sites/default/files/The-Heat-is-on\\_A-Trust-for-Public-Land\\_special-report.pdf](https://www.tpl.org/sites/default/files/The-Heat-is-on_A-Trust-for-Public-Land_special-report.pdf)

canopy, reduce runoff and mitigate against the urban heat island, particularly in those neighborhoods in most need.”<sup>81 82</sup>

**Figure 6: Urban Heat Island Effects**

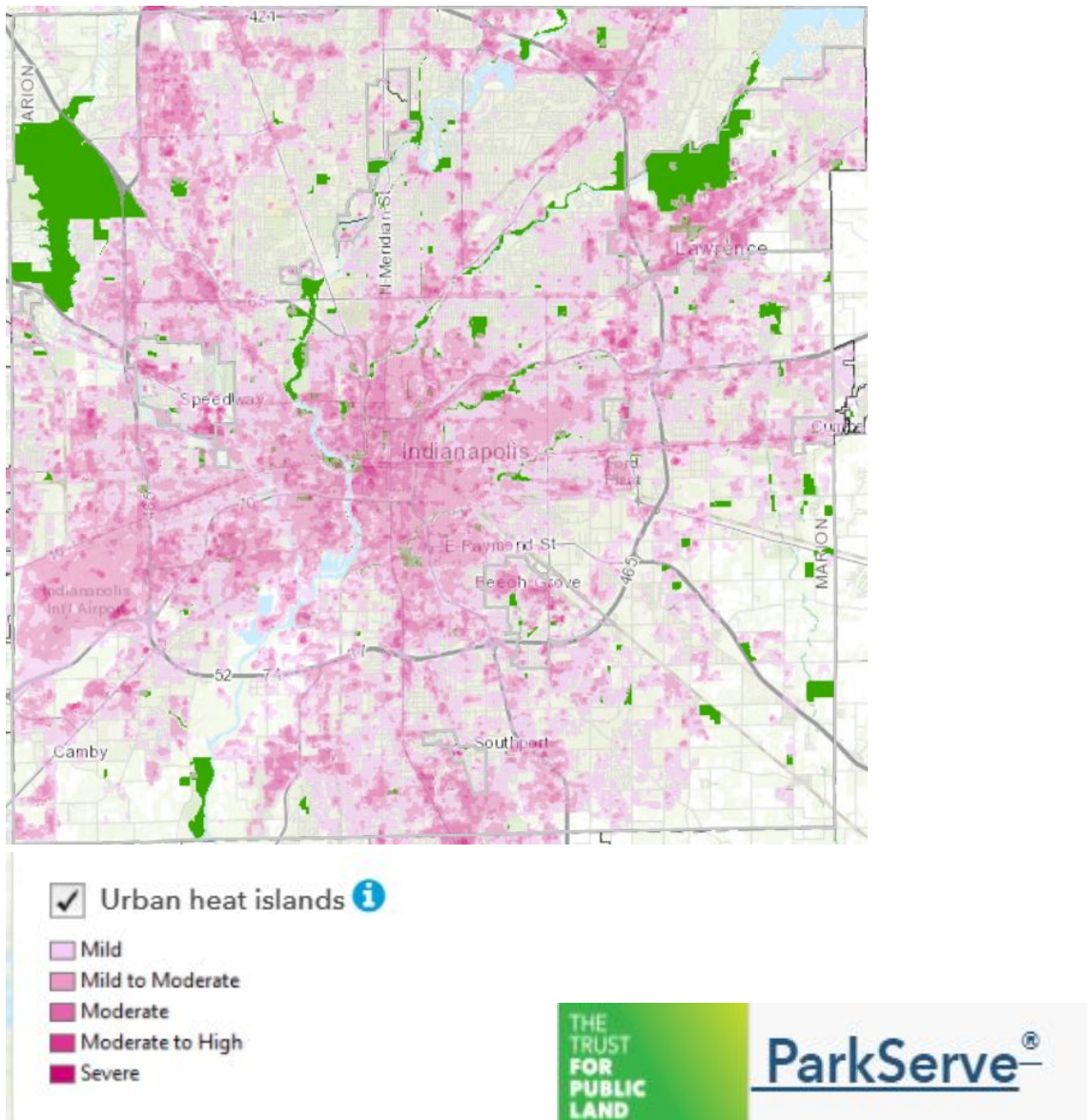


Figure 6 from the Trust for Public Land identifies areas in Indianapolis most impacted by heat. These “hot spots” may be the places where preservation of existing tree canopy in addition to planting new trees is critical to mitigate the worst heat island impacts. Figure 6 shows average urban air temperatures in gradations of pink color and demonstrates that some of the hottest parts of the City, portrayed in the darker pink colors, are in the most densely built areas

<sup>81</sup> <https://www.thriveindianapolis.com/>

<sup>82</sup> Indianapolis Climate Hazard and Social Vulnerability Assessment. Arcadis. Dec. 2018 City of Indianapolis Office of Sustainability.



including the city center, shopping malls and commercial corridors along major streets and the airport.

Ecological benefits

Ecological benefits are those attributes that primarily provide wildlife habitat value and forest health. Remnant forests that were present on the landscape when aerial photographs were taken in 1941, and are currently unprotected, were given high weighting because they were deemed to be the oldest and most ecologically complex.<sup>83</sup> Connectivity with other forests was deemed an important factor for urban wildlife corridors. The segment area is straightforward - the size of the forest, while segment ratio of area to perimeter is designed to get at how much interior forest habitat exists versus exposed edge habitat. Edges are more susceptible to many invasive plant and animal species, such as brown-headed cowbirds, notorious nest parasitizers. The maximum height of the stand is also an indicator of canopy volume and a general indicator of age and vertical structural diversity within the forest.

Table 5 outlines the parameters used to score ecological benefits, and Figure 7 identifies the locations of the top 100 forests and ranks them from 1 to 100 (with 1 being most important) in providing those benefits.

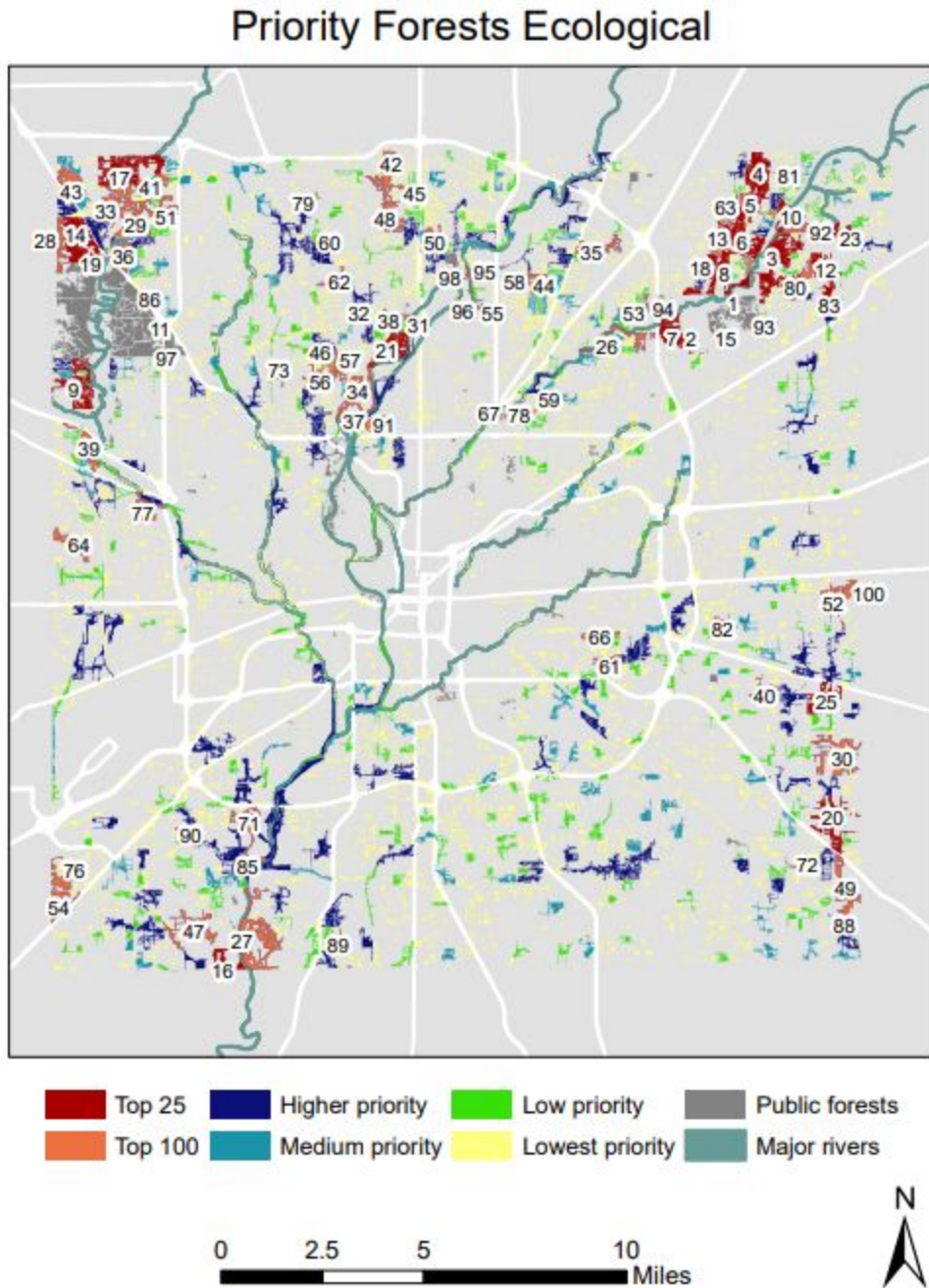
**Table 5: Ecological Benefit Features Used to Rank Forests:**

<b>Ecological Benefits - Priority 39%</b>
Remnant Forests - Historical Aerial photography
Complex Area - Connectivity
Segment Area
Segment Ratio - Area (sq. ft.)/perimeter (ft.)
Segment Height (max)

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<sup>83</sup> Documenting Changes in the Natural Environment of Indianapolis-Marion County from European Settlement to the Present. Robert C. Barr, Bob E. Hall, Jeffrey S. Wilson, Catherine Souch, Greg Lindsey, John A. Bacone, Ronald K. Campbell, Lenore P. Tedesco. Ecological Restoration, Vol. 20, No. 1 (March 2002), pp. 37-46

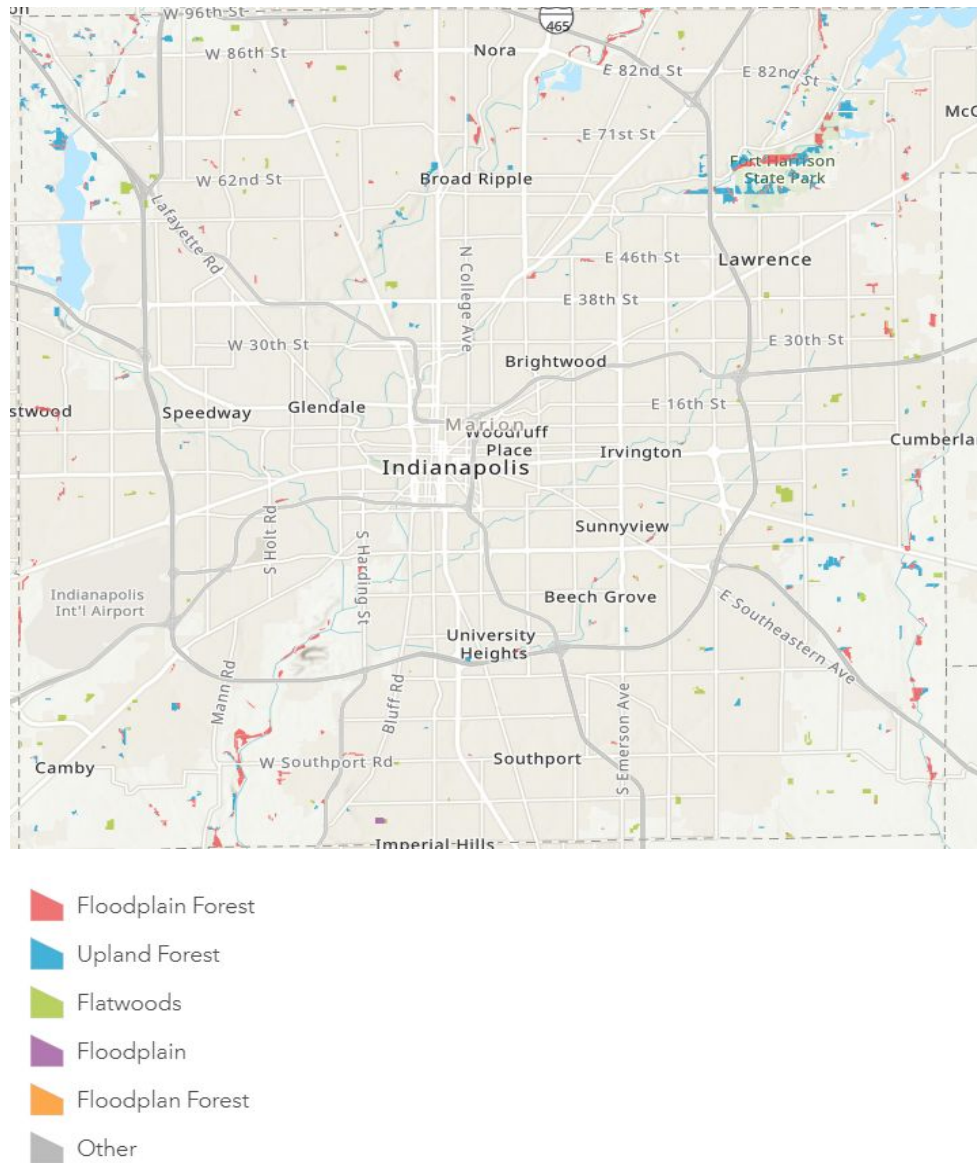
Figure 7: Ecological Benefits



Remnant forests shown in Figure 8 were weighted heavily in the analysis of ecological benefits. Connectivity with other forests was also an important factor. The forests providing the most ecological services are on the north side of Indianapolis, in part because there are more forests of all kinds on the north side. There is a cluster of hard-working forests along Fall Creek and

Mud Creek to the northeast. In the north central part of the county there is another cluster along the White River, Williams Creek and Crooked Creek. And in the northwest, there is a cluster north of the Eagle Creek Reservoir along Eagle Creek and Fishback Creek. Hard-working forest clusters also appear outside the I-465 loop along the lower White River to the southwest and along Grassy Creek and Buck Creek in the southeast part of the county. Similar to forests providing high environmental service benefits, the arrays of these clusters portrays the substantial potential value of a forest preserve network along riparian corridors.

**Figure 8: Remnant Forests of Indianapolis** <sup>84</sup>



<sup>84</sup> Documenting Changes in the Natural Environment of Indianapolis-Marion County from European Settlement to the Present. Robert C. Barr, Bob E. Hall, Jeffrey S. Wilson, Catherine Souch, Greg Lindsey, John A. Bacone, Ronald K. Campbell, Lenore P. Tedesco. *Ecological Restoration*, Vol. 20, No. 1 (March 2002), pp. 37-46

Social Benefits:

Forests provide the most benefit to those that live nearby. The City of Indianapolis - Marion County has a diverse population of 876,384 people with about 28% identifying as African American, 10% Latino, 3.2% Asian, .3 % Native American, and 3% mixed race according to US Census data.<sup>85</sup> About 25% is under the age of 18, with 7.3% under the age of 5, and 12 % over the age of 65. About 9.5% of the population are foreign born persons and 13.7 % of the Indianapolis population speaks a language other than English at home. About 66.9% of the population is employed. About 85.5% of Indianapolis residents have a high school diploma and about 30.4% have a Bachelor's degree or higher. Approximately 19% of Indianapolis residents experienced poverty in 2019 while 10% experienced deep poverty, meaning they earned less than half of the Federal Poverty Level. The median income is \$27,119, about \$1,300 less than the state average. About 53% of residents own their homes. The median mortgage is about \$1,148 per month and the median gross rent is about \$865, slightly higher than the state average of \$807 per month.<sup>86</sup> Many Indianapolis residents cannot afford to travel to national forests or even state parks. The preservation of urban forests will make natural areas much more accessible to the City's working poor.

To evaluate social benefits, we evaluated total population as well as the population under 17. Housing and Transportation variables that are reflective of relative income were incorporated from the national Social Vulnerability Index dataset. This index incorporates factors like crowding and whether or not households have a car. The steering committee indicated that proximity to schools was also a priority to ensure that young people have access to forests and nature.

Table 6 outlines the parameters used to score social benefits and Figure 9 identifies the locations of the top 100 forests and ranking them from 1 to 100 (with 1 being most important) in providing those benefits.

**Table 6: Social Benefit Features Used to Rank Forests**

<b>Social Benefits - Priority 28%</b>
Total Population G1: 2 (biased for population already)
Housing & Transportation Social Vulnerability
Population under 17
School area (within half mile)
ParkNeed (none within half mile)

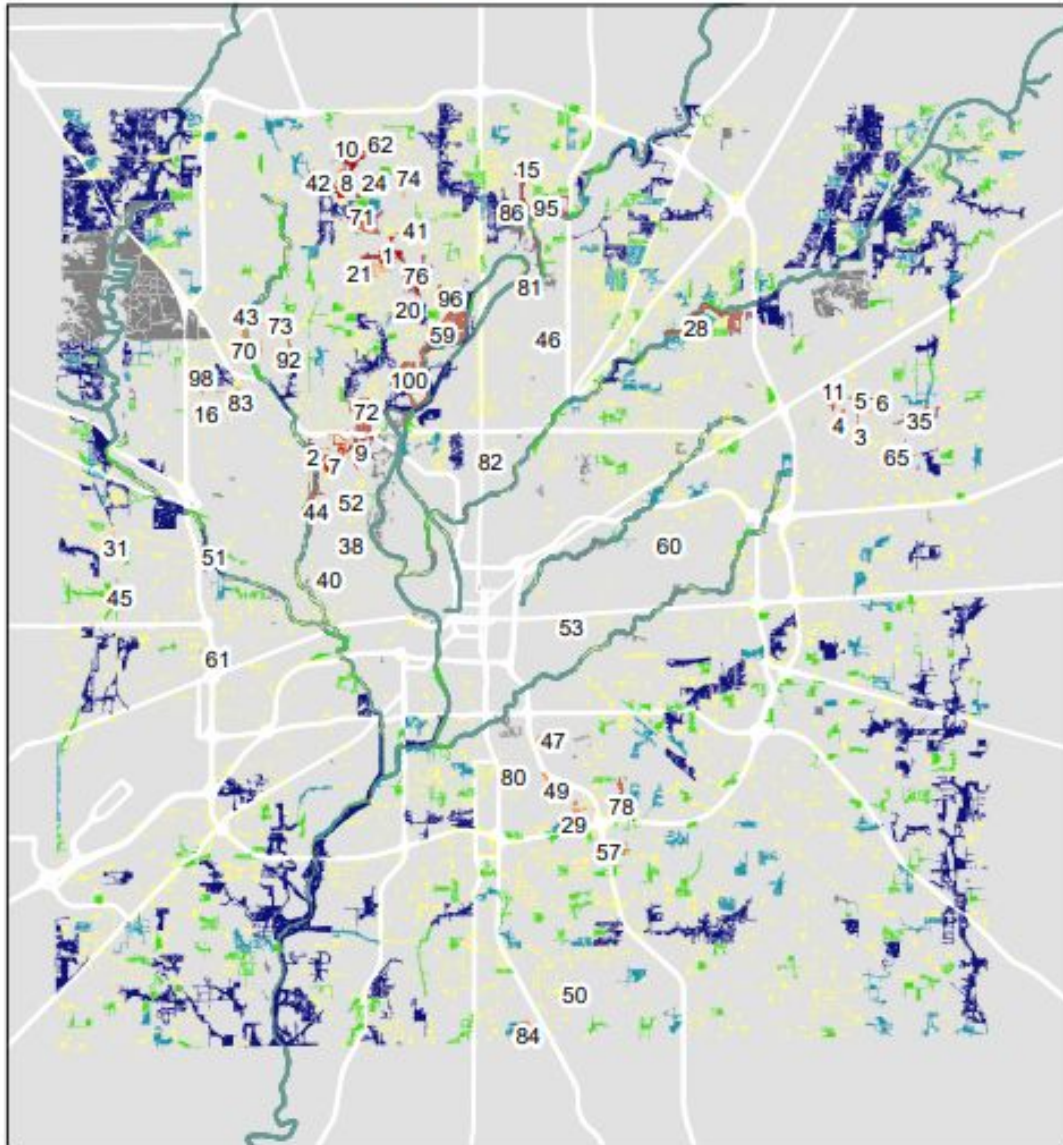
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<sup>85</sup> <https://www.census.gov/quickfacts/fact/table/indianapoliscitybalanceindiana,US/PST045219>

<sup>86</sup> <https://www.census.gov/quickfacts/fact/table/indianapoliscitybalanceindiana,US/PST045219>

Figure 9: Social Benefits

### Priority Forests Social



- Top 25
- Higher priority
- Low priority
- Public forests
- Top 100
- Medium priority
- Lowest priority
- Major rivers

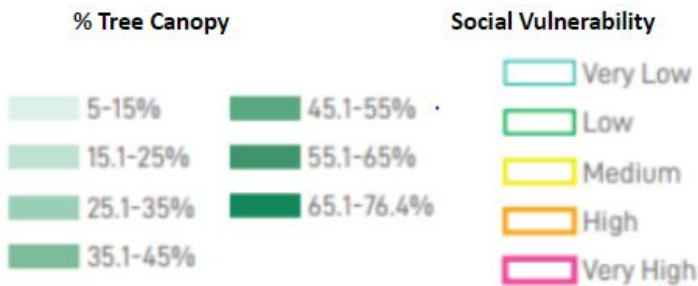
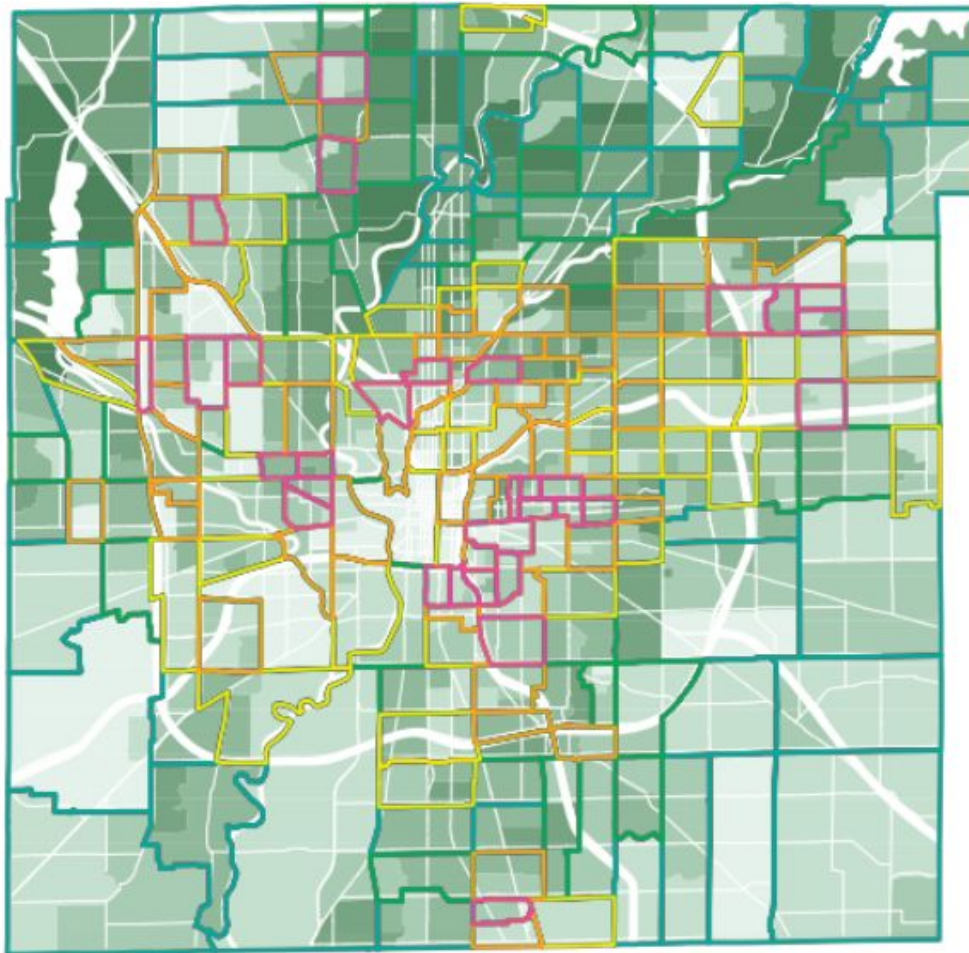
0 2.5 5 10 Miles



Washington Township in north central Indianapolis, near the White River and Crooked Creek, has the most forests providing the greatest social benefits. Clusters also occur on the east side and south central part of Marion County. Other areas may have greater social vulnerability but fewer forests to protect. As noted earlier, the TPL ParkScore found that only 35.4 % of Indianapolis residents have a park within a 10-minute walking distance, including 18% of the white population and 21% of people with other racial/ethnic backgrounds. Accordingly, proximity to existing parks was incorporated into the social benefits score.

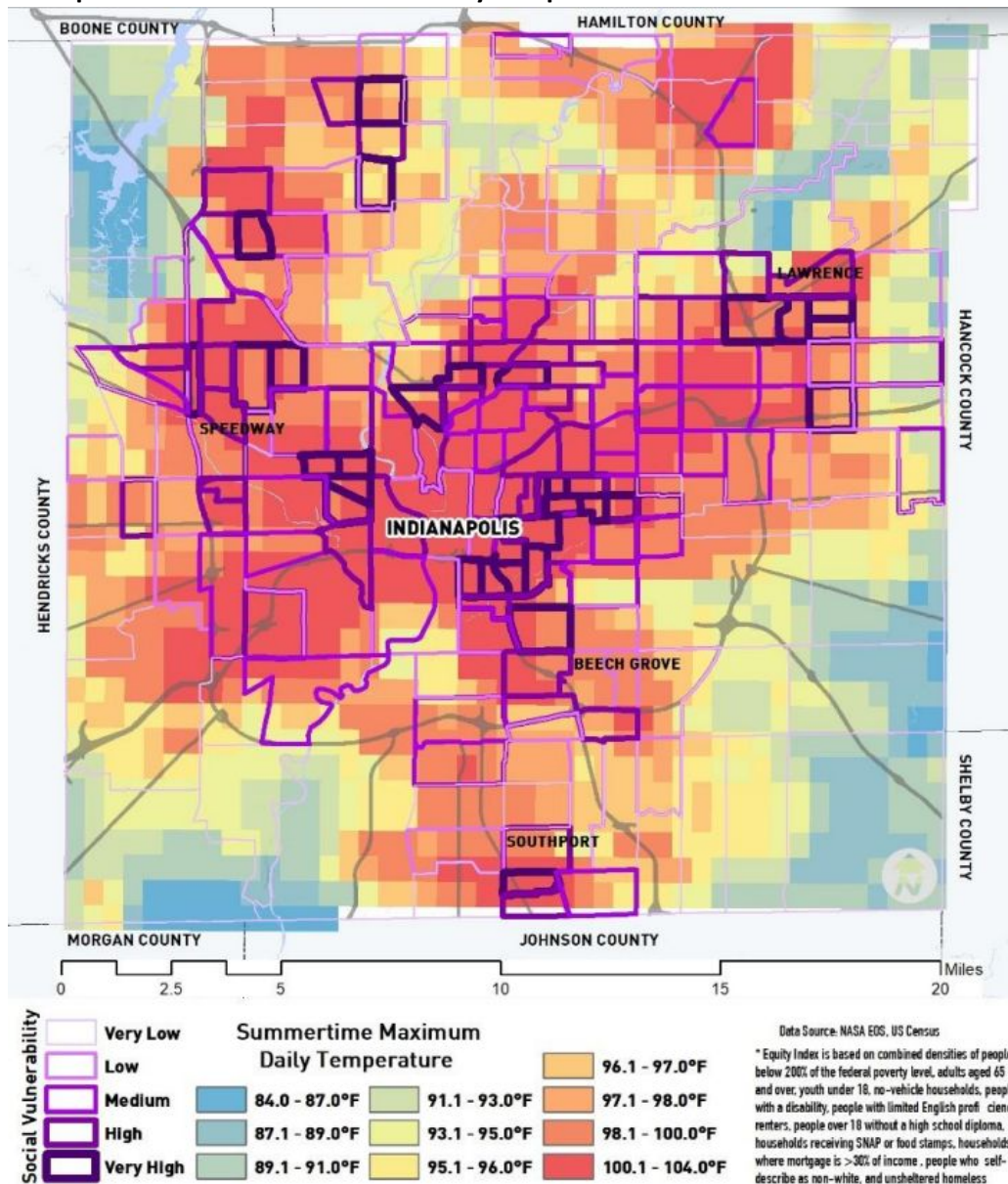
The Thrive Indianapolis Plan documents the average tree canopy in each census tract. This is shown in Figure 10 in shades of green with darker green representing greater tree canopy. Social vulnerability is shown by the color of the outline of the census tracts, with low vulnerability areas shown as a green border and yellow, orange and red borders indicating progressively more social vulnerability. Note that the social vulnerability index used here is slightly different than the index used by the Centers for Disease Control; the main difference being in the definitions of poverty. Nevertheless, Figure 10 demonstrates that areas with greater social vulnerability tend to have less tree canopy on average, but it also shows that most areas with high vulnerability have some forest canopy that could be protected to increase community resilience. There is also some overlap between census tracts with higher social vulnerability in near east and near west neighborhoods, Lawrence and in the northwest and south sides of Indianapolis and areas with greatest needs for parks (see Figure 1, Park Need).

**Figure 10: Percent tree canopy and social vulnerability by census block group.**



The City of Indianapolis has recognized the importance of forests, not just for aesthetics but also for the co-benefits that trees provide. The Climate Hazard and Social Vulnerability Assessment emphasizes the impacts of high temperatures, especially on the City’s most vulnerable residents. While the amelioration of high temperatures was used in the scoring of environmental benefits, we concur that lowering high summer temperatures is also an important social benefit. Figure 11, also taken from the Thrive Indy Plan, shows that summertime maximum daily temperatures usually occur in areas of high to very high social vulnerability.

Figure 11: Indianapolis Summertime Maximum Daily Temperature.



In recognition of the important role that trees play in creating a more tolerable micro-climate, the City and area non-profits like Keep Indianapolis Beautiful have made a commitment to tree planting,<sup>87</sup> but the City has not made the same commitment to protect existing tree canopy in the communities that need it most. Tree planting is expensive, and it is far more cost effective to maintain the trees we already have.

<sup>87</sup> [Tree Canopy Planner – Keep Indianapolis Beautiful - Planting Trees Since 1976](https://pg-cloud.com/KIB/)  
<https://pg-cloud.com/KIB/>

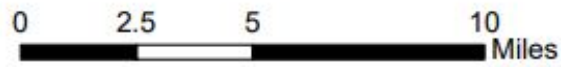
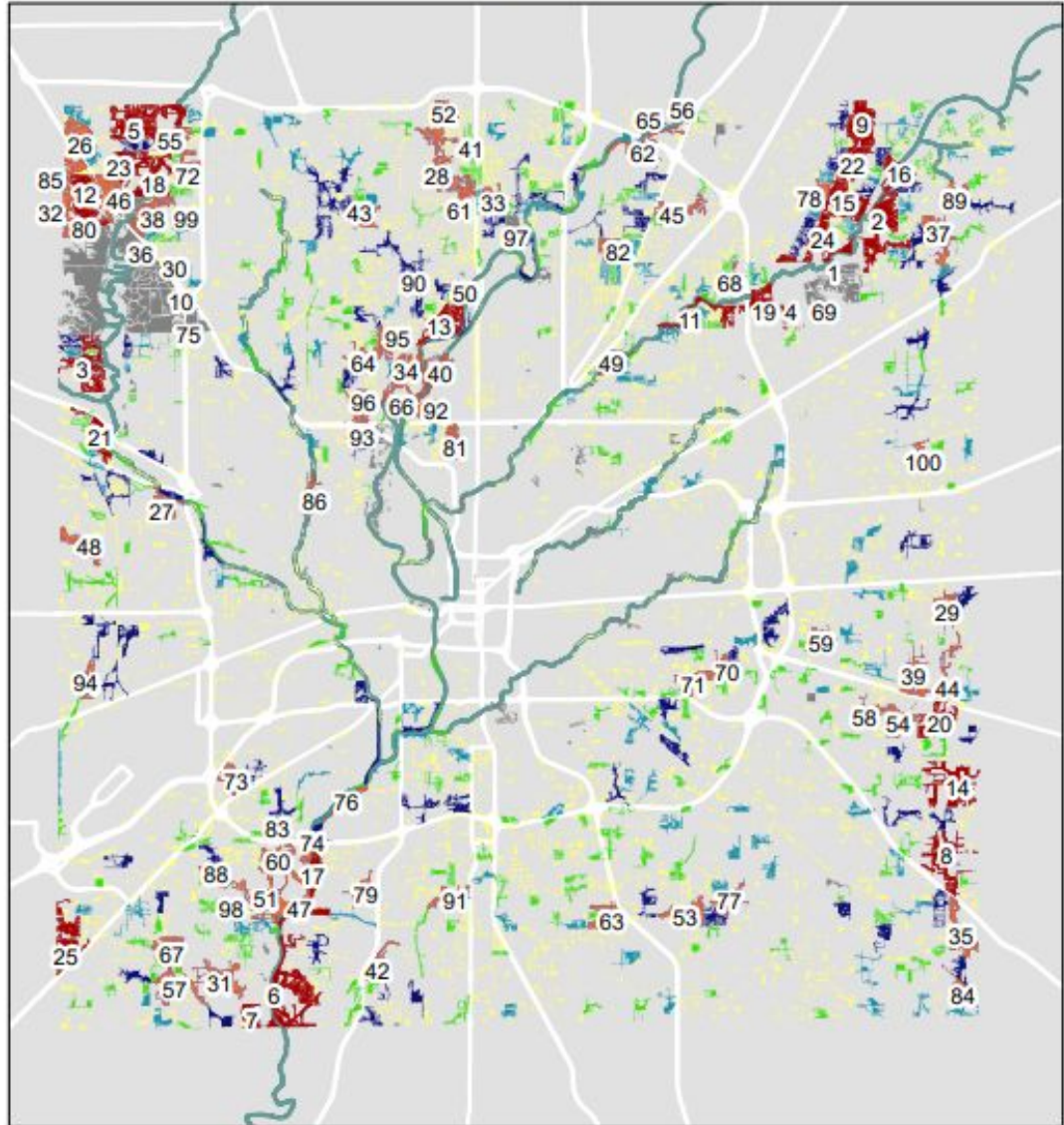


### Total Benefits

The top ranked forests overall indicate those forest segments that are providing the most benefits on average across all three categories: environmental, ecological and social. A list of the top 100 forest segments is included in Appendix C. The map in Figure 12 shows clusters of high priority forests that are interconnected and suggest the high potential value that a network of urban forest preserves could provide including multiple benefits that would improve quality of life and property values. They would also reduce expenses for built infrastructure while making communities more resilient across the City. Forest preserves could be managed and maintained at far less cost than traditional parks.

Figure 12: Total Benefits

### Priority Forests



## Implications of Forest Vulnerability Analysis: Need for Forest Protection Strategies

At present, Indianapolis' tree canopy along its city streets provides at least \$9 million in ecosystem services each year.<sup>88</sup> The value of the 4,237 urban forests we describe here would be much greater. In the prioritization analysis above, some of the hardest working forests are identified. This green infrastructure is already in place and working but is under-appreciated and under pressure from development as the City grows. Indianapolis needs to think very strategically about where development will occur in order to protect these critical forest infrastructure assets by protecting and maintaining existing tree canopy on both public and private lands. Right now, Indianapolis has a window of opportunity to improve resilience and quality of life by finding ways to protect our existing urban forest. In the next section, urban forests are classified according to the protection strategy that seems most promising for funding their conservation.

### III. Classifying Urban Forest by Protection Strategies

In the ensuing discussion, the Conservation Fund (hereafter, "the Fund") has classified county parcels that include portions of the 4,237 unique tree canopy segments in Marion County by protection strategies. Different types of forests will require different conservation strategies to protect. Each of these strategies has different combinations of legal/programmatic requirements, funding needs, and funding sources. Note that the acreage totals described below are the entire parcel's acreage, not the subset of the property that contains the tree canopy, and that the percent of county land area is for the total parcel area relative to all of Marion County. The protection strategies here can be combined with the benefit maps earlier in the report to identify the most important areas for financial investments in forest protection.

The eight strategies for protection are:

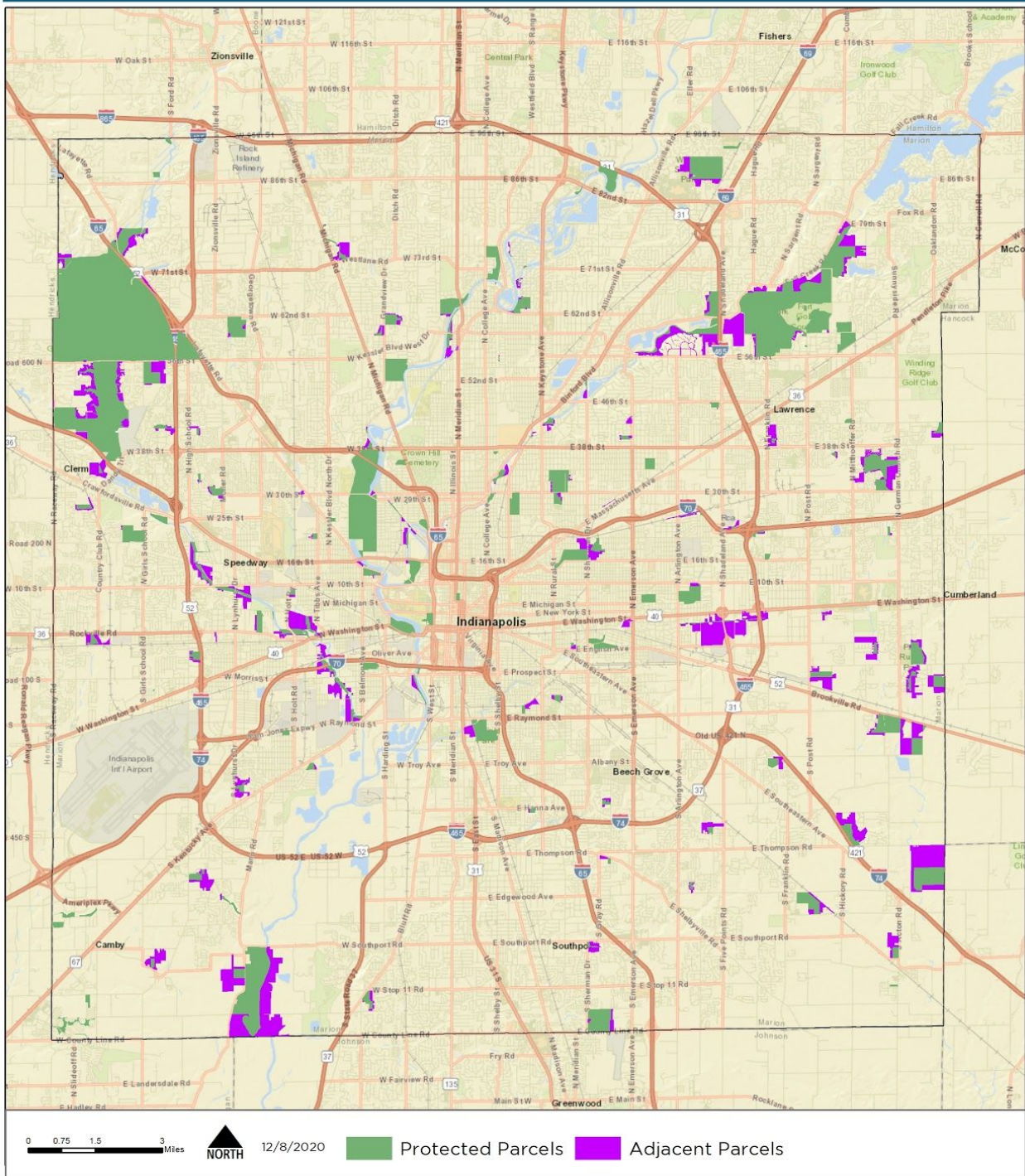
1. Protected Lands: These are parcels identified and protected as a public park or a public or private conservation land. They include City parks and golf courses and Fort Benjamin Harrison State Park. Tree canopy should be preserved on these properties, and there are opportunities to expand tree canopy on portions of some of these properties. 424 parcels | 11,983 acres | 5.1% of county land area
2. Open Space Network Expansion: Tree canopy adjacent to existing parks and open space could be most suitable as expansions to the county's protected open space. There may be some leverage opportunities with the riparian corridor opportunities. Funding for these expansions could be generated using some combination of strategies described in the Financing Strategies section of this report. Indiana is one of only two states that has no records of conservation financing initiatives in the Trust for Public Land's landvote.org database. Nevertheless, except where Indiana's State Constitution or State enabling legislation prohibits Marion County from exploring financing options, there may be opportunities to fund tree canopy preservation projects using bonding or other resources beyond State appropriations, city and county budgets, and the Indianapolis

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<sup>88</sup> Davey Resource Group. 2016. Tree Management Plan: City of Indianapolis, prepared for the Department of Public Works. Copy available upon request from IFA.

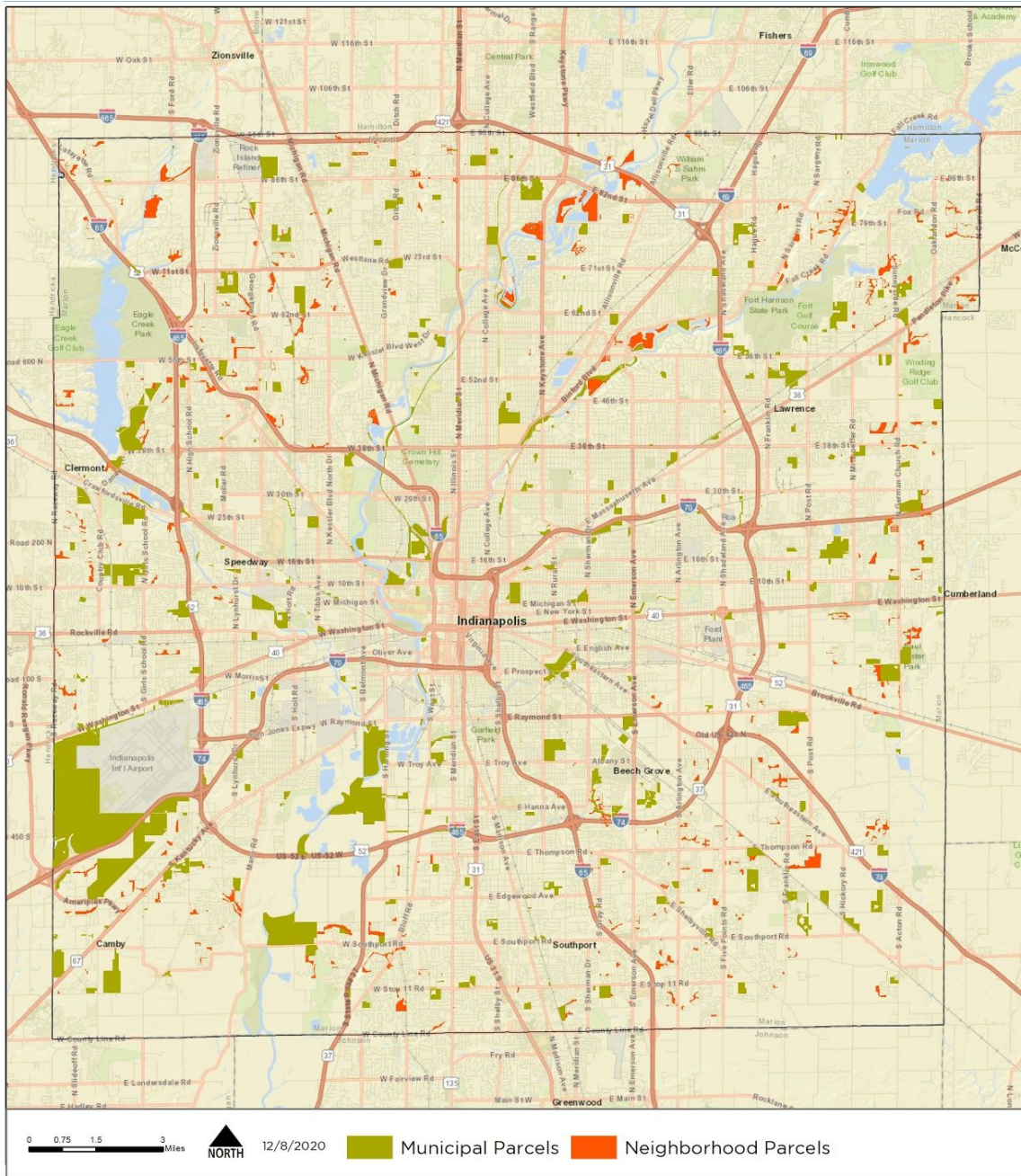
Long Term Control Plan to minimize combined sewer overflows. 1,153 parcels | 4,582 acres | 1.9% of county land area.

Figure 13: Protected lands and adjacent parcels with tree canopy



3. Neighborhood Stewardship: These are parcels owned primarily by homeowner associations and are most suitable for protection programs of homeowner associations or voluntary municipal programs focused on backyard forests. 899 parcels | 2,988 acres | 1.3% of county land area
4. Municipal Opportunities: These are parcels owned by public agencies and utilities that are not designated as protected but include existing tree canopy. Some may contain opportunities for tree canopy protection and enhancement. 951 parcels | 10,937 acres | 4.6% of county land area

Figure 14: Municipal and neighborhood stewardship parcels with tree canopy

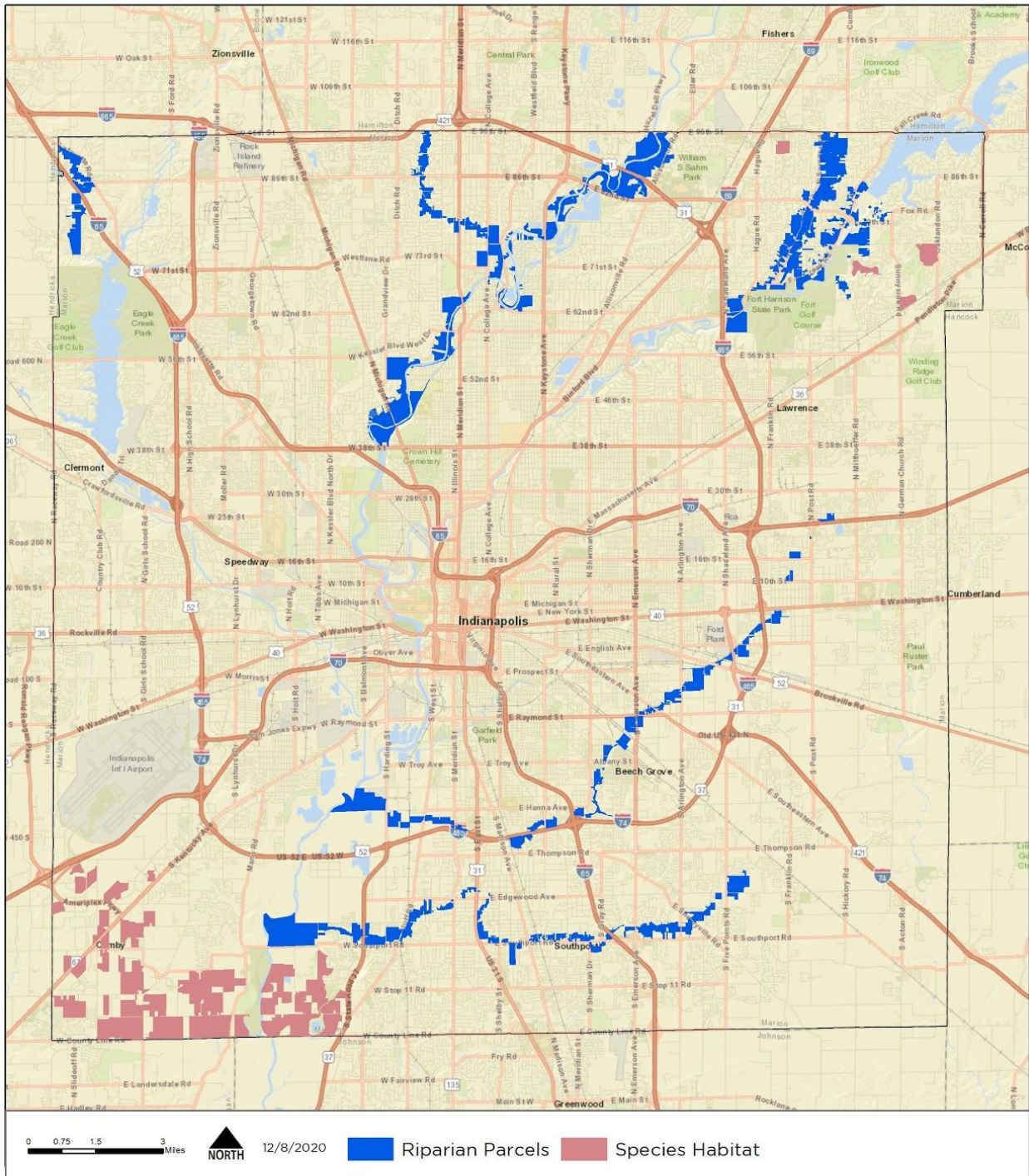


5. Riparian Waterway Buffers: Tree canopy adjacent to the White River north of the Broad Ripple Dam and Fall Creek north of the Keystone Dam are suitable for a riparian forest buffer protection program that could be supported by Citizen Energy Group’s Long Term Control Plan. While the current Long Term Control Plan that attempts to curb the overflow of raw sewage from combined sewers into waterways exclusively suggests engineered solutions, future work with Citizens Energy Group could support green solutions where the marginal cost to implement them is lower than engineered solutions. The White River Vision Plan, which include the principles “Restore and Adapt” and “Preserve Places for Everyone”, recognizes the importance of forests and their

connection to stream health when it proposes the “Action: Promote healthy streamside forests/ riparian corridors to mitigate impacts of floodplain development on stream health.” This map also identifies other strategic riparian corridors that still include high priority forested areas, including the White River south of the Broad Ripple Dam to the “Crow’s Nest”, Upper Fishback Creek, Lick Creek, and Little Buck Creek. 1,060 parcels | 7,292 acres | 3.1% of county land area

6. Wildlife Habitat Protection: Some tree canopy is home to important wildlife habitat +protection opportunities where Federal funding is earmarked for these purposes. These parcels 20 acres and greater are highlighted since these properties provide multiple ecosystem service benefits and since these Federal funding sources can only be used in these locations and can leverage other local and state funding sources. 80 parcels | 4,502 acres | 1.9% of county land area.

Figure 15: Riparian buffer and species habitat parcels with tree canopy





7. Carbon Offset Revenue Potential: The City and Mayor Joe Hogsett pledge to achieve carbon neutrality by the year 2050 and launch “It’s My City,” a three-year campaign dedicated to creating an Indianapolis that is cleaner, greener and more beautiful. For forested parcels as small as 30 acres, there are emerging markets and opportunities to receive revenues from selling carbon offset credits for sustainable forest management that sequesters carbon. Landowners could be contacted to ensure that they are aware of these programs, once it becomes clearer whether these programs are feasible in Marion County. Programs worthy of further evaluation include Core Carbon<sup>89</sup>, City Forest Credits,<sup>90</sup> and the Natural Capital Exchange.<sup>91</sup> Indiana also could model a program similar to the Pennsylvania Family Forest Carbon Initiative,<sup>92</sup> which is developing a protocol for aggregating forest ownerships as small as 30 acres to provide access to carbon markets for small woodland owners. The costs for City acquisition of forest, perhaps similar to programs in Austin, Pittsburgh, Richmond VA, and Seattle/King County, could also be partially offset by selling carbon offset credits to manage these lands similarly to sequester carbon. 310 parcels | 23,074 acres | 9.8% of county land area
  
8. Vacant and Underutilized Land: These are privately owned parcels greater than one acre with identified tree canopy that are currently undeveloped. Depending on the size, location, and surrounding land uses, these could be new forested parkland, neighborhood pocket parks, or other open spaces that preserve existing forest. These may be particularly suitable as Forest Preserves. . These are distinct from city/county parks in that their management focus is on passive recreation and resource protection, so the cost per acre to maintain them is lower than traditional city/county parks that require more investments for active recreation, paved trails, and other infrastructure. An excellent example of a Forest Preserve District is in Lake County, Illinois where they have laid out a 100-year plan for investing in land managed for passive recreation, ecological restoration, and forest protection.<sup>93</sup> 2,261 parcels | 17,916 acres | 8.2% of county land area.

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<sup>89</sup> <https://www.corecarbon.com/>

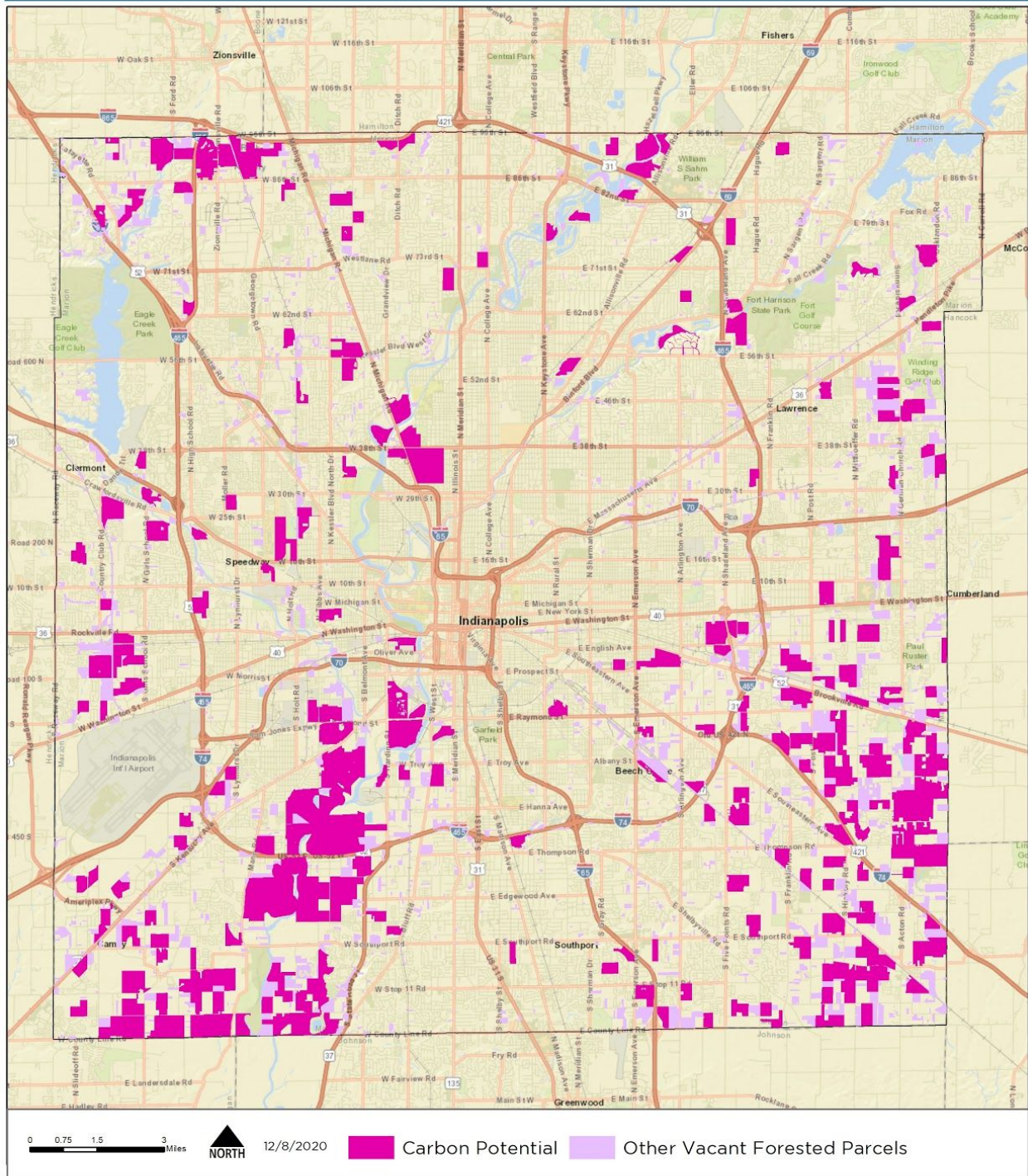
<sup>90</sup> <https://www.cityforestcredits.org/>

<sup>91</sup> <https://www.silviaterra.com/ncapx/landowners>

<sup>92</sup> <https://www.familyforestcarbon.org/>

<sup>93</sup> <https://www.lcfpd.org/vision/>

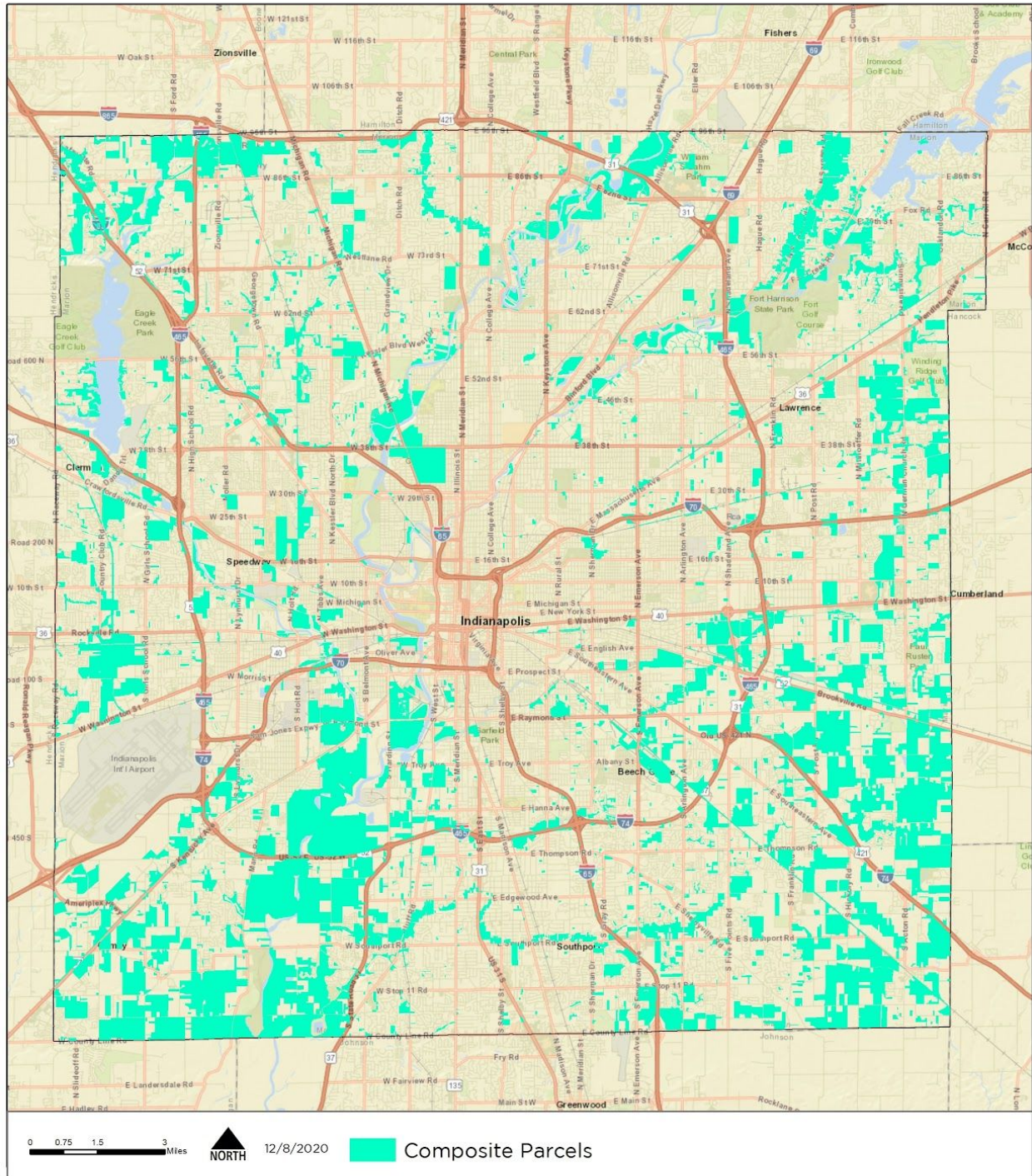
Figure 16: Potential carbon parcels and other vacant lands with tree canopy



### Composite Summary Map:

This map, which includes riparian buffers, wildlife species habitat, carbon program lands, vacant and underutilized lands, and lands adjacent to protected lands, includes a total of 5,247 parcels encompassing 45,045 acres (19.1% of total county land area).

Figure 17: Composite map of potential forest protection opportunities



## IV. Forest Protection Financing Mechanisms

### *Land and Water Conservation Fund (LWCF):*

The Greater American Outdoors Act<sup>94</sup> has increased LWCF to the maximum allowed by law, \$900 million annually. This means that Indiana's share of statewide LWCF allocations will roughly double. Traditionally, statewide LWCF funding has gone to priorities identified in the Statewide Comprehensive Outdoor Recreation Plan (SCORP) plan. The City could capitalize on this plan's emphasis on trails, as discussed below.

### *Marion County Budget Book Capital Expenditures:*

In the City's most recent budget, a \$1 million one-time allocation was made for parks capital needs.<sup>95</sup> A similar allocation could be made on an annual basis for land acquisition for forests and parks as a capital expenditure. This funding could be used for matching funds for LWCF programs and other sources to protect land in Indianapolis.

### *One-Percent for Open Space Initiative:*

A private/corporate funding initiative could be developed, modeled after Crested Butte, CO<sup>96</sup> where local companies would donate 1% of gross revenue for forest/open space protection. This also could be tied in with the forest carbon programs described earlier.

### Bonds, Taxes, and Fees:

The Fund undertook funding mechanism research, primarily using The Trust for Public Land's LandVote database<sup>97</sup> and found that Indiana was one of only two states in the country that had zero instances of funding initiatives allocated for parks, open space, and forest protection. This is primarily because this database mostly tracks ballot initiatives unused in Indiana that lead to new bonds, taxes, and fees. Outside of a ballot initiative, Indianapolis issued a General Obligation Bond of about \$5 million for parks in 2017. In addition, the bonding done by water utilities for stormwater projects may be sources for future forest protection with the establishment of programs similar to the Milwaukee Greenseams Program<sup>98</sup> or the Upper Neuse Clean Water Initiative<sup>99</sup> for the upper White River or upper Fall Creek.

The Fund has listed examples of places below where these mechanisms have been successful in other states as well as, where available, the percentage of voters that approved their enactment. Note that while these may have been ballot initiatives in other states, implementation of these in Indiana without a ballot initiative may be feasible. Where examples from the Midwestern United States were available, those have been listed. For other examples

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<sup>94</sup> <https://www.nps.gov/subjects/legal/great-american-outdoors-act.htm>

<sup>95</sup> <https://www.indy.gov/activity/city-and-county-budget>

<sup>96</sup> <https://1percentforopenspace.org/>

<sup>97</sup> <http://LandVote.org>

<sup>98</sup> <https://www.conservationfund.org/projects/greenseams-program>

<sup>99</sup> <https://www.conservationfund.org/projects/upper-neuse-clean-water-initiative>

where the approach was novel, a representative example (or the only example in the Trust's database) from the country is provided.

#### *Open Space Bonds:*

This is the most common approach to parks and open land acquisitions that protect forests, with most of the funding generated through ballot initiatives. Indiana has limited bonding capacity; school construction bonds, water utility revenue bonds, and some form of bonding for meeting pension obligations are the only bonding we could uncover. IFA is currently looking into municipal bonding options that could pass muster with the state.

##### Open Space Bond Examples from the Midwest

Linn County IA, \$22 million, 2016, 74% Pass  
Lake County IL, \$185 million, 2008, 66% Pass  
Johnson Co KS, \$5.7 million, 1998, 69% Pass  
Washington Co MN, \$20 million, 2006, 61% Pass  
Adams Co PA, \$10 million, 2008, 75% Pass

#### *Property Tax:*

These take the form of millages and dollar per parcel assessments, usually time limited. The State of Indiana appears to have no mechanism for voters to consider property tax increases earmarked for open space acquisition and has very specific guidelines for how tax dollars are allocated within state and local budgets. There are no examples from Indiana of specific funds being allocated to land acquisitions within the Landvote.org database. Any tree canopy acquisition funding would have to come from Marion County general funds or a line item in the parks budget.

##### Property Tax Examples to Acquire Parks and Greenspace in the Midwest

DeKalb County IL, \$5 million, 2006, 52% Pass  
Washtenaw County MI, \$25 million, 2000, 64% Pass  
Ottawa County MI, \$32 million, 2006, 67% Pass  
Summit Metro Parks OH, \$204 million, 2020, 73% Pass  
Columbus & Franklin Co OH, \$30 million, 2018, 67% Pass

#### *Real Estate Transfer Tax:*

This is where a small fee is included on every residential and commercial real estate closing and is put into an open space fund. Real estate transfer taxes have specifically been forbidden in Indiana by recent State legislation.<sup>100</sup>

##### Examples from around the country

Harford County MD, \$70 million, 1992, 70% Pass (farmland)  
San Juan County WA, \$16 million, 2011, 53% Pass (extension of 1% tax)

Maryland Program Open Space: In 1969, the Maryland General Assembly created Program Open Space, a dedicated funding program that institutes a transfer tax of 0.5 percent on every real estate transaction in the state. This simple program is intended to keep pace with development, making sure that as land is developed, there is enough

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<sup>100</sup> <https://johnbtittle.com/new-indiana-law-eliminates-hidden-real-estate-transfer-fees-2/>

open space reserved for residents to enjoy parks, ball fields, playgrounds, historic properties, scenic lands, and agricultural production.

*State Lottery:*

The current Indiana lottery has a very specific allocation to programs that do not include the preservation of nature, so there would need to be state legislation to change the formula. There is no mechanism for a ballot initiative to adjust the formula.

Examples of open space acquisition funds from lotteries around the country  
Arizona \$400 million, 1990, 62% pass  
Colorado, \$600 million, 1992, 58% pass  
Minnesota (Constitutional amendment), \$223 million, 1998, 77% Pass  
Nebraska, \$297 million, 1992, 62% Pass  
Oregon, \$700 million, 1998, 67% Pass; \$1.74 billion 2010 , 69% Pass

*Utility Tax:*

Some utilities include a rate-payer charge on water bills for open space and forest protection to help with stormwater compliance. Some of these have been added by ballot initiative, but others have been approved administratively by the utilities themselves.

Examples around the country  
Overland MO, \$1,150,000, 1995, 78% Pass  
Portola Valley CA, \$608,539, 2005, 58% Pass  
Cupertino CA, \$62.5 million, 1990, 77% Pass  
Olympia WA, \$30 million, 2004, 57% Pass

Stormwater utility fees also have been established administratively by the City of Raleigh, NC and Philadelphia, PA. The monthly fees to each customer have varied over time, as has the allocation for land protection projects.

*Sales Tax:*

These are very small fractions of a percent on retail sales in a county. Indiana has very strict allocations on where sales tax dollars are allocated, so these may not yet be feasible in Indianapolis.

Examples from the Midwest of sales tax revenues for Open Space  
St. Clair County IL, \$16 million, 2000, 62% Pass  
St. Louis County MO, \$280 million, 2000, 70% Pass

*Hotel Occupancy Tax:*

These are small fractions of a percent on hotel stays. Although Indianapolis has an existing convention and hotel tax used to boost tourism efforts, Indiana imposes strict allocations on where these funds go, so this approach might require a state statutory change to be feasible. Two ballot initiatives in California have failed, although those both needed two-thirds approval.

### Examples Around the Country

Napa County CA, \$640,700, 2000, 64% Support (Failed)

Carmel-by-the-Sea CA, \$4 million, 2005, 54% Support (Failed)

Frisco CO, \$2.5 million, 2003, 64% Pass

#### *Meals Tax:*

These are very small fractions of a percent on prepared meals. Indiana has very strict allocations on where sales tax dollars are allocated, so again, this approach might require state statutory change. The one successful example found in the Landvote.org database was from Ashland, OR in 2009, an economy built on event tourism. It was a 20-year, 5 percent meals tax with 20 percent allocated for open space purchases (estimated proceeds \$6 million).

#### *Highway Fund Assessment:*

Other than for mitigation of impacts from specific highway projects, the State of Indiana does not have a mechanism for allocation of highway funds to forest or open space acquisition, and the only example we found at a local level for this type of funding is from Bedford, NY. It was a special tax levy of 1% to 2% of the Highway Fund over five years, estimated to raise about \$6.6 million.

#### *Motor Vehicle Tax:*

This option, called Proposition 51, failed in California in 2002 with only 41% voting to approve \$2 billion in open space funding as part of a larger \$20 billion package that included transportation programs. However, that state has been successful with open space funding through its Proposition system, which is not available in Indiana.

#### *Corporate Business Tax:*

New Jersey in 2014 was able to use this method to fund its statewide Green Acres program. 65% approved \$2.15 billion of a dedicated tax for protecting open space, farmland, historic sites, and flood prone areas,

#### *Income Tax:*

Two municipalities in Ohio (Westerville, Canal Westchester) and numerous Pennsylvania townships (66 approved ballot initiatives) have used this method to save parks, forests, and greenspace, raising between \$2.5 million and \$22 million.

## V. Forest Protection Opportunities in Existing Plans

Although the preservation of forests may not be the intended purpose or the primary outcome of a plan, its implementation may ultimately protect them. Ongoing natural resource planning initiatives also may only have tree canopy protection as a secondary goal but often taking advantage of collaborative opportunities that may not have been readily apparent can result in achieving multiple benefits.

The Fund reviewed the following plans and initiatives to look for opportunities to protect forests in Indianapolis:

- ☐ Indy Greenways Full Circle Master Plan<sup>101</sup>
- ☐ Indiana Statewide Comprehensive Outdoor Recreation Plan (SCORP)<sup>102</sup>
- ☐ Indianapolis Mid-North Quality of Life Plan<sup>103</sup>
- ☐ Indy Parks Comprehensive Master Plan<sup>104</sup>
- ☐ Lower Fall Creek Watershed Management Plan<sup>105</sup>
- ☐ Reconnecting Our Waterways – Fall Creek<sup>106</sup>
- ☐ Citizen Energy Group’s Long Term Control Plan<sup>107</sup>
- ☐ White River Vision Plan<sup>108</sup>
- ☐ Thrive Indianapolis Plan<sup>109</sup>

IFA’s Forests For Indy has found great synergy with the visions articulated in larger plans for the future of the City of Indianapolis. These include most recently the Thrive Indy Plan, which is a partnership led by the Greater Indianapolis Progress Committee and the City that has laid out a Bicentennial Agenda for Marion County with these four core values: A More Resilient, Healthier, Inclusive and Competitive City. Forests for Indy fits well within these goals by taking steps to preserve significant portions of Indianapolis’s remaining forests, which will improve the health, happiness, and wealth of residents, and make Indianapolis more attractive to potential residents and businesses.

Trails are mentioned as a priority in many plans and as a priority for funding. According to the Indy Greenways Full Circle Master Plan, there are 60 miles of greenways completed within Marion County, and the plan proposes completing an additional 260 miles. At the state level, the Great American Outdoors Act law doubles the amount of funding available to implement

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<sup>101</sup> <https://indygreenwaysmasterplan.wordpress.com/full-circle-master-plan-2/>

<sup>102</sup> <https://www.in.gov/dnr/outdoor/4201.htm>

<sup>103</sup> [https://www.midnorthplan.org/wp-content/uploads/2016/10/mid-north\\_qolplan\\_2012.pdf](https://www.midnorthplan.org/wp-content/uploads/2016/10/mid-north_qolplan_2012.pdf)

<sup>104</sup> <http://www.planindyparks.com/pdf/indy-parks-final-report-2017.pdf>

<sup>105</sup> <https://thewhiteriveralliance.org/wp-content/uploads/2018/08/Lower-Fall-Creek-Watershed-Management-Plan.pdf>

<sup>106</sup> <https://ourwaterways.org/waterways/fall-creek/>

<sup>107</sup> <https://www.citizenenergygroup.com/Our-Company/Our-Projects/Dig-Indy/Regulation/Long-Term-Control-Plan>

<sup>108</sup> [https://mywhiteriver.com/wp-content/uploads/2020/03/WRVP-Report\\_Final\\_Web.pdf](https://mywhiteriver.com/wp-content/uploads/2020/03/WRVP-Report_Final_Web.pdf)

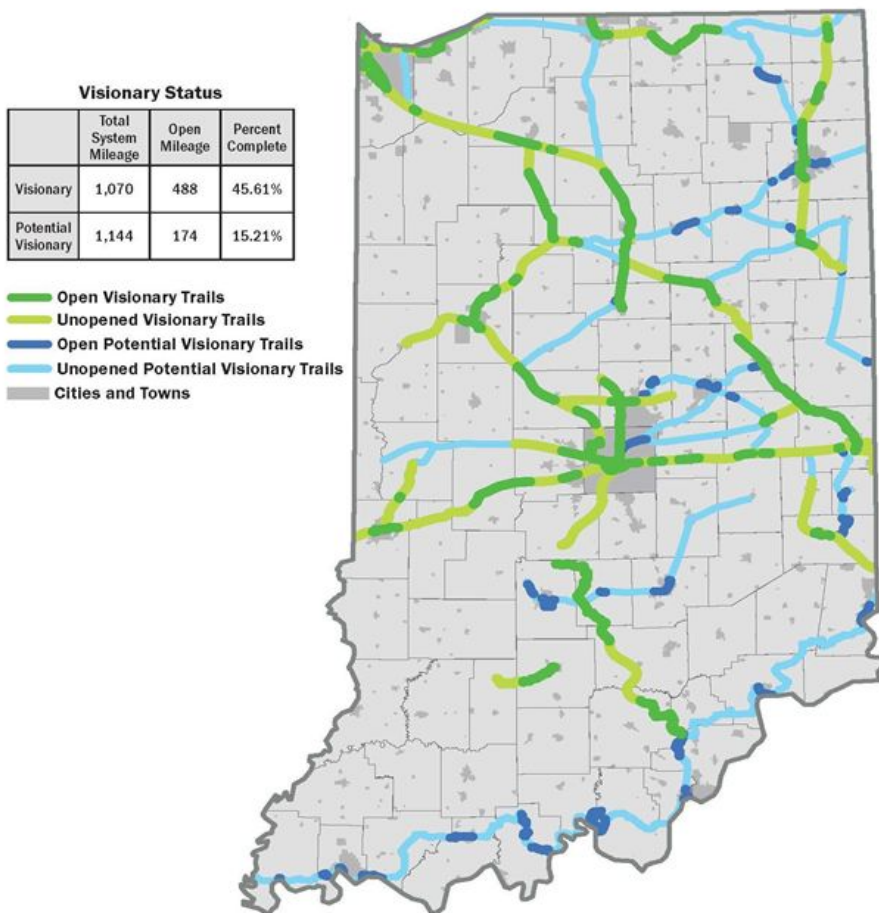
<sup>109</sup> <https://www.thriveindianapolis.com>



State Comprehensive Outdoor Recreation Plans (SCORPs) nationwide for acquisition and development of parks and trails. While the SCORP Plan for Indianapolis is heavily focused on playgrounds, it does include a visionary trail system (see Figure 18). The trails follow the White River System, providing an opportunity to collaborate with wellfield protection, flood reduction, forest preservation and tree planting. SCORP funding can be used for park acquisition and development, including planting trees.<sup>110</sup> At the county level, in the *Mid North Quality of Life Plan*, expanding the Fall-Creek Trail through the Mid North Neighborhood is a priority action. In the Indy Parks Comprehensive Master Plan, expanding the City’s trail system is the highest acquisition priority. In Indiana’s SCORP Plan, trails rank highly as a proposed use of LWCF funding. Forested areas along proposed trail routes can be identified for protection and plans for tree planting along trail routes included.

Figure 18: SCORP visionary trails system

Figure 6.6  
2019 VISIONARY TRAILS SYSTEM PROGRESS



<sup>110</sup> <https://www.in.gov/dnr/outdoor/4201.htm>

The Indy Parks and Recreation Comprehensive Master Plan's user study echoes the SCORP plan's concern about the lack of parkland and the priority for trail development. Thirty percent of the people think that Indy Parks are too far from their home, meaning that some neighborhoods apparently do not have parks nearby. Over fifty-three percent of the people surveyed are in favor of developing new trails that connect parks and existing trail systems and forty percent are in favor of acquiring new parks. The user survey data showed that the public thinks \$25 out of every \$100 for parks should be spent on new walking and nature trails.

Lower Fall Creek Watershed Management Plan/Reconnecting Our Waterways: Marion County Soil and Water Conservation District's *Lower Fall Creek Watershed Management Plan* (LFCWMP) completed in 2009, is being updated. This is the perfect opportunity to meet with the Citizens Energy Group, community groups, and soil and water groups to look for ways to provide amenities for the public as well as flood reduction. Reconnecting Our Waterways can provide the forum for brainstorming these steps. The updated Plan will then be eligible for implementation funding from the Indiana Department of Environmental Management through the federal Clean Water Act. The Plan needs to include tree planting, preservation of forested areas and nonstructural flood reduction, so those needs can be funded with implementation grants.

Proposed Airports, Corporate Campus, and Mixed-Use Development Plan: In the LFCWMP *Lower Fall Creek Watershed Management Plan*, there are general site locations for a Mixed-Use Development, two proposed airports and corporate campus developments. This is a great opportunity to work with the local communities on the zoning regulations of large-scale developments to encourage tree planting, preserve existing trees and set land aside for non-structural flood reduction, conservation and recreation such as the regional park mentioned below that could be a reserve wellhead protection area ensuring adequate water supplies for future growth in Madison, Hamilton and Marion Counties. Midwestern utilities such as the Milwaukee Metropolitan Sewerage District have implemented Chapter 13 of their code, which regulates new development and is a good example of what could be considered by a regional collaboration-based watershed approach.<sup>111</sup>

LFCWMP Wellfield Protection Areas in Marion County: Citizens Energy Group currently draws drinking water in two places in the White River Watershed: at the Broad Ripple Dam and at the Keystone Dam on Fall Creek. Both wellhead protection sites are within heavily developed portions of Indianapolis.<sup>112</sup> Acquisition of considerable forest in the Geist Wellfield Protection Area (see Figure 19) and/or conservation management of this area by Citizens Energy Group could allow this wellhead protection site to provide a dual purpose of recreation as well as water supply to the City.

Water Withdrawals/Addressing Surface Water Quality Problems with More Wellhead Protection : Normally, in late summer, the diversion of large volumes of water from the White River and Fall Creek by Citizens Energy Group into its water plants reduces the volume of water that flows downstream into lower Fall Creek and White River. This water withdrawal reduces the ability of both Fall Creek and the White River to absorb pollutant loads during wet weather. Development of the Wellfield Protection Area identified in the LFCWMP in Madison County or

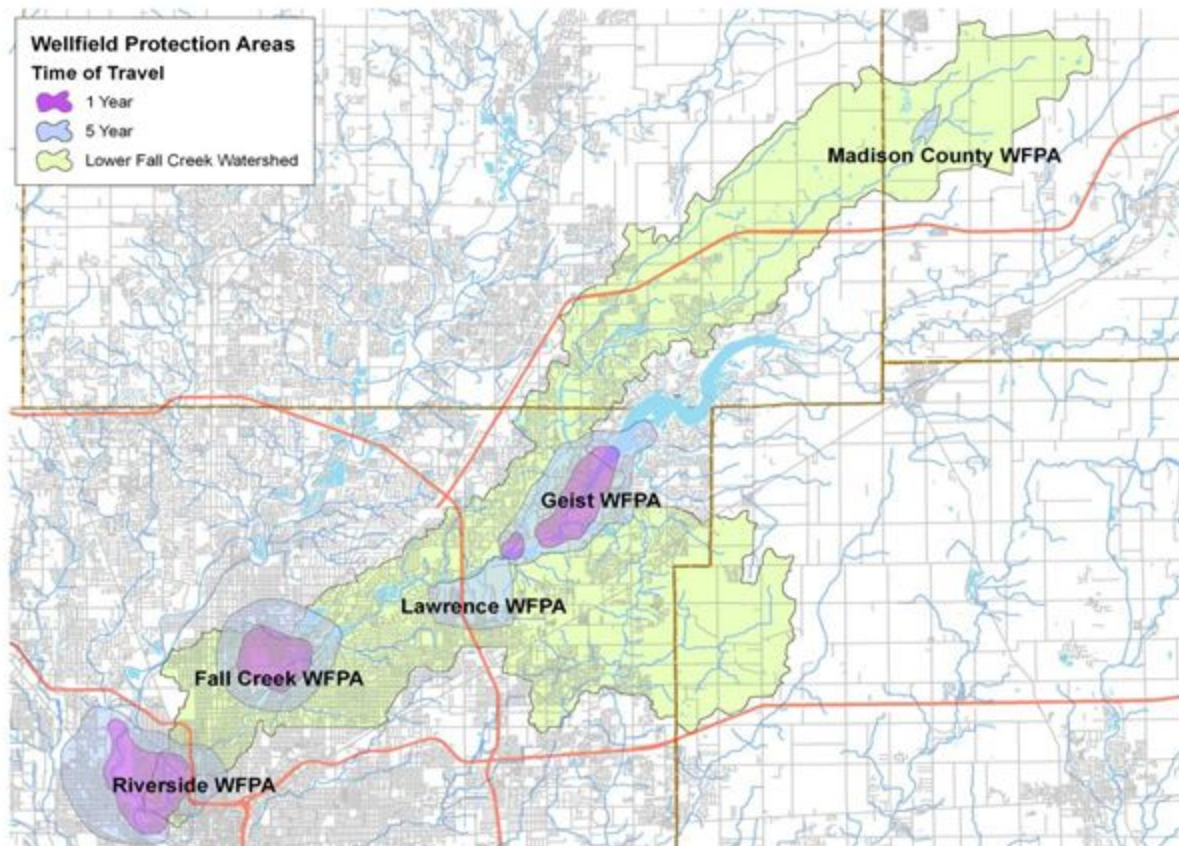
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<sup>111</sup> [https://www.mmsd.com/application/files/9515/9621/1174/Chapter\\_13\\_July\\_2020.pdf](https://www.mmsd.com/application/files/9515/9621/1174/Chapter_13_July_2020.pdf)

<sup>112</sup> See Figure 2-10 Wellfield Protection Areas from Lower Fall Creek Watershed Management Plan, 21.

other likely reserve wellfield sites could help alleviate this problem. There may be an opportunity to develop a regional park that is also a wellfield protection area. The northeastern part of the Lower Fall Creek watershed is heavily agricultural, providing the perfect opportunity for a regional park that includes forest restoration, public recreation and wellhead protection. In addition to assuring adequate future supplies of water, creation of a park would reduce flooding and sediment flowing into the lower Fall Creek watershed neighborhoods.

Figure 19: Wellfield Protection Areas<sup>113</sup>



**Long-Term Control Plan Compliance:** The Citizens Energy Group’s Raw Sewage Overflow Control Program Long Term Control Plan Report (Long Term Control Plan) will be updated in November 2022 and presents an opportunity to consider funding nonstructural flood reduction projects. The current plan mentions forest preservation, wetland restoration, and habitat restoration as options. However, only engineered structural solutions are budgeted and being implemented to reduce flooding. The current plan does not provide the dual benefit of sewage overflow reduction and acquiring and restoring improvements the public can enjoy such as parks, forests and trails.<sup>114</sup> However, it does state the following:

<sup>113</sup> <http://marionhealth.org/water-quality-and-hazardous-materials-management/wellfield-protection-program/>

<sup>114</sup> <https://www.citizensenergygroup.com/My-Home/Utility-Services/Wastewater/Long-Term-Control-Plan>

### *“3.10.2.1 Green Infrastructure*

*Green infrastructure utilizes processes such as infiltration, evapotranspiration and capture and use in order to reduce the amount of stormwater flow being sent to the combined sewer system, particularly in urban areas. This infrastructure can be in the form of small-scale controls, like rain gardens, bioswales and porous pavements, or large-scale controls like riparian buffers, flood plain restoration and wetlands. These controls are designed to collect, store and filter runoff by implementing engineered soil mixes and in some cases, paver systems with gravel. Planning of green infrastructure must take into account important watershed characteristics such as land use, soil types and topography.*

*Advantages: Reduces need for downstream storage facilities or treatment technologies. Reduces flow to wastewater treatment plants by eliminating stormwater in combined sewers. Creates and improves wildlife habitats. Reduces potential for flooding. Improves runoff water quality and community aesthetics. Readily adaptable and expandable. Both social and economic benefits.*

*Disadvantages: Requires maintenance and up-keep in order to stay functional and efficient. Additional structural support may need to be provided for infrastructure such as roof gardens.”*

Does Citizens Energy Group have leverage with wholesale customers to ask whether they would consider implementing regulations and/or conserving forests and other open spaces to reduce the amount of additional stormwater? A logical focus would be those upstream communities such as Lawrence.<sup>115</sup> If the City of Lawrence regulated stormwater discharge as Milwaukee does, this would reduce future flooding downstream. The more that communities in the four counties containing the Fall Creek watershed can work together as a region, the less damage there will be to those who are at the base of the watershed dealing with stormwater and flooding.

Reconnecting Our Waterways: The Long-Term Control Plan refers to the establishment of a regional watershed alliance. Olivia Hawbaker, an engineer with Citizens Energy Group, stated that no regional alliance has been formed.<sup>116</sup> A regional alliance, including businesses, local governments, and water users of different types is what is needed to think beyond structural solutions and benefit neighborhoods. Hawbaker mentioned that Citizens Energy Group participates in the quarterly meetings of Reconnecting to Our Waterways. This group focuses on “changing the quality of life and ecology along Indianapolis’s waterways and surrounding neighborhoods.”

A strategy to consider is that of the Milwaukee Metropolitan Sewerage District (MMSD), which combines structural and nonstructural ways to reduce stormwater and flooding. MMSD’s Greenseams Program includes a robust forest acquisition program, wetland restoration, park acquisition and tree planting program. MMSD could be invited to Indianapolis to discuss the rationale for land purchases and tree preservation which are important for flood water reduction. As Indianapolis prepares for the 2022 Long-term Control Plan, this would be a good

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<sup>115</sup> Citizens Energy Plan Figure 6-1.

<sup>116</sup> Personal communication to the report authors, September 2020

discussion to have soon.<sup>117</sup> Reconnecting Our Waterways meetings may be a great forum to invite progressive sewerage districts to present their nonstructural flood reduction programs. A comprehensive plan, such as what MMSD has creates strange bedfellows and alliances that seem incomprehensible, but it is why there is a great regional system in Milwaukee.

White River Vision Plan: The *White River Vision Plan* is the most visionary of all the plans as it recognizes climate change and the role that conserving forests can play in addressing its impacts, identifies the needs of each reach of the river and the populations who need to be engaged. The plan mentions the players and actions that are needed. It promotes work “to identify forests that are not protected, to assess the quality of the forests, and establish priorities for preserving high quality forests and forest cover in general [to] orient future park selection, acquisition from willing landowners, and other conservation around the highest priority forests on private lands. . . .” (p 69 & 86) However, the plan does not connect to a timetable and mechanism to implement the vision.

Thrive Plan: The City should complete a follow up urban tree canopy assessment within the next few years to ensure that the City’s Thrive 2035 natural resource objectives that support the protection of tree canopy can be achieved. The Thrive Plan Natural Resources Objective 1 states:

*“Green spaces and trees are sustained and equitably expanded.*

*Action 1: Implement a policy to ensure the use of 100% native plants and proactive removal of invasive species in parks and along greenways by 2022.*

*Action 2: Increase green spaces to improve stormwater infiltration and ensure appropriate ongoing maintenance by 2022.*

*Action 3: Plant 30,000 additional native trees by 2025 to increase canopy, reduce runoff and mitigate against the urban heat island, particularly in those neighborhoods in most need.*

*Action 4: Create a per capita spending goal of at least \$50 (up from the existing \$26) to maintain the parks and recreation system through applicable creative financing options and develop steps to move towards this goal.”*

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<sup>117</sup> <https://www.mmsd.com/what-we-do/flood-management/greenseams>

## VI. Conclusion and Next Steps

Indianapolis faces many challenges but also has many opportunities to build a more resilient city. Right now, Indianapolis still has thousands of acres of forest, tree canopy that serves as functioning green infrastructure, with the City's street trees alone providing at least \$9 million in ecosystem services each year,<sup>118</sup> but this infrastructure is under-appreciated and under pressure from development as the City grows. The City of Indianapolis has few ordinances or other provisions in place to protect its urban tree canopy or green infrastructure. More clarity is needed about when development will be allowed and when and where mitigation will occur in order to achieve a balance between economic growth and infrastructure protection.

This report documents the value of urban forests to Indianapolis and the many ways they provide environmental, economic, and social benefits. The report uses mapping as a tool to visualize these benefits and identify priority protection opportunities that consider important factors, such as the ages and natural conditions of forests, the amount of storm water forests will absorb, areas in most need of parks, areas most important to reduce the urban heat island effect, and census tracts with high social vulnerability. Understanding the benefits provided by these forests, some approaching old growth conditions, and matching them with the most appropriate conservation strategies will be the key to successful implementation of this report's vision.

With these opportunities identified, there are an array of potential protection strategies that can be employed based on land ownership, location, and the physical characteristics of these forested properties. There are opportunities to expand existing protected forest by acquiring adjacent properties that increase the size of the protected tree canopy segment and provide multiple enhanced benefits to the City. Protection of riparian buffers and important wildlife habitat provide opportunities to leverage Federal, state, and utility funds for trail completion, open space protection or compliance with the Long-Term Control Plan. In particular, there are major opportunities with Citizens Energy Group and Reconnecting Our Waterways in the White River and Fall Creek watersheds.

This report outlines a variety of implementation strategies. In many cases, significant Indianapolis forest cover is literally in the backyards of homeowners. Home-Owners Association agreements could provide a unified forest management plan for tree maintenance that would educate residents about the importance of forest cover, establish a mutual understanding about forest management, prevent conflict between neighbors, and reduce costs by pooling resources for tree and forest maintenance. In other cases neighborhoods with no parks could be served by purchasing properties to be added to the existing park system. In some instances, acquisition of properties near existing parks could expand public forests and maximize the ecosystem services these parks provide.

Although still in their early stages, an array of programs and markets are emerging where landowners of larger forested properties may be able to receive compensation for maintaining their properties in a forested land cover for the carbon sequestration and other ecosystem services they provide. Small vacant properties with high environmental, social, and economic benefits may also be excellent opportunities to expand the Indianapolis park system. And even

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<sup>118</sup> Tree Management Plan, Davey Resource Group

some municipal- owned non-park lands may present opportunities to maintain and enhance the existing tree canopy for future generations.

The Thrive Indianapolis plan provides an excellent foundation for moving the City toward carbon neutrality by 2050, but it does not provide much detail about how this is going to be achieved. One avenue the City could utilize to help achieve this goal sooner could be by participating in expanding carbon markets, both by purchasing carbon offset credits and encouraging local companies, businesses, institutions and residents to do the same and by enrolling its lands to sell offset credits (in addition to other landowners mentioned above) in those markets. In addition to providing a great incentive to reduce carbon footprints, dollars spent on carbon offsets could be paid into a carbon offset forest fund to support the protection of Indianapolis forests and the co-benefits they provide.

To maintain and improve the quality of life for all residents in Indianapolis, it is essential for the City to increase per capita spending for parks, forests and open space. Indianapolis' spending on the preservation of nature is way behind its peers that it competes with for business relocation and other economic development efforts. Furthermore, an increase in local investment to conserve forests and greenspace will stretch further the funding available to the City from the federal Land and Water Conservation Fund for this objective.

Another means to stretch the forest protection dollars further would be to establish a network of Forest Preserves similar to the Illinois model. This would allow forest protection at a lower management cost per acre than traditional city/county parks while providing an array of benefits including passive recreation, ecological restoration, storm water control, water quality improvements, and the reduction of heat islands.

Key next steps of the Forests for Indy initiative will be to ground-truth potential protection priorities and validate the opportunities. IFA will continue to work through collaborative partnerships with multiple organizations to explore the feasibility of the protection strategies and opportunities outlined in this report, including through local and state trail plans, the Long Term Control Plan of Citizens Energy Group, the Lower Fall Creek Watershed Management Plan, emerging carbon programs and the City's carbon neutrality pledge. IFA will pursue the visions and steps to conserve forests and open space in the White River Vision Plan and existing Quality of Life plans that neighborhood associations have developed. In particular, IFA will continue to reach out to neighborhood and homeowner associations to explain the prioritization process used in this report that recognizes the values of forests in their communities. We will explore, develop and implement conservation plans to protect these forests with these local organizations as well as organizations such as the Central Indiana Land Trust, Mud Creek Conservancy, and Keep Indianapolis Beautiful. And we will engage City leaders in a growing conversation about the initiatives needed to save the forests of Indianapolis for the multiple benefits they provide.

Indianapolis has a long history of urban planning. An article that appeared in the Indianapolis Business Journal several years ago provides inspiration: "George Kessler created a parks and boulevard system for the City in 1909 that interconnected neighborhoods, waterways and parks

with beautiful bridges, parkways and promenades.”<sup>119</sup> Imagine if we embraced that sentiment today to establish a Forest Preserve network that would serve the City in myriad ways in the coming decades. A system of Forest Preserves readily suggests itself when one examines the maps of unprotected forests in the City particularly along its waterways.

Right now, Indianapolis has a window of opportunity to improve its resilience and quality of life by finding ways to protect our existing urban forest. We hope that the robust protection vision for Indianapolis’ most valuable forests outlined here will inspire and empower communities to get involved in protecting their neighborhood forests and that City leaders will act boldly to protect these forests in plans implemented by the City, utility districts, and other partners.

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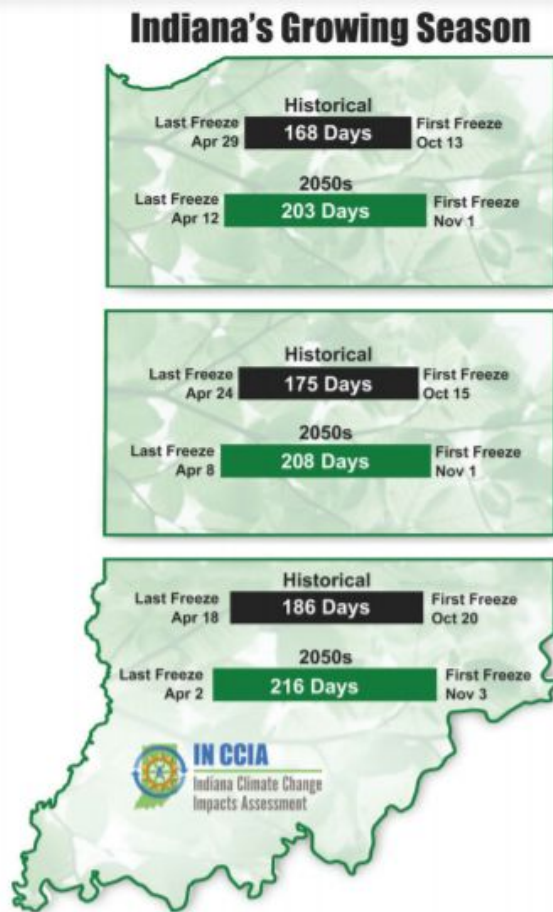
<sup>119</sup> Tom Gallagher, Indianapolis business Journal, URBAN DESIGN: Our parks get a bad rap—even though spending lags. July 20, 2017  
<https://www.ibj.com/articles/64692-urban-design-our-parks-get-a-bad-rapeven-though-spending-lags>



## Appendices

### Appendix 1: Species Shifts Expected

The plant hardiness zones are changing with the climate. It is anticipated that Indiana is moving from Zone 6A to Zone 6B by 2050.<sup>120</sup> These changes will favor some species and ecosystems over others. Several reports document expected impacts on ecosystems.  
*Figure A1: Growing Season are changing<sup>121</sup>*



**Above:** Growing season length and average first/last freeze dates for northern, central, and southern Indiana. "Historical" is the average for the period 1915 to 2013. For future projections, "2050s" represents the average of the 30-year period from 2041 to 2070 for the high emissions scenario. Data for other locations and time periods available. Source: Hamlet et al. (2019).

<sup>120</sup> <https://ag.purdue.edu/indianaclimate/indiana-climate-report>

<sup>121</sup> <https://ag.purdue.edu/indianaclimate/additional-data/> page 4

The ability of Indianapolis to adapt to perturbations in the environment depends on a variety of factors. Forests can help build resilience as described in the Thrive Indianapolis plan and in the previous sections of this report. In general, protecting our urban forests is one of the most important steps we can take to maintain the ecosystem service benefits described above and build resilience. We can also anticipate some of the specific responses of the forest ecosystems and try to prepare for those. Several reports outline the anticipated responses of different tree species, particularly to anticipated impacts of climate change.<sup>122 123</sup> For example, Table 7 was produced by the USDA to describe the vulnerability of various hardwood ecosystems.

*Table A1: Vulnerability of Ecosystems in the Central Hardwoods Region*

Community Type	Vulnerability	Evidence	Agreement
Dry-mesic upland forest	Low-Moderate	Medium	Medium-High
Mesic upland forest	High	Medium	Medium-High
Mesic bottomland forest	Moderate	Limited -Medium	Medium
Wet bottomland forest	Moderate- High	Limited-Medium	Medium
Flatwoods	Low-Moderate	Limited-Medium	Medium
Closed woodland	Low	Limited	Medium
Open woodland	Low	Limited-Medium	Medium
Barrens and savannas	Low	Medium	Medium-High
Glade	Low-Moderate	Medium	Medium-High

The Indianapolis Tree Management<sup>124</sup> plan includes an inventory of all trees in the public right of ways along Indianapolis streets (whether planted or not). This inventory indicates that the street tree population had 92 genera and 249 species represented. In the table 8 below, the tree species listed in the Tree Management Plan are shown in blue as a percentage of the total population, while data from the Forest Inventory Analysis compiled from test plots across the state are shown in red.

The primary species represented in the Indianapolis Tree Management Plan are listed in this Table A2, along with their vulnerability as reported by the Morton arboretum.<sup>125</sup> The Tree Management Plan also makes recommendations about which tree species would be most advantageous to plant.

*Table A2: Species listed in Tree Management Plan*<sup>126</sup>

Species	% of total Trees	Overall Vulnerability	Confidence

<sup>122</sup> <https://climateframework.org/assess/ecosystem-vulnerability/urban>

<sup>123</sup> <https://www.fs.fed.us/nrs/atlas/>

<sup>124</sup> Davey Resource Group. 2016. Tree Management Plan: City of Indianapolis, prepared for the Department of Public Works. Copy available upon request from IFA.

<sup>125</sup> Chicago Wilderness region urban forest vulnerability assessment and synthesis: a report from the Urban Forestry Climate Change Response Framework Chicago Wilderness pilot project <https://www.nrs.fs.fed.us/pubs/54128>

<sup>126</sup> Davey Resource Group. 2016. Tree Management Plan: City of Indianapolis, prepared for the Department of Public Works. Copy available upon request from IFA. p 23

Silver Maple	7.54	low to moderate	medium-high
White mulberry	5.34	low to moderate	low
White ash	5.24	moderate to high	low-medium
Sugar maple	5.15	moderate	medium
Callery Pear	4.81	low to moderate	low
Northern hackberry	4.54	low	high
Green ash	3.84	moderate	medium-low
Red maple	3.73	low-moderate	medium-high
flowering Crabapple	3.48	moderate	low
Siberian elm	2.94	low to moderate	medium-high
Eastern white pine	2.92	high	high
Blue Spruce	2.53	moderate	low
Eastern redbud	2.29	low to moderate	medium-high
Norway spruce	2.01	moderate	low
Northern red oak	2.01	low-moderate	medium
Plum species	1.91	moderate	low-medium
Eastern red cedar	1.8	low to moderate	medium-high
Arborvitae species	1.74	moderate to high	low
norway maple	1.71	moderate	low
Black walnut	1.54	moderate	medium
thornless	1.53	low to	medium-high

honeylocust		moderate	
Ash species	1.31	moderate to high	low-medium
Hawthorn species	1.23	moderate	low
Black locust	1.21	low	high
Boxelder	1.2	low	high
Black cherry	1.15	high	medium-high
American elm	1.08	low to moderate	medium-high
Sweetgum	1.05	low to moderate	low-medium
Tulip tree	1.03	moderate	low-medium
American sycamore	1.03	low to moderate	medium
Eastern cottonwood	1.02	moderate	high
Others (215 spp)	20.07		

## Appendix 2: Case Studies on Forest Protection

This section includes examples of forests in Indianapolis that have been under threat from development. These examples demonstrate public support for forest protection and some very different outcomes.

### Crown Hill



In the late summer of 2016, the Indianapolis community got wind of a Veterans Administration plan to displace and destroy an old-growth forest with a concrete memorial to be built in Crown Hill Cemetery’s North Woods. Forests matter to people and Indianapolis residents have shown that this particular forest matters much more than most. City residents have engaged in two ferocious uphill battles to protect this forest.

On September 20, 2016, the Indiana Forest Alliance and other members of the coalition to save Crown Hill Cemetery North Woods met face to face with VA officials from Washington. At this meeting and later at a public meeting hastily convened by the VA in the face of public protests, the officials unveiled their design plans—which were 95% done, at a total investment to date of nearly \$2 million. The VA made clear their intentions to go forward with the project that was supposed to honor veterans, unless the top brass at the VA i.e., Veterans Secretary Robert McDonald (robert.a.mcdonald@va.gov), told them to hold up and look at alternatives. The Crown Hill North Woods has great ecological and community value. A portion of this forest is likely a remnant from pre-settlement times as it was part of an extensive wetland described in the General Land Survey of 1820s. Dr. Donald Ruch, Dr. Kemuel Badger, and John Taylor of Ball State University biology department conducted a site assessment in which they stated: “[all efforts should be made to conserve this example of Indiana’s natural heritage.](#)” A Floristic Quality Assessment, completed by Butler University biologist Dr. Rebecca Dolan and plant expert Kevin Tungesvick, shows that the vegetation in the Crown Hill North Woods ranks comparably to that of the highest quality nature preserves in central Indiana.

In December, with demolition of the Woods set to begin in early 2017, IFA and neighbors to the Woods filed a lawsuit in federal court asserting that the VA had violated the requirement of the

National Environmental Policy Act (NEPA) for federal agencies to examine alternatives to federal actions that have a significant impact on the environment. The lawsuit and an attempt to obtain a preliminary injunction were dismissed in January when the court ruled that the VA had complied with NEPA.

On March 13, 2017, twelve citizens, residents of Indianapolis calling themselves the Crown Hill Forest Protectors, risked arrest to stop construction and tree clearing at the site. They walked into the woods by a pile of gravel, down a dirt path bulldozed into the woods and saw marked trees, the great majority of which were marked to be felled. After the Indianapolis Police Department cordoned off the area but would not arrest the citizens, The VA issued a stop-work order that day. The Indiana Forest Alliance organized hundreds of calls to elected officials. [School children spoke bravely to the TV cameras about the value of the trees](#). Veterans pleaded with the Veterans Administration not to destroy “this old growth forest” in their name. On May 5, after behind-the-scenes efforts by Indiana’s U.S. congressional delegation, the VA announced it would build its project in the empty acreage adjacent to the woods. This reversal followed months of advocacy, marches, pickets and vigils, including thousands of phone calls to officials from friends and members of the Indiana Forest Alliance.

Thanks to the urging of thousands of citizens as well as Indianapolis Mayor Joe Hogsett, Senator Joe Donnelly, and Representative Andre Carson, the VA and Crown Hill Cemetery finally selected a new site for the veterans columbaria. The Crown Hill Woods is safe for now.



### Haverstick Woods

For example, a proposal to construct a commercial development on a 13-acre wooded plot near the intersection of Keystone Avenue and 86th Street known as Haverstick Woods, triggered controversy. In October of 2017, the Metropolitan Development Commission ruled against a zoning change that would allow commercial development due to concerns over the removal of trees from the heavily wooded site, among other things. The MDC decided to continue to enforce a tree preservation plan previously approved for the site that required that any trees removed be replaced by trees planted in the immediate vicinity of the woods on a caliper inch by caliper inch basis. This decision was heavily supported by citizens from the surrounding Driftwood Hills neighborhood who had remonstrated against the proposed development. However, under pressure from the developer, in April 2018, the City-County Council [voted to override the MDC decision and approve](#) the zoning change. That decision was appealed to court by Driftwood Hills residents. In May of 2020, a Johnson County Circuit judge ruled that the City-County Council erred when it used the procedure to renegotiate the project, which had been denied, without sending it back to the Metropolitan Development Commission for a public review. This decision vacated the approval of the development and the zoning change, but most of the trees had already been removed from the site by then.

### Eastwood Oak

A staff member at [Eastwood Middle School](#) in Indianapolis alerted IFA about an old, majestic bur oak tree in harm's way — due to plans for a new parking lot. "I would like the tree to be saved," wrote school counselor Kelly Spiegel. Kelly sent photos and IFA posted them on social media. [Forests for Indy](#) Project Director Jerome Delbridge went to inspect the tree. "This bur oak is 53.7" diameter, 80' tall," he reported. "I didn't see any significant health or structural defects with the tree. The limbs spread nearly 100 feet wide. I would put the age of the tree at 225 to 250 years old, with the assumption it was a forest tree, pre-1900. What a treasure!"

Eastwood alumni remembered this tree. They contacted school officials to make a case for saving the tree. Other forest advocates asked [Schmidt & Associates](#) (the project architect/engineers) to re-imagine the project to accommodate the tree. IFA Board President Elizabeth Mahoney quickly issued a passionate e-mail to the superintendent of Washington Township Schools, Dr. Nikki Woodson:

"I am writing to you today to respectfully request that your School District and the Eastwood Middle School re-evaluate your decision to cut down the beautiful old oak tree for a parking lot. Indianapolis is so very low in ranking per capita of green space and trees. It is a shame and a horrible thing to destroy this beautiful part of Eastwood school's natural history. Climate change is real. Big trees like this clean our air by removing particulates, sequesters CO2 and creates clean breathable oxygen for humans and animals alike, not to mention they are a food source and habitat for birds, squirrels, bats and insects. Additionally, a tree of this size and maturity soaks up thousands and thousands of gallons of water annually and helps your school with water run off issues during our increasingly torrential rain falls, another side-effect of global warming.

This was and should be a teachable moment for your students. Just because this tree is located in an area where it's most convenient to locate a parking lot does not mean that you should locate the parking lot there and that the tree must be cut down.

Your architectural planning committee could, in conjunction with an arborist, leave enough area around the tree to save the tree, create a beautiful landscape feature and still have functional parking lot. So what if it eliminates a few parking spots!

Additionally, teaching students to always take the easiest, cheapest and least creative path is not ideal. There are always multiple ways to solve problems. Teaching exploration, creative process solutions and working a little harder to solve a problem is always the better path. I'm sure you would agree.

Please do not cut down this tree for a parking lot. It teaches your students that nature, our environment, is unimportant and that it is simply something to be dealt with and controlled as opposed to something important for our minds, bodies and spirits. We humans ARE nature. We are all part of the cycle and the impact we have on the planet today will be felt for generations to come."

[FOX 59 News](#) came out to cover the tree's fate. "I think there is always an alternative where we can co-habitat with the nature around us," said Jerome Delbridge, an ISA certified arborist. Eventually, the school embraced the idea and developed alternative options to allow construction to take place around the oak tree."



### Temple Oak

In the Springdale neighborhood on the east side, at Temple and Brookside, stands a chinkapin oak tree that is believed to be 400 years old, stands 70 feet tall and has a canopy 75 feet wide.<sup>127</sup> The tree has been an icon and symbol of stability for the neighborhood. In 2007, it was named the City's most huggable and remarkable tree, and former Mayor Bart Peterson declared it historic and majestic.<sup>128 129</sup> The property where the tree is located includes a private residence that has been recently renovated. IFA is pursuing a conservation easement on the property with the current landowner.

### Appendix 3: List of Top 100 Priority Forests

Number	Name	Location/Description
1	North Side Ft. Ben on Fall Creek	North Side Ft. Ben on Fall Creek
2	Indian Lake	Adjacent Ft. Ben NE side
3	Wood Branch	Adjacent Eagle Crk. Golf club SW
4	Headwaters Lawrence Creek	Adjacent Ft. Ben Southwest. Lawrence Creek Boy Scout Rd.
5	Paddle Creek & Sheets Crk	S. of 96th street W. 96th and Moore rd.
6	White River Wicker Rd.	Wicker Rd. opposite side of river from Southwestway Park & Winding River Golf Course
7	Swamp Creek / White River	Adjacent Southwestway Park south side
8	Charlesmac Run	Adjacent Southeastway Park eastside, off Southeastern Ave.
9	Sargent Brook	South of 96th Street at Sargent Rd.
10	Eagle creek Sliver	Sliver along Eagle Creek Park along 465 and 52
11	Fall creek - Brendonwood	Fall Creek Parkway N Brendonwood Country Club Lake Kesslerwood
12	Fishback Creek	E. CR 950 North, South of W. 82nd Street
13	White River - Crows Nest	
14	Chapel Run	E. Vandergriff Rd.

<sup>127</sup>

<https://www.indystar.com/story/news/2018/06/04/forests-indy-how-new-project-hopes-protect-indianapolis-trees/657368002/>

<sup>128</sup> <https://www.wfyi.org/news/articles/neighborhood-rallies-around-temple-oak>

<sup>129</sup> [https://www.monumentaltrees.com/en/usa/indiana/marioncounty/17831\\_templeaveandbrooksideave/](https://www.monumentaltrees.com/en/usa/indiana/marioncounty/17831_templeaveandbrooksideave/)

15	Sargs Run, mud creek	Lantern Rd. and E. 82nd
16	S. end of Geist Reservoir	N of 79th at Fall Creek Rd.
17	Hare Ditch	N of Southwestway Park
18	Big Eagle Creek	W. 79th and N. Moore Rd.
19	Fall Creek at Scout Branch/Woollen Run	Adjacent to Ft. Ben on West Side
20	Grassy Creek and Brier Creek	Adjacent Whispering Hills Golf Course, S. of Brookville Rd.
21	Lincoln Crk, Clermont, S. of Eagle Creek Reservoir	S. of 74, S. of Oceanline Drive
22	Sarg's Run, Mud Creek	Between 86th and 82nd, near Geist Rsvr.
23	Big eagle Creek	S.of 86th near Geist
24	Mud creek	N. of Fall Creek Rd, 75th St. at N. Sargent Rd.
25	Cam Branch of Camby Creek and Marihen Creek	Off S. Kentucky Ave at Camby Rd.
26	Fishback Crk, Block Creek	Between Lafayette Rd and I665 just north of W. 86th St.
27	Union Creek, eagle Crk.	N Girls High School Rd. btwn 21st Street and Crawfordsville Rd.
28	Alverna Creek	S. of 86th at Springview Dr.
29	buck Creek, N. of Paul Ruster Park	Munsie Rd. Muessing Rd. S. of Washington St.
30	Eagle Creek Sliver	Weird sliver of Eagle Creek Park
31	Swamp Crk and Goose Crk, adjacent Winding River Golf Course	Mann Rd at West Ralston Rd.
32	Hook Crk, Reel Cr, Fishback Crk.	W. 82nd Street and Wilson Rd. W. of I-65
33	Meridian Hills, Williams Crk	Hook Crk, Reel Crk, Fishback Crk.
34	White R. Highwoods	Highwoods, S. of 52nd Street, opposite Rocky Ripple, just S. of Highland Golf and Country Club
35	Acton Run. (Indian Creek?)	Between Southeastern Ave and Southport Rd. , East Indian Crk Rd.
36	Bush's Run, Part of Eagle Creek Park sliver	W. 71st Street at Eagle Crk. Park

37	India Branch, Indian Creek near Indian Lake	E. 75th at sunnyside Rd. , Old Oakland Golf Course
38	Big Eagle Creek	n of I 65 . S of W. 79th
39	Opossum Run, Grassy Creek, Zion Creek	E. 75th at sunnyside Rd. , Old Oakland Golf Course
40	White River	Butler University, 42nd-52nd
41	Alverna Creek	W. 86th, S. of 91st
42	Orme Ditch	Bluff rd. and Stop 11, S. Belmont and S. Timber Hill Drive
43	Augusta, Crooked Creek	Between 79th and Westlane Rd.
44	Muesing Creek	Adjacent Paul Ruster Park on S. Muessig Rd and S. German Church Rd.
45	Dry Run Creek , Howland Ditch	N of 75th at Allisonville Rd.
46	Mill Pond, Traders Point	Traders Point, S. of 82nd east of I 65, West of Lafayette rd.
47	Dollar Hide Creek, White River	W. Banta Rd.
48	East Fork White Lick Creek	Westwood, n of W. 10th St.
49	Fall Creek	N of E 46th St. Mallard View Lane
50	White River, N. Crows Nest	Crows Nest, adjacent Holiday park (south), N of W. Kessler Blvd West Drive
51	Dollar Hide Creek	n. of West Southport Rd. at Mann Rd.
52	Williams Creek	Between 86th and 96th St on Spring Mill Rd.
53	Little Buck Creek	N. of East Southport Rd. at S. Arlington Ave
54	Ficher Ditch, Zion Creek	S. of Whispering Hills Golf Course, N. of E. Troy Ave at s. Davis Rd.
55	Colton Creek	N of 86th E. of Moore Rd.
56	Behner Brook, W. Fork white River	96th and Allisonville Rd.
57	Lake Branch & Quill Creek	Mooreville Rd. East of Kentucky Ave
58	Coon Run, Zion Creek	East Raymond Ave east of Post Rd.
59	Dogwood Remnant	Rawles Ave west of Post Rd.
60	Harmon Ditch	East of Mann Rd at Thompson Rd.
61	Meridian Creek	East of Spring Mill Rd at W. 81st
62	White River Clearwater Oxbow	north of E. 82nd St.

63	Gray Run	E. Southport Rd at I 65
64	Crooked Creek	Knollton Heights, Adjacent south of Broadmoor Country Club
65	White River Allisonville	Riparian corridor West bank White River. S. of 96th st
66	White River est of Coldspring Rd.	W of North Michigan Rd. opposite Shooters hill
67	Goose Creek and Newton Branch	Camby Rd at Mooresville Rd.
68	Skiles	Johnson Rd. W. of 465 at Fall Creek Rd. West of Skiles Test nature park
69	Pistol Run	E. 59th and Post Rd.
70	Lick Crk	S. Kitley Ave, south of Brookville Rd.
71	Lick Creek, Sunnyview	West of S. Arlington Ave and s of E. Minnesota St.
72	Big Eagle Creek, north	Fischer Ditch, Zion Creek
73	Davis Creek, Seerley Creek	Kentucky Ave and Lynhurst
74	White River, Sunshine Gardens	s. of 74, west side of white river
75	Falcon Creek	Weird sliver just north of 56th Street at N. High School Rd.
76	Lick Creek, White River confluence	Riparian , just south of IPL
77	Little Buck Creek	north of E. Shelbyville Rd.
78	Mud Creek	W. side of north Sargent Rd.
79	Hare Ditch	S. Belmont Ave
80	Fishback Creek	W. of 65 at Traders Point
81	Crown Hill East	S of 38th at Boulevard Place
82	Bailey Creek	E. 71st at Dean Rd.
83	State Ditch	Mann Rd. at Superior Rd.
84	Maze Creek (Little Sugar Creek?)	East Maze Rd and Dix Rd.
85	Sawmill Run and Sinker Creek	West of I 65 between 82nd and 86th
86	Little Eagle Creek, Speedway	Speedway, adjacent Brickyard Crossing Golf Course
87	White River	Tiny sliver across river from IMA
88	School Creek	Across Epler from Carson Park
89	Dry branch, SE of Geist Rsvr.	East 79th at Oaklandon Rd.
90	Crooked Creek	Adjacent to Juan Soloman Park (north of W. 62nd

		Street).
91	Buck Creek, Creekbend	W. Edgewood Ave and S. Meridian
92	Crown Hill North Woods	White River, Shooters Hill, S. of W. 42nd St.
93	Crooked Creek, overlook	S of 42nd on Cooper Rd.
94	Salem Creek, E. Fork white Lick Creek	W. Morris St. at Bridgeport Rd.
95	Crooked Creek, Broadmoor	Knollton Rd and W. 56th St just east of Broadmoor Country Club
96	White River Wynnedale	Between 42nd and 44th
97	Williams Creek, S of Marrott Park	E. 71st St at William creek Drive
98	Dollar Hide Creek, Milhouse Drive	West of Mann Rd.
99	Big Eagle Creek	S. of 79th at Noel Rd.
100	Grassy Creek, German church	North of E. 30th St at N. German Church Rd.

**TO:** Kathleen Blackham, Senior Planner, Department of Metropolitan Development  
Nancy Whitaker, Hearing Specialist, Department of Metropolitan Development  
Councilor Brienne Delaney

**FROM:** Lori Miser, former two-time department of public works director under Mayor Ballard and Mayor Hogsett and former Executive Director of the Indianapolis Metropolitan Planning Organization

**SUBJECT:** Opposition to Rezoning Case Numbers 2024-ZON-073 and 2024-ZON-073B

Good day and thank you for the opportunity to comment on rezoning cases 2024-ZON-073 and 2024-ZON-073B. Our family has lived in the Knollton Road / High Knoll Estates area for 35 years. We moved here in 1990 because it was the perfect place to raise our family, it was close to work, downtown and the greater Broad Ripple area and it provided a quiet, tree-filled, natural environment in the heart of Indianapolis. Our neighbors, who have also jointly lived in the area for many years, express the same sentiment.

**We are vehemently opposed to these rezoning proposals for the following reasons:**

#### **DENSITY**

The proposed density completely compromises the integrity and merit of our current zoning district guidelines. A significant amount of time and effort was spent on developing the most current Comprehensive Plan that was adopted by the Metropolitan Development Commission. Public engagement comprised a significant component of that work and should not be easily dismissed or taken for granted.

The intention of this proposal is to change the zoning of 13.69 acres from its current SU-34 zoning (Special Use classification which permits certain club, fraternity and lodge, and ballroom uses [that are compatible with and commonly associated with golf course and country club uses]) to D5-II and D4 zoning. The residential properties south and east of the 13.69 acres (a) is zoned DS, Dwelling Suburban which requires a lot size of 1 acre per single-family home and (b) has been developed with lots of at least one acre, several of which are substantially larger than one acre. The proposed rezoning would be for 43 residential lots with 15 lots having an area as small as .115 acres and 28 lots having an area as small as .058 acres – dramatically different than the one acre (or more) lots surrounding the 13.69 acres. The Indianapolis Comprehensive Plan has a recommendation for Regional Special Use for this property and does not recommend anything close to the high-density residential use being sought.

An item of particular note is the fact that once the 43 lots are sold, the current owners will not be the home builder or developer. Thus, if the zoning change is approved, the developer will be able to build whatever they want and sell the homes for whatever they can. This will result in a significant impact on the surrounding character of the area and on property values.

We feel strongly that this proposal is significantly out of character with the surrounding neighborhoods and inappropriate for this area. The purpose of zoning laws is to regulate how land can be used within a community, preventing incompatible land uses from being placed next to each other, thereby protecting property values, maintaining the character of neighborhoods, and promoting the health, safety, and welfare of residents by managing urban growth and development.

We applaud the extensive work that was done during the update to the Comprehensive Plan and corresponding zoning code that was adopted by the Metropolitan Development Commission. We believe that Broadmoor Investments should be required to respect and abide by the current zoning regulations.

Finally, Marion County can't afford to keep bleeding population to the surrounding counties. Unfortunately, that is a distinct possibility if the existing planning standards that were carefully conceived, publicly vetted and adopted for the county are eroded without good reason and justification.

## **DESIGNATION AS ENVIRONMENTALLY SENSITIVE AREA**

This area is also designated environmentally sensitive due in part to the large, dense area of older tree growth, the varying topography and the proximity to Crooked Creek. The municipal code also requires heritage tree conservation and serious consideration needs to be given to preserving as many of the mature trees as possible in this area. The proposed development plan would destroy almost 8 acres of woodland and remove the large majority of trees in that area.

## **TRAFFIC**

One important point is that the proposed change in access for the country club (moving the entrance from Kessler Boulevard to Knollton Road) was not really addressed in the traffic impact study (TIS). It seems prudent that DPW would require more detailed analysis if that change in access is being pursued.

I would like to point out the following concerns:

- Knollton Road is a narrow two-lane secondary arterial that has no shoulders and no sidewalks for pedestrians. The topography of Knollton Road is rolling and sight distance concerns are common for traffic exiting onto Knollton Road from adjacent driveways. The escalation in traffic from the Broadmoor plan would increase risk to residents along Knollton Road as well as other drivers.
- The focus of the TIS was very narrow – one hour counts for weekday AM and PM peak hours and Saturday midday peak hour. The traffic count numbers are unbelievably low for ingress and egress to a large, popular country club, even if the numbers are increased 50% “in an effort to provide a conservative and accurate analysis”.
- Likewise, the forecasted 2034 traffic count numbers are also incredibly low to / from the country club access drive. How can that be correct for a major facility like this?
- The stated purpose for closing the access drive to Broadmoor on Kessler Boulevard is to extend the driving range west so that it can be certified / meet PGA tournament specifications. What traffic will be generated by those tournaments and how will that impact conditions on Knollton Road and the intersection with Kessler Boulevard?
- Our neighborhood group strongly opposes closing the Kessler Boulevard access to Broadmoor and would like to see it remain the main and only access point. There appears to be room for them to relocate the existing drive to the west and still expand the driving

range to meet PGA requirements. The existing driving range is 280 yards and the PGA minimum is 300 yards.

- There is also no discussion in the TIS about other vehicles that need to access the proposed development via a new intersection on Knollton Road. What about delivery vehicles, service vehicles and emergency vehicles? There is no recommendation for a passing blister or any accommodation for larger vehicles to access the site. Will emergency vehicle access be considered / discussed with public safety representatives?
- There is no discussion of traffic heading south on Knollton. If that traffic ultimately ends up at 51st and Michigan that intersection is a concern because it's offset and has its own set of safety issues. It seems that location should weigh into these considerations as well.
- Regarding additional traffic on Knollton Road, we are extremely concerned given the narrow width, the rolling hills and the site distance issues created by the natural terrain.
- Traffic entering Kessler Boulevard from Knollton Road is currently problematic and challenging with the existing traffic levels, limited sight distances, and speeds on Kessler Boulevard. Knollton Road intersects Kessler Boulevard on a reverse curve, meaning there are curves in both directions, which reduces sight distance and renders the intersection more dangerous. The intersection is controlled by a stop sign at Knollton Road and adjacent to an Indianapolis Fire Department station and Crooked Creek elementary school, creating additional conflicts for traffic flow in the area.
- All travel to the proposed entrance on Knollton Road from the south also requires using narrow two-lane secondary roads without shoulders (51<sup>st</sup> and 44<sup>th</sup> streets) that have challenging access to main arterials.
- Finally, if all of this is approved as proposed, Knollton will see intense traffic during construction. Who is responsible for restoring the road to its original condition? Will that become part of the commitments for this development?

In summary, this proposal is grossly inconsistent with existing zoning and land use plans and would negatively impact the surrounding property owners and natural areas. The proposal also has not been examined in the detail required for such a major change from a traffic impact perspective.

Please vote NO on this proposal for all the reasons stated above.

Thank you,

Lori and Craig Miser  
Residents of the High Knoll Estates neighborhood at 5208 Roland Drive



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Lori and Craig Miser  
Residents of the High Knoll Estates neighborhood at 5208 Roland Drive

## Blackham, Kathleen

---

**From:** Matthew Cremer <matthewjcremer@gmail.com>  
**Sent:** Monday, December 30, 2024 3:52 PM  
**To:** Uhlenhake, Robert  
**Cc:** Blackham, Kathleen  
**Subject:** Re: 2155 Kessler BLVD West Dr - 2024-ZON-073 (& 073B)

Thank you, Robert. Sharing a couple more notes for Kathleen. You don't have to engage me in a back and forth on this as I am sure these emails are hitting your inbox non-stop. However, if you could consider my points below in your opinion, that would be appreciated.

I was just sent a general site plan, which currently shows less units than being petitioned for. I would assume they would have the right to increase that should this pass. I noticed that nearly 20% of this land area is including an existing retention pond, which is currently serving Broadmoor CC. Which allows for the density/acre calculation to allow for more units from how I understand this to work. Which is probably all proper, but is interesting to note since this related ownership party chose to put it in this detention pond in this development and not leave in BCC's land tract. I assume that planning would later weigh whether this detention pond would be considered satisfactory due to it serving a neighboring property or if a 2nd detention pond would be required. This is probably irrelevant today as it stands to a zoning appeal, but is certainly all part of my concern here. If not, it would be **highly** recommended in my opinion to have an engineering study performed on stormwater that considered the surrounding area. This could really help bring some clarity to the situation before an approval was given.

I do think some kind of single family development could happen here, but with a more appropriate zoning class with something like 2-3 units / AC with proper drainage facilities installed. I am in apartment development so generally I am on the flip side of this, so know that these thoughts come from someone who is generally pro-density!

5 UN/AC - D-5II x 7.68 AC = ~38 units  
4.2 UN/AC - D-4 x 6.01 AC = ~25 units  
Total 63 units allowed. 43 are proposed on their site plan.

On Mon, Dec 30, 2024 at 2:20 PM Uhlenhake, Robert <[Robert.Uhlenhake@indy.gov](mailto:Robert.Uhlenhake@indy.gov)> wrote:

Hello Mr. Cremer,

Thank you for your letter. A copy will be placed in the file for the Hearing Examiner to review.

After several continuances, this petition is still active and is scheduled to be heard on January 9. Kathleen Blackham is still the planner assigned to this petition and is copied on this email if you have any follow up questions.

**Robert Uhlenhake** | Senior Planner

Division of Planning | Department of Metropolitan Development | City of Indianapolis  
[Robert.Uhlenhake@indy.gov](mailto:Robert.Uhlenhake@indy.gov) | [indy.gov/DMD](http://indy.gov/DMD)

Talk to a planner: [planneroncall@indy.gov](mailto:planneroncall@indy.gov)

Land Use Petition Forms and Fees: <https://www.indy.gov/activity/land-use-petition-forms-and-fees>

Submit a petition: <https://www.indy.gov/form/land-use-petition-submission>

DMD Municode meetings/agendas: [Department of Metropolitan Development Agendas/Minutes](#) | [Meetings Portal - Indianapolis and Marion County \(municodemeetings.com\)](#)

**[Citizen Access Portal](#)**

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**From:** Matthew Cremer <[matthewjcremer@gmail.com](mailto:matthewjcremer@gmail.com)>  
**Sent:** Monday, December 30, 2024 2:00 PM  
**To:** PlannerOnCall <[PlannerOnCall@indy.gov](mailto:PlannerOnCall@indy.gov)>  
**Subject:** 2155 Kessler BLVD West Dr - 2024-ZON-073 (& 073B)

Hello,

I am writing to express a few concerns about the petition below.

I understand that Council requested a traffic study completed. I hope that this study considers the impact this development would have on the intersection of Kessler and Michigan. If this type of density would be added, it certainly will back up traffic along Kessler West and East bound making westbound travelers on Kessler stuck at the Michigan intersection. It would also make the a similar backup on East bound Kessler and those traveling north on Knollton would have an impossible time making a left or right. Overall, this would be a very very bad development for an intersection that is not setup for this type of increase in traffic, and struggles to handle existing. Will the traffic study be made public?

Additionally, this density is very out of place for this area. This a larger lot, single family area where very few homes have under .5 AC. It is very wooded as well. The D5II and D4 zoning standards would allow a very out of place development to occur. We own a home nearby and specifiically bought in this area to avoid densely populated parts of the city. This area is pretty much all D2 and D3, so I don't know why a precedence of picking a random land site that is not well setup for traffic should be the outlier D4/D5II.

Another concern is regarding drainage. There would be considerable deforestation and paving done over a very large land site which would be concerning for Stormwater control. I am not sure if Storm is setup for the kind of flow this will create. There is currently already challenging storm water issues along Knollton and crooked creek. I believe that owners south of this development will see further flooding issues if more water is diverted to crooked creek in rain events or more flooding on Knollton road.

Hopefully this message can be passed along to Kathleen Blackham, who was the reviewer back in August at the time of the original petition.

Thanks!

2024-ZON-073 | 2024-ZON-073B | 2155 Kessler Boulevard, West Drive | Granted Continuance to January 9, 2025  
Washington Township, Council District #2 Broadmoor Investments, LLC, by Russell L. Brown Rezoning of 6.01 acres from the SU-34 (FF) district to the D-4 (FF) district to provide for residential uses. Rezoning of 7.68 acres from the SU-34 district to the D-5II district to provide for residential uses.

--

Matthew J. Cremer

317.525.1467

--

Matthew J. Cremer

317.525.1467

## Blackham, Kathleen

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**From:** Kerry Michael Manders <kmmanders22@gmail.com>  
**Sent:** Monday, December 30, 2024 12:09 PM  
**To:** DMDpubliccomments; Blackham, Kathleen  
**Cc:** Delaney, Brienne; Lana Gersich  
**Subject:** Opposition to Petition 2024-ZON-073 & Petition 2024-ZON-073B (2155 Kessler Blvd. W. Dr.)  
**Attachments:** Petition 2024-ZON-073 & 2024-ZON-073B (5100 Knollton Road).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.

Greetings,

Attached below is the Crooked Creek Community Land-Use Committee's letter opposing Petition 2024-ZON-073 & Petition 2024-ZON-073B (2155 Kessler Blvd. W. Dr.). **The Crooked Creek Community Land-Use Committee voted unanimously to oppose approval and requests denial of Petition 2024-ZON-073 & Petition 2024-ZON-073B.**

Please see that this letter is added to the file and made available to Staff and Hearing Specialist Nancy Whitaker.

Thank you in advance for your consideration,

Kerry

Chair, Crooked Creek Community Land-Use Committee

Kerry Michael Manders  
P. O. Box 68032  
Indianapolis, IN 46268  
(317) 253-8816

Sagamore of the Wabash  
The President's Volunteer Service Award  
Indiana University/School of Liberal Arts Distinguished Alumnus Award  
C4's Visionary Trailblazer Award

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

December 30, 2024

Hearing Examiner, Metropolitan Board of Zoning Appeals  
200 W. Washington Street, Suite #1842  
Indianapolis, IN 46204

Re: Opposition to Petition 2024-ZON-073 & Petition 2024-ZON-073B (2155 Kessler Blvd. W. Dr.)

Greetings,

I am writing concerning Zoning Petitions 2024-ZON-073 & 2024-ZON-073B (2155 Kessler Blvd. W. Dr.), seeking to rezone this site to accommodate 43 residential lots. The Crooked Creek Community Land-Use Committee **unanimously voted to oppose the approval of these Petitions** for the following reasons:

This request to rezone 14 acres along Knollton Road for a development that would require a rezoning allowing up to 5 houses per acre is inconsistent with the Comprehensive Plan and surrounding neighborhoods, which is zoned D-S, requiring 1 house per acre. Our Community's Land-Use Committee believes seeking rezoning that allows for 5 houses per acre is unreasonable and would have an unnecessary negative impact on the value and character of adjacent neighborhoods and the greater Crooked Creek Community in general.

The increased traffic on Knollton Road, a secondary arterial, from this proposed housing development would significantly increase area traffic issues. Traffic from Broadmoor Road would empty dozens of additional cars daily by country club members driving directly onto Knollton Road from the club. When Broadmoor was developed, it was prohibited from access to Knollton Road for the following reasons: Knollton Road is residential, narrow, with no shoulder, has poor lighting and already has a high volume of traffic. Additional traffic from this site is problematic.

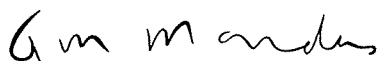
Increasing traffic would back-up the intersection of Knollton Road and Kessler Boulevard (an already difficult intersection), as well as impact traffic at 51st Street and Michigan Road, which is a very dangerous intersection due to west bound drivers recklessly turning south on Michigan Road (which has no turning arrow despite decades of requesting one). Not only does this development potentially endanger drivers — it would also endanger a well-established route for large groups of Central Indiana Bicycling Association (CIBA) bicyclists, as well as independent bicyclists, regularly traveling Knollton Road to 51st Street and through the Michigan Road & 51st Street intersection.

Additional concerns include drainage and tree preservation. Broadmoor has a long history relating to their detention pond leaking. Clearing acres of woods and building 43 homes will result in increasing water run-off, creating additional drainage issues for surrounding homeowners — impacting the capacity of flood-prone and erosion-prone Crooked Creek. Our Community values tree preservation due to flooding, environmental and aesthetic concerns.

We are not opposed to Broadmoor Country Club seeking to redevelop a portion of its property — altho we believe **this proposed development is inappropriate** for the surrounding neighborhoods and the greater Crooked Creek Community **due to its proposed density, drainage, tree preservation and traffic/bicycle safety concerns**. The density of this development should not be as inconsistent with the surrounding neighborhoods — which, if approved would create drainage, safety and traffic hardships for neighbors and the greater Crooked Creek Community.

**The Crooked Creek Community Land-Use Committee unanimously opposes approval and requests denial of Petition 2024-ZON-073 & Petition 2024-ZON-073B.**

Thank you in advance for your consideration,



Kerry Michael Manders, Chair  
Crooked Creek Community Land-Use Committee

CC: City-County Councillor Brienne Delaney



## Blackham, Kathleen

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**From:** Scott Monk <samonk03@yahoo.com>  
**Sent:** Monday, December 23, 2024 7:24 PM  
**To:** Blackham, Kathleen; Whitaker, Nancy G.; Delaney, Brienne  
**Cc:** Lana Gersich  
**Subject:** Opposition to proposed Broadmoor development - 2024-ZON-073 and 2024-ZON-073B

Dear Kathleen, Nancy, and Councilor Delaney -

I am writing to you to voice my strong opposition to the rezoning and development plan proposed by Broadmoor Investments, LLC, for the Broadmoor Country Club property on Knollton Rd – case numbers 2024-ZON-073 and 2024-ZON-073B.

My family and I have lived at 5425 Knollton Rd for 19 years, and our house is directly across from the site that is proposed not only as the entrance for the 43-house development but also as the new entrance for the entire Broadmoor Country Club.

Like many other families in this area, we moved to our current home because of the very large lots and amazing natural setting that this enables. This area has one of the oldest contiguous residential woodlands in Indianapolis, with a dense canopy of towering native trees and carpets of wildflowers in some areas throughout the spring and summer. On our 2 acres alone, we have many trees well over 100 years old and an incredible variety of native plants. This sizeable area of woodlands also supports a large variety of animal life, another attribute that so many families love about this neighborhood.

The distinctive natural setting of this neighborhood just minutes from downtown is dependent on large lots that allow much of the woodlands to be maintained. The Broadmoor rezoning and development plan is for high density housing, with the majority of the planned lots being only 1/17th of an acre. This would result in the destruction of almost 8 acres of woodland and removal of the large majority of trees in that area. This proposal is significantly out of character with the surrounding neighborhoods and inappropriate for this area. In addition, this substantial rezoning is completely contrary to the latest Comprehensive Plan adopted by the MDC, which zones our entire neighborhood as “D-S” and classifies it as “environmentally sensitive” due to the surrounding woodlands and wetlands.

In addition to the proposed rezoning and development being completely incongruous with the surrounding neighborhood, the proposed entrance on Knollton road is very problematic, especially because the developers are proposing making this entrance the access to the entire country club. Because the entrance will be right across the road from our house, there will be substantial traffic entering and exiting right across from our driveway on this 2-lane road with no shoulders. After dark, the headlights from vehicles exiting the housing development and the country club will shine right in our front windows. In addition, there is limited sight distance at this point due to a rise in the road to the north. Because of this, and the fact that many people speed down our road, entering

and exiting our driveway is already dangerous. Adding an entrance for the country club and a 43-house development at this same spot will compound this substantially. The plan to move the entrance for the country club is especially frustrating because the entrance has been on Kessler for many decades. We were told by the investors that they want to move the country club entrance to Knollton so they can extend their driving range. If they needed to move the entrance, there is plenty of room for the Kessler entrance to be moved further west to accommodate a longer driving range. The relocation of the country club entrance to Knollton is unnecessary and would be disruptive and dangerous for the residents in our neighborhood.

I am not opposed to the investor group developing their property. However, the property should be developed in a way that is consistent with the surrounding neighborhood in order to maintain the long-established environment in this area: 1-acre lots that preserve as many trees and as much of the existing woodlands as possible. Such a development could actually contribute to the overall character of our neighborhood rather than be detrimental. It is unreasonable for the investors to force high-density housing into this area in order to meet a profit goal. It is also unreasonable to use this development as an opportunity to move the country club entrance to our narrow and dangerous residential road. We should not have to bear this burden so Broadmoor can extend their driving range, especially since they could move the current entrance further west on Knollton to achieve this goal.

We are asking for your help in maintaining this beautiful pocket within Indianapolis and ensuring that development meets the directives of the MDC Comprehensive Plan as well as the desires of the residents within this area.

Sincerely,

Scott Monk  
5425 Knollton Rd.  
713-906-5210

## Blackham, Kathleen

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**From:** Lana Gersich <kelly.lana@icloud.com>  
**Sent:** Monday, December 23, 2024 9:08 AM  
**To:** Lori Miser; Scott Monk; Jason Mackey; Mark Wenzel; Ellen Morley Matthews; Robert Bader; Bill Sando; Richard Starkey  
**Cc:** Greg Zubek; Blackham, Kathleen  
**Subject:** Sewage Issue at BCC  
**Attachments:** PDF.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.

We wanted to let you know about a situation on the Broadmoor Country Club property. Raw sewage has been spilling onto the ground, creating a growing pond, at least since December 18. We contacted Citizen's Energy on December 19, and they came to inspect the area. Citizen's determined that the issue was not on their end but is the problem of the property owner (apparently it is actually the Broadmoor Investment group).

Kelly has photos and video of the situation. She also went to Broadmoor to let them know about the problem. She spoke with Mr. Keith Clark on the 19th. She checked on the area again on the 20th and again went to the clubhouse to report that the issue was ongoing and requested that they get the issue fixed asap. On the 20th, one of the owners/investment group members was present and learned of the situation. On Dec. 21, Kelly again spoke with Keith Clark at the BCC clubhouse.

We have filed a complaint with the Indiana Dept. of Health, Environmental Public Health Division, as well as with the Marion County Public Health Department, a copy of which is attached.

Thought you should all be aware. We'll let you know if we hear anything further.

Let us know if you would like more information on this.

Thanks,  
Lana and Kelly

## Blackham, Kathleen

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**From:** Robert Bader <bader5262@mac.com>  
**Sent:** Wednesday, December 11, 2024 9:47 AM  
**To:** Blackham, Kathleen; Whitaker, Nancy G.  
**Cc:** Toni Bader; Lori Miser; Scott Monk; Ellen Morley Matthews; Lana Gersich; Jason Mackey; Richard Starkey; Mark Wenzel  
**Subject:** Broadmoor Development Rezoning Request

**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.

Kathleen, I wrote to you in August regarding my opposition to the proposed Broadmoor Development variance. I understand that the hearing on the variance has been postponed until January 9, 2025.

Since my initial email, I've become aware of facts that I think seriously affect the proposal.

The proposed plot shows the new primary entrance to Broadmoor Country Club (BCC) on Knollton Road. I understand that the developers have assured neighbors that they will continue to maintain the Kessler Boulevard entrance. I have also been told by another developer that any residential development in the city must have two entrances/exits.

What concerns me is that BCC's management has been telling people that they want to host more large golf events, particularly Professional Golf Association (PGA) events. But they have a significant problem: PGA rules require the host club's driving range be at least 300 yards long. BCC's range is about 30 yards short of that number.

In order to comply with PGA rules, BCC will either have to allow traffic in and out of the Club to run across their new driving range, or move the Club entrance west, which there is ample room for them to do so. There is adequate yardage, about 80 yards between the driving range tees and the Tee Box on the club's 1<sup>st</sup> hole.

I find it incredulous that any golf club would allow commercial traffic to run across any of their active greens or their driving range.

My concern is that the developers have not been truthful about their plans. Neither have they requested or accepted input or been willing to discuss any changes from those of us who will be affected by their development.

If their variance is approved, they will have the ability to do whatever they want with the property.

Again, I am strongly opposed to the proposed variance.



Bob Bader  
bader5262@mac.com  
317/443-4829

**Blackham, Kathleen**

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**From:** Lisa Teague <lteague16@att.net>  
**Sent:** Monday, December 2, 2024 8:48 AM  
**To:** Blackham, Kathleen; Delaney, Brienne  
**Subject:** Rezoning Requests from Broadmoor Investments LLC

I am writing to express my opposition to rezoning requests 2024-ZON-073 and 2024-ZON-073B by Broadmoor Investments LLC (BIL). The development as proposed would be totally out of character of the jewel of the city that is the Knollton / Crooked Creek corridor, not to mention at odds with the current zoning requirements in the surrounding areas.

I have lived in High Knoll Estates for 26 years, and I also currently own 1.6 acres between my house and Knollton that is left in a natural state for the various wildlife that call our corridor home, including the deer and the 26 species of birds that I have identified visiting my yard.

The BIL proposal includes placing the entrance to the new development off of Knollton AND changing the main entrance for Broadmoor from Kessler to Knollton. This makes no sense. Knollton is not set up to handle that type of traffic. The traffic has increased in recent years, and cars already speed on what is a narrow road, putting pedestrians and wildlife alike at risk. The intersection at Knollton and Kessler is already problematic. Waiting to turn left from Kessler onto Knollton leaves one feeling very exposed to being rear-ended, with Kessler necking down at that point and cars behind not knowing whether to go around or wait.

Flooding has occurred in the area; I remember well the flooding on Labor Day 2003 when the entrance to our neighborhood was cut off by flood waters for a time.

It is important to keep natural areas in urban settings for flood mitigation, protection for wildlife, and tree cover for healthy air. Cities need green

spaces for quality of life. The Knollton corridor is such a treasure for what it offers citizens of our city.

Lisa Teague

2220 Galahad Drive

Indianapolis, IN. 46228

## Blackham, Kathleen

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**From:** Mark and Renee Foor <mnrfoor@yahoo.com>  
**Sent:** Sunday, November 10, 2024 6:20 PM  
**To:** Blackham, Kathleen  
**Subject:** Knollton and Kessler Rezoning

I'm opposed to the proposed rezoning and development of 13.69 acres by the Broadmoor County Club, Knollton and Kessler Blvd 46228.

I live in the area and having natural areas is very important to me. Perhaps the city can turn it into a park?

Renee Foor  
(704)618-4940

[Yahoo Mail: Search, Organize, Conquer](#)

## Blackham, Kathleen

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**From:** Ellen Morley Matthews <e2m2@sbcglobal.net>  
**Sent:** Monday, September 23, 2024 2:04 PM  
**To:** Blackham, Kathleen; Whitaker, Nancy G.; Delaney, Brienne  
**Subject:** 2024-ZON-073 & 2024-ZON-073B

Good Afternoon,

We reside at 5505 Knollton Road, Indianapolis, Marion County, Indiana. **We urge the IMDC Hearing Officer to deny approval of the above referenced rezoning petitions at the public hearing scheduled for December 12, 2024.** Following are just some of the reasons why these petitions should be denied.

**Density** We are currently zoned D-5 which requires a minimum lot area of one acre. Broadmoor Investments LLC (BMI) is seeking **D-4 rezoning Case#2024-ZON-073** which has a typical density of 4.2 units per acre and **D-511 rezoning Case#2024-ZON-073B** which provides for the smallest single-family lot size, allowing the most density possible at 5 units per acre, a district that should be “judiciously applied” and described as follows: **The D-511 district is intended for small-lot housing formats, primarily for small, detached houses, but also including a mix of small-scale multi-unit building types. This district can be used for new, walkable suburban neighborhoods or for infill situations in established urban areas, including both low density and medium density residential recommendations of the Comprehensive Plan, and the Suburban Neighborhood or Traditional Neighborhood Typologies of the Land Use Pattern Book.**

**Traffic** BMI’s proposed development would create even more traffic issues/problems than what our neighborhood already has. Knollton Road is a rather narrow two lane road with no shoulders. **BMI’s proposal would route all traffic out onto Knollton Road**, not just traffic in and out of its proposed housing development, but traffic for the Club facility and the golf course as well.

**Drainage** Years ago Broadmoor Country Club (BCC) created what we were told was supposed to be a dry detention pond, not intended to hold water, but instead BCC created a ‘decorative’ pond with a fountain, incorrectly using the pond and pumping water into it which caused flooding in adjacent properties such as ours and our neighbors.

### **Removal of Trees and Woodlands**

BCC’s undeveloped land is all within what the Indianapolis Marion County Comprehensive Plan deems an “environmentally sensitive” area. The construction of 43 homes on such a



small number of acres would require the **destruction of nearly 8 acres of woodlands**, thereby eliminating the habitat of treasured flora and fauna and forever altering one of the oldest existing residential woodlands in the city. After we purchased our property in 1985 we met with a representative from the Department of Natural Resources to learn about old growth forests in our somewhat *exurban* neighborhood. We were advised that our land, as well as undeveloped acres of BCC, represented some of the last remaining urban forests in Washington Township.

**Property Values** Our neighborhood is unique in so many ways. The residential architecture of our neighborhood is decidedly eclectic. Our D-S zoning district clearly follows the statement of purpose which is described as follows: **Sec. 731-202. D-S dwelling suburban district regulations. Statement of purpose. The D-S district is intended for use in areas of extreme topography, areas conducive to estate development, or areas where it is desirable to permit only low density development (such as adjacent to floodplains, aquifers, urban conservation areas, within the extended alignment of airport runways, etc.). Of the dwelling districts providing for only single-family dwellings, the D-S district provides the lowest density in the ordinance. The D-S district provides for single-family residential building lots consisting of at least one acre. A typical density for the D-S district is fourtenths (0.4) units per gross acre. This district represents the very low density residential classification of the comprehensive general land use plan. Development plans should incorporate and promote environmental and aesthetic considerations, working within the constraints and advantages presented by existing site considerations, including vegetation, topography, drainage and wildlife.** BMI's proposed development of 43 houses on only 10+ acres not only ignores the intent of our current D-S zoning, but also would potentially reduce the value of every residential property in our neighborhood regardless of its proximity to BCC. This blatant disrespect of our designation as a D-S Zoning District is unacceptable to say the least.

**Zoning Regulations** BMI's intention to turn BCC's undeveloped property into housing has been in the wind for several years. Although we understand BMI's desire to effectuate a return on its investment, we believe that BMI should respect and abide by the current zoning regulations. To allow such a dramatic shift in the zoning of our neighborhood is patently unreasonable.

In July a concerned neighbors group was formed. The group met with the investors in August at BCC. Since then the group has met regularly in anticipation of the previously scheduled August 29th hearing which was continued to September 26th and now is scheduled for December 12th. We are doing everything that we can to encourage people to send emails to the appropriate people. **We have door knocked and obtained 49 signatures on a petition requesting that the MDC, the Hearing Examiner of the MDC, and MDC Staff deny approval of 2024-ZON-073 and 2024-ZON-073B.** We are working with Indiana Forest Alliance which is helping us generate an electronic petition for a broader audience.

Although we have attempted to convey herein some of the reasons why we are asking the MDC Hearing Officer to deny approval of BMI's rezoning petitions, it is challenging to succinctly state in an email all of the concerns that we and our neighbors have regarding BMI's proposed development.

We appreciate you taking the time to read through this communication.

Ellen Morley Matthews

David C. Matthews

5505 Knollton Road

RE: Rezoning Cases: 2024-ZON-073 and 2024-ZON-073B

My name is Dave Stratman. My wife and I have lived in the subdivision adjacent to Broadmoor Country Club for over 15 years. I highly oppose the rezoning and development plan of the 13.69 acres of the Broadmoor Country Club property currently being proposed by Broadmoor Investments, LLC (BIL). The reasons for my opposition follows.

**This proposal is significantly out of character with the surrounding neighborhoods and inappropriate for this area.** The zoning for the neighborhoods around the proposed development is currently D-S – Dwelling Suburban District, which requires a lot size of 1 acre per single-family home. This creates a very open and low density neighborhood with one of the oldest existing residential woodlands in the city. D-S zoning envisions generous front yards with trees along roadways that follow the natural terrain of the land. The Broadmoor development plan would destroy almost 8 acres of woodland and remove the large majority of trees in that area. The proposed rezoning would also allow these woods to be replaced by high density housing, with the majority of the planned lots being only 1/17th of an acre.

Many of the families living in our neighborhood have lived here for many decades. Most families who chose this neighborhood were drawn here by the large lots with towering trees and, in some areas, blankets of wildflowers and native plants. The proposed development, composed of only lots with less than 5-foot setbacks for the side yards, would be completely out of character from the surrounding neighborhood and would leave no room for the much more natural setting seen with most of the other houses in the area.

In this plan, BIL is not planning on doing anything more than selling the lots to recoup their investment. Once sold, BIL will not be the home builder or developer and if the zoning change is approved, the developer will be able to build whatever they want and sell the homes for whatever they can.

**The proposed Broadmoor development is also all within what the Indianapolis/Marion County Comprehensive Plan deems an “environmentally sensitive” area.** While this does not prevent Broadmoor from removing trees or developing the property as they wish, the removal of these woodlands and development of the property should be given extra scrutiny, especially since the southern part of the property is in a floodplain. The addition of 43 homes in such a small area would require the destruction of nearly 8 acres of woodland, thereby eliminating almost the entire tract of wildlife habitat. Removing 8 acres of trees and replacing them with 43 houses and their associated roads, drives and other non-permeable surfaces will cause increased runoff, add to local flooding problems, and aggravate existing sewer problems already on this property.

**The proposed plan is to make a new entrance onto Knollton Road that will not be just an entrance for the proposed high-density development of 43 new homes, but also the new entrance for the entire Broadmoor Country Club.** In the meeting between the developers and concerned neighbors on August 5th, the BIL members indicated that they planned on closing-off the main entrance to Broadmoor on Kessler Boulevard. This was because the increased amount of traffic on Kessler has made it difficult for members to get in and out of the Club, and to extend the country club’s driving range. That means all traffic into and out of Broadmoor would be routed through this new neighborhood.

**Knollton Road, is a narrow, two-lane secondary road that has no shoulders, no sidewalks for pedestrians, and a significant problem with people speeding.** The topography of Knollton Road is also rolling, and sight distance concerns are common for traffic exiting onto Knollton Road from adjacent driveways. The substantial escalation in traffic from the Broadmoor plan would increase risk to residents along Knollton Road as well as other drivers.

**Traffic entering Kessler Boulevard from Knollton Road is already problematic and challenging** with multiple accidents occurring there. Knollton Road intersects Kessler Boulevard on a reverse curve, meaning there are curves in both directions, which reduces sight distance and renders the intersection more dangerous. The intersection is also adjacent to an Indianapolis Fire Department station and Crooked Creek Elementary School, creating additional conflicts for traffic flow in the area, especially during school opening and closing hours. The cemetery continually repairs its fencing at that intersection, and a guardrail at the fire station needed repair so often, it was removed!

This proposed development would create extremely dangerous driving conditions, substantially degrade an "environmentally sensitive" area, increase local flooding, and have a dramatic, detrimental, and irreversible effect on the character of my neighborhood.

I want to thank you for your attention and reiterate that I am totally opposed to this development.

Sincerely,

Dave Stratman

5325 Olympia Dr.  
Indianapolis, IN 46228  
(317) 374-3776

## Blackham, Kathleen

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**From:** Lana Gersich <kelly.lana@icloud.com>  
**Sent:** Monday, September 16, 2024 4:04 PM  
**To:** Blackham, Kathleen; Delaney, Brienne  
**Cc:** Whitaker, Nancy G.  
**Subject:** OPPOSITION to Rezoning Cases 2024-ZON-073 and 2024-ZON-073B

Dear Ms. Blackham and Councilor Delaney,

**RE: Rezoning cases 2024-ZON-073 and 2024-ZON-073B.**

I am writing to express my **strong** opposition to the rezoning and development plan of the 13.69 acres of the Broadmoor Country Club property currently being proposed by Broadmoor Investments, LLC (BIL).

We purchased our two lots at 5218 and 5220 Knollton Road in 2017 and moved into our forever home in 2019. While looking to move from Zionsville because of rampant building of cookie-cutter houses jammed shoulder-to-shoulder with no concern for frustrating traffic issues, our builder asked, "In a perfect world, what would your new property look like?" After describing our vision, they brought us to this idyllic location. Within 10 minutes of our initial visit to the property, we were met by two does crossing the yard. We immediately agreed to purchase the nearly 3 acres. It is a quiet, cozy, established neighborhood with close proximity to city amenities in an area that we thought was as developed as it would be. We counted on the existence of Washington Park Cemetery, Crooked Creek Elementary School, IFD Station #12, and Broadmoor Country Club to avoid the type of development now being proposed by BIL.

**The reasons for my opposition follow.**

**Environmental:**

In the seven years that we have lived here, we have appreciated the area's rolling topography, sheltering tree canopy, and especially the abundant wildlife including deer, foxes, raccoons, coyotes, opossums, minks, and Indiana brown bats. We delight in the annual arrival of baby wood ducks and mallard babies. We enjoy seeing pileated woodpeckers, hawks, owls, and dozens of other bird species. Destroying the existing woodlands at Broadmoor would irreversibly harm our wildlife sanctuary. It would take years and years for newly planted trees to provide the same benefit.

The proposed Broadmoor development is all within what the Indianapolis/Marion County Comprehensive Plan deems an "environmentally sensitive" area. The southern part of the property is in a floodplain. This seems to ignore the most recent City of Indianapolis Flood Damage Prevention Ordinance adopted in August. The destruction of the woodland area and the construction of associated roads, drives and other non-permeable surfaces will cause increased runoff, add to local flooding problems, and aggravate existing sewer problems already on this property.

We have recently documented a significant amount of runoff coming directly from the retention pond on Broadmoor property flowing onto properties adjacent to and across the street from the golf course, causing washouts to neighboring properties as well as sewage overflow.

This proposal is significantly out of character with the surrounding neighborhoods. The zoning for the neighborhoods around the proposed development is currently D-S – Dwelling Suburban District, which requires a lot size of 1 acre per single-family home. This creates a very open and low density neighborhood with one of the oldest existing residential woodlands in the city. Allowing 43 homes to be crammed on essentially 10 acres of land is completely inappropriate for this area.

In this plan, BIL is only planning to sell the lots to recoup their investment. They clearly have no regard for the people who live in this neighborhood, the abundant wildlife, or the character of this established area. Once sold, BIL will not be the home builder or developer, and if the zoning change is approved, the developer will be able to build whatever they want and sell the homes for whatever they can.

The proposed plan is to make a new entrance onto Knollton Road that will not be just an entrance for the proposed 43 new homes, but also the new entrance for the entire Broadmoor Country Club. Knollton Road is a narrow, two-lane secondary road that has no shoulders, no sidewalks, and a significant problem with people speeding. At least 2-3 times a month I am nearly hit by speeding traffic while trying to mow my lawn. The substantial escalation in traffic from the Broadmoor plan would increase risk to residents along Knollton Road as well as other drivers.

Traffic entering Kessler Boulevard from Knollton Road is already challenging. Knollton Road intersects Kessler Boulevard on a reverse curve, which reduces sight distance and renders the intersection more dangerous. The intersection is adjacent to Indianapolis Fire Dept. Station #12 and Crooked Creek Elementary School, creating additional conflicts for traffic flow in the area. The cemetery continually repairs its fencing at that intersection due to accidents, and a guardrail at the fire station needed repair so often, it was removed! Dumping all Broadmoor traffic onto Knollton will significantly exacerbate traffic issues in this immediate area.

This proposal represents the type of greedy development that we hoped to escape by moving to this beautiful area. It will have a dramatic, detrimental, and irreversible effect on the wildlife, environment and character of our neighborhood and surrounding area.

For these reasons, I reiterate my **strong** opposition to BIL's requested zoning change and development plan, and I respectfully implore you to save our neighborhood!

Sincerely,  
Kelly Franklin

## Blackham, Kathleen

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**From:** Lana Gersich <kelly.lana@icloud.com>  
**Sent:** Monday, September 16, 2024 3:58 PM  
**To:** Blackham, Kathleen; Delaney, Brienne  
**Cc:** Whitaker, Nancy G.  
**Subject:** OPPOSITION to Rezoning Cases: 2024-ZON-073 and 2024-ZON-073B

Dear Ms. Blackham and Councilor Delaney,

RE: Rezoning cases 2024-ZON-073 and 2024-ZON-073B.

I am writing to express my **strong** opposition to the rezoning and development plan of 13.69 acres of the Broadmoor Country Club property currently being proposed by Broadmoor Investments, LLC (BIL).

We may be some of the newer residents of this unique and beautiful neighborhood, having purchased our two lots at 5218 and 5220 Knollton Road and moving into our forever home in 2019, but we plan to live here for many years. While looking to move from Zionsville because of rampant building of cookie-cutter houses jammed shoulder-to-shoulder with no concern for frustrating traffic issues, our builder asked, "In a perfect world, what would your new property look like?" After describing our vision, they brought us to this idyllic location where we purchased nearly 3 acres and built our home. We counted on the existence of Washington Park Cemetery, Crooked Creek Elementary School, IFD Station #12, and Broadmoor Country Club to avoid the type of development now being proposed by BIL.

We were captured by the peacefulness of the area, the rolling topography, sheltering tree canopy, and abundant wildlife including deer, foxes, raccoons, opossums, coyotes, Indiana brown bats, and dozens of species of birds, and we are working to maintain the serenity that drew us here. The destruction of of nearly 8 acres of native woodland on the BCC property would be absolutely devastating.

### **Reasons for my opposition follow.**

The proposed Broadmoor development is all within what the Indianapolis/Marion County Comprehensive Plan deems an "environmentally sensitive" area. The southern part of the property is in a floodplain. This seems to ignore the most recent City of Indianapolis Flood Damage Prevention Ordinance just adopted this August. The addition of 43 homes on 13.69 acres (approx. only 10 of which are buildable) would require the destruction of nearly 8 acres of woodland, thereby eliminating almost the entire tract of wildlife habitat. It would take years and years for newly planted trees to provide the same benefit. Additionally, removal of this woodland area and the construction of associated roads, drives and other non-permeable surfaces will cause increased runoff, add to local flooding problems, and aggravate existing sewer problems already on this property.

This proposal is significantly out of character with the surrounding neighborhoods. The zoning for the neighborhoods around the proposed development is currently D-S – Dwelling Suburban District, which requires a lot size of 1 acre per single-family home. Allowing 43 homes to be crammed on essentially 10 acres of land is outrageous and completely inappropriate for this area.

The proposed plan is to make a new entrance onto Knollton Road that will not be just an entrance for the proposed 43 new homes, but also the new entrance for the entire Broadmoor Country Club. Knollton Road is a narrow, two-lane secondary road that has no shoulders, no sidewalks, and a significant problem with people speeding. The topography of Knollton Road is rolling, causing sight distance concerns for traffic exiting onto Knollton Road from adjacent driveways. The substantial escalation in traffic from the Broadmoor plan would greatly increase risk to residents along Knollton Road as well as other drivers.

Traffic entering Kessler Boulevard from Knollton Road is already challenging. Knollton Road intersects Kessler Boulevard on a reverse curve, reducing sight distance and rendering the intersection more dangerous. The intersection is adjacent to Indianapolis Fire Dept. Station #12 and Crooked Creek Elementary School, creating additional conflicts for traffic flow in the area. The cemetery continually repairs its fencing at that intersection due to accidents, and a guardrail at the fire station needed repair so often, it was removed! Dumping all Broadmoor traffic onto Knollton Road will significantly exacerbate traffic issues in this immediate area.

This proposal represents the type of greedy, ill-conceived development that we hoped to escape by moving to this beautiful area. It will have a dramatic, detrimental, and irreversible effect on the appearance and character of our neighborhood and surrounding area.

For these reasons, I reiterate my staunch opposition to BIL's requested zoning change and development plan, and I implore you to save our neighborhood!

Best regards,  
Lana Gersich



## Blackham, Kathleen

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**From:** Baker, Becca <becca.baker@elevancehealth.com>  
**Sent:** Friday, September 13, 2024 5:49 PM  
**To:** Blackham, Kathleen; Whitaker, Nancy G.; Delaney, Brienne  
**Cc:** kelly.lana@icloud.com; Matthew Simmons  
**Subject:** Strong Opposition to Rezoning Cases 2024-ZON-073 and 2024-ZON-073B

**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.

Hello Ms. Blackham, Ms. Whitaker, and Councilor Delaney,

**I'm writing to express my family's strong opposition and deep concern about the proposed rezoning off Knollton Road (case numbers 2024-ZON-073 and 2024-ZON-073B).**

My name is Becca Baker. My husband and I have lived in High Knoll Estates...since Tuesday of this week. Upon pulling up with our moving truck, you of course understand how shocked we were to learn that the very things that drew us to this beautiful little nook of the world are the very things that may be taken away from our family, our new neighbors, and our broader Washington Township community.

As the newest resident of the community, I'd like to share my immediate concerns regarding the impact of the rezoning and development of high-density housing (some of the only high-density housing in our whole county!) off Knollton Road, as well as the requested relocation of the Broadmoor Country Club entrance to Knollton Road. These concerns are as follows:

- 1. The morals of the whole thing:** In the proposed new "neighborhood", the average proposed lot size is 1/17<sup>th</sup> of an acre. The 3 of you went to Big Ten schools, so I'll assume there are some football fans on this email...picture the 10-yard end zone of a football field. That's about 1/17<sup>th</sup> of an acre. The average anticipated cost of each of these 43 homes is approximately 1 million dollars. The Broadmoor Investments LLC (BMI) developers are not proposing quality living for our community. They are not proposing housing for people who are low income or currently unhoused. They are solely proposing their own financial gain.
- 2. Conservation and environmental impact:** On our second night living here (aka yesterday!), we had the distinct pleasure of attending a neighborhood get-together. If you haven't had the chance to come visit High Knoll Estates, I strongly encourage you to do so. This community is...serene. Idyllic. My husband and I moved from a township nearby where we experienced a lot of noise, no real beauty, and a really scary couple incidents with a neighbor. Among the shaded and quiet backyards, the trees that serve as home to endangered Indiana Bats, and the wildly kind and friendly humans who live here, we have finally found a peaceful home that feels safe and secure. This rezoning would be so uncharacteristic for the surrounding district, disrupt the housing of tens of thousands of animals (deer, racoons, coyotes, opossums, foxes, bats, etc.), and destroy more than 80% of one of the few remaining larger scale natural terrains in our community. If nothing else, the lack of environmental impact analysis is of deep concern to me.
- 3. Financial consequences:** Plain and simple, my husband and I saved up to buy our forever home where we want to raise our someday-family. We decided to spend our money here in Washington Township within Indianapolis limits, instead of the suburbs (where these types of rezoning requests are nearly always quickly and swiftly declined), because of the beautiful masterpiece of land that surrounds us. Other similar young(ish!) couples and families will not follow suit if this land is rezoned. Reddit, Instagram, and TikTok groups focused on central Indianapolis will all show you that our similarly-positioned counterparts want to

invest our money in districts and places that benefit the long-term sustainability of our world and society. Not in the Broadmoor Country Clubs or BMI developers of the world. Not in housing or areas that only beget the extreme “haves” of the world.

4. **Safety due to increased traffic:** Have you ever been on Knollton Road? It is *tiny*. There are virtually no berms on either side of the road. The 56<sup>th</sup>/Knollton and Kessler intersections have some of the highest accident rates in all of midtown Indianapolis. I’m astonished that there hasn’t been a traffic study done or any concern expressed from the BMI developers about the future increase of bodily harm for our neighbors. This really makes it seem like the BMI developers don’t have the best interest of our community in mind.
  
5. **Infrastructure issues:** This neighborhood has preexisting sewer issues and is prone to electrical outages. 43 new homes will surely further burden these systems, increasing the risk of overflows, backups, and additional outages. At this point, I have not heard or found anything indicating proper planning for utilities and emergency access. This compromises the safety and functionality of our infrastructure and will undoubtedly lead to costly repairs, health issues, and a concerning complication for emergency situations.

I implore your team to not allow the destruction of our home, irreparable harm to our community, and irreversible safety and wellbeing implications. Please oppose rezoning cases 2024-ZON-073 and 2024-ZON-073B.

In the meantime, have a great couple of weeks – soak up the last of this beautiful weather!

Best Regards,

Becca Baker



Becca Baker  
Learning Program Manager, Talent Life Cycle  
Indianapolis, IN  
Pronouns: she/her/hers  
Achiever • Relator • Developer • Arranger • Harmony

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### Elevance Health

Becca Baker  
Learning Program Manager, Talent Life Cycle  
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[elevancehealth.com](https://elevancehealth.com)

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## Blackham, Kathleen

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**From:** Starkey, Richard <Richard.Starkey@btlaw.com>  
**Sent:** Friday, September 13, 2024 2:46 PM  
**To:** Blackham, Kathleen; Delaney, Brienne; Whitaker, Nancy G.  
**Cc:** Lana Gersich  
**Subject:** Letter in Opposition to Rezoning at Broadmoor Country Club (2024-ZON-073 and 2024-ZON-073B)  
**Attachments:** LETTER IN OPPOSITION TO REZONING.pdf

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Hi Everyone,

I have attached a letter in opposition to Petitioner Broadmoor Investments LLC for rezoning pursuant to Case No. 2024-ZON-073 and 2024-ZON-073B. This letter is written in my capacity as a resident of High Knoll Estates (adjacent to Broadmoor Country Club), and not in any role as an attorney.

Thank you for your consideration.

Richard

**Richard Starkey** | Partner

Barnes & Thornburg LLP

11 South Meridian Street, Indianapolis, IN 46204

Direct: (317) 231-7510 | Mobile: (317) 697-4217



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To: Kathleen Blackham, Senior Planner, City of Indianapolis;  
Nancy Whitaker, Hearing Specialist, Dept. of Metropolitan Development; and  
Councilor Brienne Delaney

Copied: Lana Gersich

From: Richard Starkey

Subject: My Opposition to Rezoning 2024-ZON-073 and 2024-ZON-073B

Hi All,

This letter is to express my opposition to the rezoning proposal of Petitioner Broadmoor Investments LLC (BMI) (Case numbers 2024-ZON-073 and 2024-ZON-073B). I have lived in the neighborhood (High Knoll Estates) adjacent to Broadmoor Country Club (the Club) for almost 30 years, and love the dense forest that I can enjoy so close to downtown (we have two acres of old growth forest behind our house abutting Crooked Creek). With this proposed rezoning, much of the forest adjacent to the Club will be clear cut, depriving all (including the variety of wildlife...deer, foxes, muskrats, and birds) of the natural surroundings we so enjoy.

BMI is proposing a rezoning that would allow a high-density project, squeezing 43 homes onto less than 13 acres (and less than 10 acres of developable land). Not only does this rezoning fly in the face of the surrounding zoning regulations, but contradicts the latest Comprehensive Plan adopted by the MDC that was carefully reviewed and years in the making.

Presently, our neighborhood is zoned D-S Dwelling Suburban, and rightfully so. Such zoning is intended for areas of extreme topography, where it is desirable to permit only low-density development providing for only single-family residential building lots consisting of at least one acre. According to the Zoning regulations, D-S development plans should incorporate and promote environmental and aesthetic considerations presented by existing site considerations including vegetation, topography, drainage and wildlife. **This will not be the case if BMI's rezoning occurs.**

I would strongly encourage a denial of the rezoning request of BMI. Such zoning is not in line with existing zoning regulations, and will decimate the beauty that we all have come to love.

Very truly yours,



Richard Starkey

## Blackham, Kathleen

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**From:** lsmithjso@gmail.com  
**Sent:** Sunday, September 15, 2024 10:28 PM  
**To:** Blackham, Kathleen; Delaney, Brienne; dmdpublic.Comments@indy.gov; Whitaker, Nancy G.  
**Cc:** kelly.lana@icloud.com  
**Subject:** Rezoning cases: 2024-ZON-073 and 2024-ZON-073B, Knollton Road

September 15, 2024

To:

- Kathleen Blackham, Senior Planner, City of Indianapolis, [kathleen.blackham@indy.gov](mailto:kathleen.blackham@indy.gov);
- Nancy Whitaker, Hearing Specialist, Dept. of Metropolitan Development, Petition Submittals: <https://www.indy.gov/form/land-use-petition-submission>
- Councilor Brienne Delaney, [brienne.delaney2@indy.gov](mailto:brienne.delaney2@indy.gov)

From: Larry & Jana Smith,  
Address: 5111 Knollton Road  
Email: [lsmithjso@gmail.com](mailto:lsmithjso@gmail.com)  
Phone: 317-649-2754

Regarding: Rezoning cases: 2024-ZON-073 and 2024-ZON-073B

We are writing to express our strong opposition to the proposed zoning changes to facilitate the development of 13 acres of Broadmoor Golf Course along Knollton road.

The zoning for the neighborhoods around the proposed development is currently D-S – Dwelling Suburban District, which requires a lot size of 1 acre per single-family home. This creates a very open and low-density neighborhood. The proposed rezoning would allow high density housing, with most of the planned lots being only 1/17th of an acre. This is totally out of character for the surrounding homes along Knollton road and would have a negative impact on the values of these properties. If it is to be developed it should be kept with the current zoning of the surrounding properties.

Further, the developers plan to combine the entrance of the proposed development with that of the golf course. With 43 new homes and all the golf course traffic there would be a substantial burden placed on Knollton road. The additional traffic would make it more hazardous for walking and bike traffic as well. The members of Broadmoor may still have to deal with turning onto Kessler depending on the direction traveling and having this as the only entrance would add time to their trip in addition to backing up traffic on Knollton road.

Sincerely,  
Larry & Jana Smith

## Blackham, Kathleen

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**From:** Thomas Kryder-Reid <tomkryderreid@gmail.com>  
**Sent:** Sunday, September 15, 2024 7:48 PM  
**To:** Blackham, Kathleen  
**Subject:** Opposition to proposed Broadmoor rezoning

RE: Rezoning case numbers 2024-ZON-073 and 2024-ZON-073B

Dear Ms. Blackham—

I write to register my opposition to the proposed rezoning of the Broadmoor Country Club property by Broadmoor Investments, LLC (BMI). My family and I have lived in the adjoining High Knoll neighborhood (on the northeastern edge of the golf course) since 2003, and as a runner as well as a resident, I know the area intimately. What's clear to me is that the density of BMI's proposed development is way out of proportion to the capacity of this little patch of the city to support it. Here are my specific concerns:

**Traffic safety:** Existing hazards include speeding along narrow two-lane Knollton Road, an already dangerous intersection of Knollton with Kessler Boulevard, and twice-per-day congestion created by pick-up and drop-off at Crooked Creek Elementary School. Adding an intersection from the proposed development directly onto Knollton, just to the south of the Kessler junction, would only compound these complications. Besides, Knollton itself is simply not wide enough to absorb the traffic entering and exiting a forty-three-unit development.

**Flood control:** Crooked Creek runs through this area and, thanks to surrounding woodlands, overflows only when major storms hit. The proposed development would wipe away much of this protective barrier, and the flood risk would rise. Would the city not prefer retaining these natural flood protections to spending untold sums on stopgap artificial measures after real damage occurs?

**Environmental integrity:** Our local ecosystem is vibrant, blessed with a variety of mammals, birds, and flora, as well as an embracing tree canopy that helps shield us in times of extreme heat. I cringe at the deleterious effects that would be set in motion by the proposed project and its attendant clearcutting, paving, and cheek-to-jowl construction.

For all these reasons, I join other neighbors in opposing the proposed development plan of 13.69 acres of Broadmoor Country Club's property for high density housing and the requested zoning change from SU-34 to D5-II and D4 zoning.

Sincerely,

Thomas Kryder-Reid

## Blackham, Kathleen

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**From:** Daniel Incandela <d8niel@gmail.com>  
**Sent:** Friday, September 13, 2024 6:28 PM  
**To:** Blackham, Kathleen; Delaney, Brienne  
**Cc:** Leslie Bailey  
**Subject:** Broadmoor Country Club property currently proposed by Broadmoor Investments, LLC (BIL)

Dear City of Indianapolis Team,

I hope this email finds you well. I am writing to formally express my **strong opposition** to the rezoning plan proposed by Broadmoor Investments, LLC (BIL) for the Broadmoor Country Club property.

My primary concerns are as follows:

### **Development Plan:**

BIL's plan to sell 43 plots for \$200,000 each without further involvement raises concerns about long-term oversight. Additionally, the rerouting of traffic through our neighborhood will increase congestion. The development's gated entrances lack sufficient turnaround space for emergency vehicles, posing a significant safety issue.

### **Neighborhood Impact:**

The proposed plan would result in the destruction of 80% of the old-growth trees, which will increase flooding risks and displace wildlife. This would also have a negative impact on property values in the area. The high-density housing proposed is out of character with the neighborhood, where recent home sales averaged \$530,000 on 1-acre lots.

### **Infrastructure Impact:**

The increased traffic will put additional strain on our roads, leading to higher maintenance costs. Our already problematic sewer system will face further stress, increasing the likelihood of overflows and backups. The lack of proper planning for utilities and emergency access further jeopardizes the safety and functionality of the infrastructure.

### **Wildlife Impact:**

The removal of old-growth trees will destroy habitats for local wildlife, including deer, raccoons, coyotes, opossums, and foxes, forcing them to relocate and increasing encounters in residential areas. This habitat loss will also negatively affect bird populations and other species that rely on the trees for shelter and food.

In summary, I do not support the proposed rezoning and development plan for the 13.69 acres of Broadmoor Country Club property. I also oppose the change in zoning from SU-34 to D5-II and D4, as this proposal is inconsistent with the character of the surrounding neighborhoods and is not appropriate for the area.

Thank you for your time and consideration.

Sincerely,

Daniel and Leslie Incandela



5210 Olympia Drive  
Indianapolis, IN 46228  
317.616.8918

## Blackham, Kathleen

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**From:** Liz Kryder-Reid <lizkryderreid@yahoo.com>  
**Sent:** Sunday, September 15, 2024 12:27 PM  
**To:** Blackham, Kathleen  
**Subject:** opposition to rezoning plan for Broadmoor Country Club property

Dear Ms. Blackham,

I am writing to register my opposition to the proposed rezoning of Broadmoor Country Club property by Broadmoor Investments, LLC (BIL). I believe the density of the proposed development would have a detrimental effect on the neighborhood, particularly regarding flooding, traffic, and environmental impacts.

My husband and I have lived in the neighborhood for more than 20 years, raising our 3 daughters here. The proposed development is ill-suited to this area for a number of reasons.

**Traffic:** I am particularly concerned about the traffic impacts. The proposed number of housing units would exacerbate the existing issues with speeding along the 2-lane Knollton Road and the dangerous intersections with Knollton Road and Kessler Blvd. With the Crooked Creek Elementary School opposite that intersection, drop off and pick up times already cause a major congestion problem that exceeds the capacity of the existing traffic levels. Adding an intersection along that stretch of Knollton would create major problems, either with back ups at the Knollton-Kessler intersection if there is a traffic light, or with a dangerous intersection if not.

**Flooding:** We have experienced overflow of Crooked Creek, which runs through the neighborhood, a couple of times over the past two decades. The proposed development would exacerbate the risk of flooding by destroying the natural protective barriers that the current woodland affords. My understanding is that the city wants to minimize future public expenditures for flood control projects. It would be far more efficient to retain the existing woodland that slows runoff and encourages absorption than to undertake a massive flood control project along the creek.

**Environment:** This area has a rich and vital ecosystem of old growth trees, coyote, deer, fox, hawks and other birds of prey, The tree canopy in the area creates natural defenses against extreme heat. These natural resources provide health benefits for the broader community, and the demolition of the woodlands with clearcutting for a dense housing development would be a loss both for the diverse habitat and for the surrounding residential community.

For these reasons, I oppose the proposed development plan of 13.69 acres of Broadmoor Country Club's property for high density housing and the requested zoning change from SU-34 to D5-II and D4 zoning.

Sincerely,

Elizabeth Kryder-Reid

## Blackham, Kathleen

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**From:** J C <june3rainey@gmail.com>  
**Sent:** Saturday, September 14, 2024 7:07 PM  
**To:** Delaney, Brienne; Blackham, Kathleen  
**Cc:** kelly.lana@icloud.com  
**Subject:** Rezoning case numbers: 2024-ZON-073 and 2024-ZON-073B

To: Kathleen Blackham, Senior Planner, City of Indianapolis Nancy Whitaker, Hearing Specialist, Dept. of Metropolitan Development; and Councilor Brienne Delaney

cc: Lana Gersich

From: June Cargile

Subject: Rezoning case numbers: 2024-ZON-073 and 2024-ZON-073B

Date: September 14, 2024

Dear Ms. Blackham, Ms. Whitaker and Councilor Delaney:

My name is June Cargile and I am writing with regard to the above mentioned case numbers. For more than thirty years, I have lived in High Knoll Estates with my daughter. I chose to live in this area because of its beauty and quiet elegance, the safety it afforded, the proximity of wildlife and massive trees, the neighbors who meticulously maintain their properties and who are appreciative of each other and the likelihood that I could one day leave my daughter a home that would retain and hopefully increase in value. I also valued the relative ease of my commute to my positions downtown where I worked for the State, and later at Indiana University Bloomington, where I served for 13 years until I retired.

I write to say that I am completely opposed to the rezoning proposals submitted by Broadmoor Investment LLC. (BIL), case numbers:  
2024-ZON-073 and 2024-ZON-073B.

The proposal ignores the current zoning status which is D-S-Dwelling Suburban District which requires a lot size of 1 acre single-family homes. The proposed zoning would allow lots the size of 1/17 of an acre! The main thoroughfare for this neighborhood is Knollton Road, which is only two lanes with no shoulders. With the volume of homes that are proposed for this small area, not only will traffic problems become dangerous, but I foresee serious problems for the Crooked Creek Fire Station trying to navigate all the proposed gates in the area, and lack of turn around spaces, and the narrow two lane road if trying to respond to calls for help. It will be disastrous.

The proposal disregards the character of the neighborhood where so many families have invested and planned to raise their families and live in peace. The neighborhood will be gone. 8 acres of irreplaceable trees will be gone. The habitat for so many forms of wildlife will be gone. (I counted 25 deer crossing my backyard heading to the woods adjacent to Broadmoor Country Club.) It seems so unfair to the families who worked and saved and sacrificed to move to this area to be pushed out because those with money want to make even more money.

Finally, I have concerns regarding the drainage problems all these additional houses would place on the infrastructure of the present neighborhood. My house was flooded many years ago, and suffice it to say, many thousands of dollars were spent to repair the damage.

If you ever feel like taking a drive, please drive down Knollton Road between Kessler Boulevard and 51st Street, and then turn into High Knoll Estates. You will see why so many are trying so hard to protect their homes and the neighborhood.

Thank you for your time and attention.

Most sincerely,

June Cargile and Lori James (Daughter)

## Blackham, Kathleen

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**From:** Kathleen Wenzel <wenzelnk@yahoo.com>  
**Sent:** Saturday, September 14, 2024 2:28 PM  
**To:** Blackham, Kathleen; Whitaker, Nancy G.; Delaney, Brienne  
**Cc:** kelly.lana@icloud.com  
**Subject:** Rezoning Case Nos: 2024-ZON-073 and 2024-ZON-073B

To: Kathleen Blackham, Senior Planner, City of Indianapolis  
Nancy Whitaker, Hearing Specialist, Dept. of Metropolitan Development, Petition Submittals  
Brienne Delaney, Counsilor

Cc: Lana Gersich

From: Mark & Kathleen Wenzel, High Knoll Estates

Re: Rezoning Case Nos: 2024-ZON-073 and 2024-ZON-073B

Dear Ms Blackham, Ms Whitaker, and Counsilor Delaney,

We are writing you today to voice our **opposition to the Broadmoor Investments, LLC (BMI) request for re-zoning of the two tracts of land abutting our neighborhood contained in Case Nos. 2024-ZON-073 and 2024-ZON-073B.** The proposals presented by BMI are incompatible with the nature of our existing community and provide no benefit to the surrounding area.

We moved to High Knoll Estates, a small community just off Knollton Road, in March 1994 with our two young daughters. Kathleen had lived in Indianapolis since 1973 in the Butler University/Meridian Kessler area since 1973, but had never known this little area of heavenly country existed in Indianapolis. As soon as we turned off Kessler Blvd onto Knollton, we were charmed by the quiet, country feel with the canopy of mature trees, the wildflowers that were peeking out along the edges. We have constantly thrilled at the quietness and serenity we have enjoyed in our little enclave among the mature trees these 30+ years. We were sad when Broadmoor cut down a number of trees to the south of the driving range a number of years ago, clearing out the wild forget-me-knots and day lilies, but the green underbrush returned.

We, and our girls, have enjoyed the wildlife that appears among our woods and in our yards: raccoons, possums, and deer. We have had as many as 9-11 deer of all ages quietly eating grass in our yard in the early mornings. We have heard coyotes in the late evening and have heard of foxes appearing in the early mornings. We appreciate that the possums help keep the mosquito population down. We have woodpeckers and a vast variety of other birds that frequent our neighborhood and live in the surrounding woods. Our neighbors have commented on the bats they observe in the woods and around their property immediately abutting the woods.

The destruction of the better part of 8 acres of woods, as required by the development plan envisioned by BMI, would ruin most of that environment and natural habitat. That would be unconscionable.

Our primary objections to the BMI re-zoning proposals are:

1) **Preservation of the natural habitat and wildlife of this area:** It would require the destruction of the natural habitat of so much wildlife and the destruction of the better part of 8 acres of a mature tree canopy, something that is needed and beneficial to us all. The tree canopy helps cool our neighborhood, cleans the air of carbon dioxide, provides stabilization of the soil to prevent undue flooding, helps maintain the water table, and provides a wonderful sense of relaxation and tranquility in an otherwise hectic, urban environment. It would take years and years for newly planted trees to provide the same benefit.

2). **Traffic Congestion and Safety:** The BMI plan is to re-route the golf club's member traffic from Kessler Blvd to Knollton. The proposed entrance onto Knollton is only a short distance south of Knollton's intersection with Kessler Blvd. This is the same entrance to Knollton that BMI plans for all 43 new residences to use as well.

We already experience difficulties accessing Kessler Blvd from Knollton, and depending on the time of day, it can be quite difficult. The stoplight at Michigan Rd and Kessler is only a block east of the intersection with Knollton. Knollton to Kessler is governed by a stop sign. There are many, many times of the day when traffic on Kessler is backed up between the stoplight at Michigan Road and the stoplight at Cooper Road/South Kessler. We must wait for some kind soul to hold up traffic to let a car turning east onto Kessler from Knollton on. That can sometimes take quite a while. On school mornings and afternoons, there is the added traffic congestion caused by the school busses turning in/out and car drop-off/pick-ups for Crooked Creek Elementary School.

There is a 'dog-leg' that runs behind the fire station that connects Knollton to Kessler for travelers going west onto Kessler. However, those not familiar with the area don't use that route. Many cars advance to the Knollton-Kessler stop sign closest to Crooked Creek School and try to turn left. That can really hold up traffic on Knollton as getting across two lanes of Kessler is very difficult given the timing of the Michigan Road stoplight and the Cooper/S. Kessler stoplight.

Adding more club members unfamiliar with the traffic patterns and residents and visitors to the planned 43 homes in that small area will really cause traffic congestion and stalled traffic patterns trying to access or exit Knollton Road. A traffic light at that intersection to replace the stop sign would do little to help, given the Michigan Road light is such a short distance away. It would just jam up that intersection.

The intersection from Kessler onto Knollton Road is already a tricky one. Because of the nature of the curves there and the tree line, people turning off of Kessler often 'cut' that corner and turn into the northbound lane of Knollton unaware that a car is waiting at the stop sign on Knollton. Many times I have come close to being clipped while waiting to turn right onto Kessler from Knollton. Northbound cars on Knollton need to pull up to the proper place to turn while waiting at the stop sign to be able to see, but also have to be aware that many drivers cut that turn off of Kessler and encroach on the northbound lane. This is an area primed for collisions and they do occur.

**3. Pedestrian Safety:** Knollton Road is a two-lane road with no shoulders, much less sidewalks. In the 30+ years we have lived in High Knoll Estates, the traffic along Knollton has not only increased in amount, but in speed. Originally, we could walk down Knollton towards 44th Street without fearing for our lives. I gave that up years ago because I felt unsafe with the increased traffic and the increased speed the vehicles were going.

Adding more density of housing at the level BMI is proposing cannot possibly help with decreasing the traffic volume or help with increasing the safety factor for pedestrians that would like to enjoy walking among the neighborhoods bordering Knollton.

**4. Inappropriate level of proposed Density:** The density of development as proposed by BMI is inconsistent with the overall nature and expectations of our community. It will not fit in and will be a stark contrast without providing any redeeming qualities to the surrounding community.

Currently, the houses in this area enjoy large yards/spaces. The houses are unique and not "cookie-cutter" or stylized repeats. BMI apparently only wishes to maximize profits by dividing up 13.69 acres into 43 separate lots of approximately 0.058 acre/lot. The land is currently zoned for 1-single-family house/1-acre. That proposed level of increased density is unconscionable given the surrounding area, the destruction of 8 acres of mature woods, the fact that portions of the land is within a flood plain, and the impact on traffic patterns, wildlife, and pedestrians. BMI is not concerned with the impact of their proposal on the land, the neighborhood, the area, or the natural habitat that currently exists.

Once BMI sells the lots it proposes, it will retain no further control or concern over the actual development of the land or the impact thereof. In short, BMI is a bad neighbor and had hoped to get all of this done without giving notice to any High Knoll Estates homeowners, despite two of BMI owners being High Knoll Estates homeowners.

For all these reasons, we, as neighbors to this land, hereby **OPPOSE BMI's request to re-zone the parcels of land at issue in Case Nos 2024-ZON-073 and 2024-ZON-073B.**

Thank you for your consideration,

Mark & Kathleen Wenzel  
2309 Galahad Drive  
Indianapolis, In 46228

## **Blackham, Kathleen**

---

**From:** Phillip Tennant <ptennant@philliptennant.com>  
**Sent:** Saturday, September 14, 2024 1:12 PM  
**To:** Blackham, Kathleen  
**Subject:** Rezoning

Hello,

My name is PhillipTennant, I have lived at 5116 Knollton Road for over 40 years. I am a professor Emeritus Herron School of Art a Design and my wife is a sculptor. We moved to our Knollton road home to build a studio and a life. This neighborhood is special and needs to not be touched by developers or anyone who will destroy the unique and life enriching environment that has provided my family and our neighbors a special place to live in Indianapolis.

I am writing this letter in opposition to the rezoning and development plan of cases: 2024-ZON-073 AND 2024-ZON-073B/ of 13.69 acres of the Broadmoor Country Club property currently proposed by Broadmoor Investments, LLC (BIL). These are some of my reasons for my strong opposition to this rezoning and devastating plan:

### **Removal of Trees and Woodlands**

The proposed Broadmoor development is all within what the Indianapolis – Marion County Comprehensive Plan deems an “environmentally sensitive” area. The addition of 43 homes in such a small area would require the destruction of nearly 8 acres of woodland, thereby eliminating habitat for much-loved wildlife, and forever alter one of the oldest existing residential woodlands in the city. The trees help shade the neighborhood, keeping it cooler in the summer and help control ground water and is a refuge for many animals and birds to live. I have seen owls, bats, foxes, raccoons, deer and some many others that make this place unique.

### **Density**

The investment group’s intention is to change the current zoning of 13.69 acres from its current SU-34 zoning. My neighborhood is zoned for one house per acre. The residential property south and east of the 13.69 acres a) is zoned DS, Dwelling Suburban, which requires a lot size of 1 acre per single-family home, and b) has been developed with lots of at least one acre, several of which are substantially larger than one acre. The proposed rezoning would be for 43 residential lots with 15 lots having an area as small as .115 acres and 28 lots having an area as small as .058 acres---dramatically different than the one acre plus lots bordering the 13.69 acres. The Indianapolis Comprehensive Plan has a recommendation for Regional Special Use for this property and does not recommend anything close to the high-density residential use being sought.

### **Traffic**

Additionally, I oppose this plan proposed by BIL to close the current entrance onto Kessler Boulevard and make a new entrance onto Knollton Road because this will be not just an entrance for the proposed high-density development of 43 new homes, but also the new entrance for the entire Broadmoor Country Club. This would impose additional traffic in an area that includes a busy fire station as well as an elementary school on a narrow side road with no shoulders. I

walk on Knollton Road most every day. It is a dangerous road to walk because cars use it as a secondary thoroughfare from North Michigan Road to get to 38th street. If you add more homes, it will add to more traffic. If you put the entrance onto Knollton road you will increase the chance of accidents. Please do not rezone my neighborhood. Thank you for your time.

Sincerely Yours,  
Phillip Tennant  
5116 Knollton Road, Indianapolis, IN 46228

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## **Blackham, Kathleen**

---

**From:** Susan Tennant <susan@susantennant.com>  
**Sent:** Saturday, September 14, 2024 12:34 PM  
**To:** Blackham, Kathleen  
**Cc:** Kelly Franklin  
**Subject:** Opposition to rezoning case numbers: 2024-ZON-073 AND 2024-ZON-073B

Hello,

My name is Susan Tennant, I have lived at 5116 Knollton Road for over 40 years. I am an artist, and my husband is a furniture designer. We moved to our Knollton road home to build a studio and a life. This neighborhood is special and needs to not be touched by developers or anyone who will destroy the unique and life enriching environment that has provided my family and our neighbors a special place to live in Indianapolis.

I am writing this letter in opposition to the rezoning and development plan of cases: 2024-ZON-073 AND 2024-ZON-073B/ of 13.69 acres of the Broadmoor Country Club property currently proposed by Broadmoor Investments, LLC (BIL). These are some of my reasons for my strong opposition to this rezoning and devastating plan:

### **Removal of Trees and Woodlands**

The proposed Broadmoor development is all within what the Indianapolis – Marion County Comprehensive Plan deems an “environmentally sensitive” area. The addition of 43 homes in such a small area would require the destruction of nearly 8 acres of woodland, thereby eliminating habitat for much-loved wildlife, and forever alter one of the oldest existing residential woodlands in the city. The trees help shade the neighborhood, keeping it cooler in the summer and help control ground water and is a refuge for many animals and birds to live. I have seen owls, bats, foxes, raccoons, deer and some many others that make this place unique.

### **Density**

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### **Traffic**

Additionally, I oppose this plan proposed by BIL to close the current entrance onto Kessler Boulevard and make a new entrance onto Knollton Road because this will be not just an entrance for the proposed high-density development of 43 new homes, but also the new entrance for the entire Broadmoor Country Club. This would impose additional traffic in an area that includes a busy fire station as well as an elementary school on a narrow side road with no shoulders. I walk on Knollton Road most every day. It is a dangerous road to walk because cars use it as a secondary thoroughfare from North Michigan Road to get to 38th street. If you add more homes, it will add to

more traffic. If you put the entrance onto Knollton road you will increase the chance of accidents. Please do not rezone my neighborhood. Thank you for your time.

Sincerely Yours,  
Susan Tennant  
5116 Knollton Road, Indianapolis, IN 46228

[susantennant.com](http://susantennant.com)

Diana J. Ensign, JD  
5325 Olympia Dr.  
Indianapolis, IN 46228  
[dianajensign@gmail.com](mailto:dianajensign@gmail.com)

September 13, 2024

**Sent via email** to: Kathleen Blackham, Senior Planner, City of Indianapolis; Nancy Whitaker, Hearing Specialist, Dept. of Metropolitan Development; and Councilor Brienne Delaney

**Subject: Opposition to rezoning case numbers: 2024-ZON-073 and 2024-ZON-073B**

Dear Ms. Blackham, Ms. Whitaker, and Councilor Delaney,

My name is Diana Ensign. My husband and I reside in the subdivision adjacent to Broadmoor Country Club. I highly oppose the rezoning and development plan of the 13.69 acres of the Broadmoor Country Club property currently being proposed by Broadmoor Investments, LLC. The reasons for my opposition are as follows:

- **Risk to Health and Safety from Flooding**

The proposed Broadmoor development is within what the Indianapolis/Marion County Comprehensive Plan deems an “environmentally sensitive” area. In fact, this area is prone to flooding as there are already issues with standing water in our neighborhood streets during rains, and we are in or near floodplains. The Broadmoor development plan would destroy almost 8 acres of woodland and remove the large majority of trees in that area. The proposed rezoning would also allow these woods to be replaced by high density housing, with the majority of the planned lots being only 1/17<sup>th</sup> of an acre. Urban tree canopies with deep roots help to absorb rainwater and prevent flooding. The impact of this proposed development would eliminate the natural, beneficial flood barriers that are provided by these trees. As such, the proposed development is dangerous to the health and safety of the people who live here and also poses property hazards to our neighborhood. The proposal puts all of us at risk for dangerous increased flooding.

- **Threaten the Character of the Neighborhood and Inappropriate for this Area**

The zoning for the neighborhoods around the proposed development is currently D-S – Dwelling Suburban District, which requires a lot size of 1 acre per single-family home. This creates a very open and low-density neighborhood with one of the oldest existing residential woodlands in the city. D-S zoning envisions generous front yards with trees along roadways that follow the natural terrain of the land. Most families who chose this neighborhood were drawn here by the large towering trees. The proposed development, composed of only lots with less than 5-foot setbacks for the side yards, would be completely out of character from the surrounding neighborhood and would leave no room for the much more natural setting seen with most of the other houses in the area.

- **Traffic Accidents and Risk to Students**

Traffic issues at Kessler Boulevard and Knollton Road are already problematic with multiple accidents occurring there. Our daughter was rear-ended while trying to enter Knollton Road from Kessler Boulevard, and I have seen students walking along Knollton from the nearby Crooked Creek Elementary school (there are no sidewalks or shoulders), and I am worried for their safety. This proposed development with 43 new homes and all of the golf course traffic (including service vehicles, deliveries, etc.) would create extremely dangerous driving conditions and add to this risk of accidents and potential harm to students (and other pedestrians) who walk along Knollton.

For the above reasons, my husband and I are strongly opposed to the rezoning and development proposal as put forth in case numbers: 2024-ZON-073 and 2024-ZON-073B.

Sincerely,

Diana J. Ensign, JD  
dianajensign@gmail.com

## **Blackham, Kathleen**

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**From:** Peter Hansen <peter.a.hansen@sbcglobal.net>  
**Sent:** Friday, September 13, 2024 2:25 PM  
**To:** Blackham, Kathleen; Delaney, Brienne; Whitaker, Nancy G.  
**Cc:** Lana Gersich  
**Subject:** Rezoning cases 2024-ZON-073 & 2024-ZON-073B

I am writing in opposition to the rezoning request by Broadmoor Investments LLC (BIL) for significant development and upheaval on the Broadmoor Country Club and Golf Course property. These are rezoning cases 2024-ZON-073 and 2024-ZON-073B.

When my wife and I decided to move to High Knoll Estates 21 years ago, we were immediately drawn to the forest and woodland nature of the area. High Knoll Estates borders the golf course on the west and Knollton Road on the east. While we did not know at the time, this area is zoned D-S Dwelling Suburban, which is intended for areas of extreme topography, where it is desirable to permit only low density development (one house per acre) that incorporates and promotes environmental and aesthetic considerations including vegetation, topography, drainage and wildlife.

Rezoning to meet the development needs planned by BIL would remove a large number of old growth trees on an environmentally sensitive 8 acre area and exacerbate already existing drainage problems in the area. It would have a extremely negative impact on the above stated considerations for D-S zoning.

The number of homes they are proposing that would be built seems impractical (many on 1/17 of an acre) and would lead to a massive and dangerous increase in traffic on Knollton Road, which is a narrow 2 lane road with no sidewalks.

With climate change being top of mind it seems ludicrous to cut down a large number of old growth trees in an environmentally sensitive area in the interest of paving over a large swath of land for this project, which will increase traffic, exacerbate drainage and flooding issues not to mention marring the exquisite character of a neighborhood that many here consider a jewel of Indianapolis.

It is my understanding that no where in Marion County does this type of zoning that BIL are requesting exist. I hope you will do the only reasonable thing and reject this rezoning request.

Thank you for your time.

Peter Hansen  
5235 Roland Drive  
Indianapolis, IN 46228  
317 727 1376

Hello,

My name is Susan Tennant, I have lived at 5116 Knollton Road for over 40 years. I am an artist, and my husband is a furniture designer. We moved to our Knollton road home to build a studio and a life. This neighborhood is special and needs to not be touched by developers or anyone who will destroy the unique and life enriching environment that has provided my family and our neighbors a special place to live in Indianapolis.

I am writing this letter in opposition to the rezoning and development plan of cases: 2024-ZON-073 AND 2024-ZON-073B/ of 13.69 acres of the Broadmoor Country Club property currently proposed by Broadmoor Investments, LLC (BIL). These are some of my reasons for my strong opposition to this rezoning and devastating plan:

### **Removal of Trees and Woodlands**

The proposed Broadmoor development is all within what the Indianapolis – Marion County Comprehensive Plan deems an “environmentally sensitive” area. The addition of 43 homes in such a small area would require the destruction of nearly 8 acres of woodland, thereby eliminating habitat for much-loved wildlife, and forever alter one of the oldest existing residential woodlands in the city. The trees help shade the neighborhood, keeping it cooler in the summer and help control ground water and is a refuge for many animals and birds to live. I have seen owls, bats, foxes, raccoons, deer and some many others that make this place unique.

### **Density**

The investment group’s intention is to change the current zoning of 13.69 acres from its current SU-34 zoning. My neighborhood is zoned for one house per acre. The residential property south and east of the 13.69 acres a) is zoned DS, Dwelling Suburban, which requires a lot size of 1 acre per single-family home, and b) has been developed with lots of at least one acre, several of which are substantially larger than one acre. The proposed rezoning would be for 43 residential lots with 15 lots having an area as small as .115 acres and 28 lots having an area as small as .058 acres---dramatically different than the one acre plus lots bordering the 13.69 acres. The Indianapolis Comprehensive Plan has a recommendation for Regional Special Use for this property and does not recommend anything close to the high-density residential use being sought.

### **Traffic**

Additionally, I oppose this plan proposed by BIL to close the current entrance onto Kessler Boulevard and make a new entrance onto Knollton Road because this will be not just an entrance for the proposed high-density development of 43 new homes, but also the new entrance for the entire Broadmoor Country Club. This would impose additional traffic in an area that includes a busy fire station as well as an elementary school on a narrow side road with no shoulders. I walk on Knollton Road most every day. It is a dangerous road to walk because cars use it as a secondary thoroughfare from North Michigan Road to get to 38<sup>th</sup> street. If you add more homes, it will add to more traffic. If you put the entrance onto Knollton road you will increase the chance of accidents. Please do not rezone my neighborhood. Thank you for your time.

Sincerely Yours,

Susan Tennant

5116 Knollton Road, Indianapolis, IN 46228



RE: Rezoning case numbers 2024-ZON-073 and 2024-ZON-073B

To whom it may concern—

I write to register my opposition to the proposed rezoning of the Broadmoor Country Club property by Broadmoor Investments, LLC (BMI). My family and I have lived in the adjoining High Knoll neighborhood (on the northeastern edge of the golf course) since 2003, and as a runner as well as a resident, I know the area intimately. What's clear to me is that the density of BMI's proposed development is way out of proportion to the capacity of this little patch of the city to support it. Here are my specific concerns:

**Traffic safety:** Existing hazards include speeding along narrow two-lane Knollton Road, an already dangerous intersection of Knollton with Kessler Boulevard, and twice-per-day congestion created by pick-up and drop-off at Crooked Creek Elementary School. Adding an intersection from the proposed development directly onto Knollton, just to the south of the Kessler junction, would only compound these complications. Besides, Knollton itself is simply not wide enough to absorb the traffic entering and exiting a forty-three-unit development.

**Flood control:** Crooked Creek runs through this area and, thanks to surrounding woodlands, overflows only when major storms hit. The proposed development would wipe away much of this protective barrier, and the flood risk would rise. Would the city not prefer retaining these natural flood protections to spending untold sums on stopgap artificial measures after real damage occurs?

**Environmental integrity:** Our local ecosystem is vibrant, blessed with a variety of mammals, birds, and flora, as well as an embracing tree canopy that helps shield us in times of extreme heat. I cringe at the deleterious effects that would be set in motion by the proposed project and its attendant clearcutting, paving, and cheek-to-jowl construction.

For all these reasons, I join other neighbors in opposing the proposed development plan of 13.69 acres of Broadmoor Country Club's property for high density housing and the requested zoning change from SU-34 to D5-II and D4.

Sincerely,

Thomas Kryder-Reid



## Blackham, Kathleen

---

**From:** Dodane, Emily T. <emily.dodane@faegredrinker.com>  
**Sent:** Thursday, September 12, 2024 10:05 PM  
**To:** Blackham, Kathleen  
**Cc:** kelly.lana@icloud.com; Mike Isibel  
**Subject:** Opposition to Rezoning Case Nos. 2024-ZON-073 AND 2024-ZON-073B

Hi Kathleen,

My name is Emily Dodane and my husband and two young children live at 5261 Olympia Drive within the High Knoll Estates neighborhood. I am writing to state my family's opposition to the proposed rezoning off Knollton Road (case numbers 2024-ZON-073 and 2024-ZON-073B).

We have serious concerns regarding the impact of the rezoning and development of high-density housing off Knollton Road as well as the planned relocation of the entrance for the Broadmoor Country Club to Knollton Road. Our concerns relate to (1) safety and increased traffic; and (2) preservation of old-growth trees/wildlife addressed in greater detail below.

- 1) **Safety/increased traffic** – Knollton Road and its intersection with Kessler Boulevard is already dangerous. Traffic is routinely backed up from the traffic lights at Michigan Road near the Indianapolis Fire Station and the side entrance for Crooked Creek Elementary School. I turn onto Knollton Road from Kessler each day taking my kids to and from school. I consider it a blessing I haven't been rear-ended yet as I wait to make the turn. Generally speaking, Knollton Road is not safe for pedestrians. There is no sidewalk, no shoulder, and cars routinely speed. My husband is an avid runner, and I hate when he runs along Knollton. These known safety issues will only worsen if 40+ homes are added along the road and the entrance to the Country Club is relocated to push even more (non-resident) traffic onto the road. We do not want our neighborhood to add to our city's already unacceptably high pedestrian injury numbers.
- 2) **Preservation of old-growth trees/wildlife** – We fell in love with our neighborhood because it is surrounded by mature trees/nature and still accessible to downtown Indianapolis. We've had many chance encounters peering out our windows to spy families of deer and dozens of bird species. We fear that the development of high-density housing will disproportionately and inappropriately displace wildlife and destroy tree cover—**disposing of nearly 8 acres of residential woodland within an environmentally sensitive area**. It will also irrevocably diminish the character of the neighborhood and surrounding area.

I cannot emphasize enough that our neighborhood and surrounding area is truly unique—affording its residents the opportunity to live among mature trees, the sounds of nature, and space to spread out, all while being minutes from the city center. The proposed rezoning and development is incongruent with the surrounding community and will introduce the type of housing my family wished to avoid when making our home here.

We implore you to oppose the proposed rezoning and development plan proposed by Broadmoor Investments, LLC and thank you in advance for your consideration.

Best,

**Emily T. Dodane**

Associate

Pronouns: she/her/hers

emily.dodane@faegredrinker.com

Connect: vCard

+1 317 237 1396 direct / +1 443 676 4305 mobile

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**Faegre Drinker Biddle & Reath LLP**

300 N. Meridian Street, Suite 2500  
Indianapolis, Indiana 46204, USA

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## **Blackham, Kathleen**

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**From:** Jason Mackey <jasonmackey78@gmail.com>  
**Sent:** Thursday, September 12, 2024 11:45 PM  
**To:** Blackham, Kathleen; Delaney, Brienne; Whitaker, Nancy G.  
**Cc:** kelly.lana@icloud.com  
**Subject:** Rezoning cases: 2024-ZON-073 and 2024-ZON-073B

We are writing to express our strong opposition to the proposed development of 13 acres adjacent to Broadmoor Golf Course.

We are the homeowners immediately south of the proposed development. We have lived in the midtown area for nearly 20 years and moved to 5350 Knollton three years ago after ten years on nearby Grandview Dr. We long admired Knollton's dense canopy of trees, rolling terrain, larger lots, and country feel and decided to move a mile down the road. Our historic house was built in 1910 and is situated on 4.1 acres. Many of the surrounding properties have several acres as well and the current zoning allows for generous yards, landscaping, and a gracious and low density feel to the neighborhood.

That the development of the old woods immediately north of us might eventually come was not a surprise, but the disregard for the neighborhood's overall feel and collective will was. The proposal put forth is completely out of character for the neighborhood. The developers propose 4-5+ houses per acre, with 28 of the lots having a width of only 35 ft and the other 15 with only 40 feet. Setbacks are proposed at 5 feet. The development is so dense that approximately 8 acres of urban forest would need to be completely torn down to accommodate the new homes-- with a marked detrimental effect on wildlife and tree canopy. New tree plantings will not make up for this. There may well be places in the city in which a development like this would make sense, but it's not here. It's not the character of our neighborhood.

Further, the developers plan to combine the entrance of the proposed development with that of the golf course. With 43 new homes and all of the golf course traffic (including service vehicles, deliveries, etc.) there would be a substantial burden placed on Knollton. Knollton is a secondary road and the terrain is rolling. Knollton was never meant to bear this kind of burden. It's a two-lane road and there are no sidewalks or shoulders. Walking or biking on Knollton is already hazardous—the bolus of traffic associated with this proposed development would only make things worse. It's no secret either that where Knollton tees into Kessler is a dangerous intersection—it seems unlikely that markedly increasing traffic volume on Knollton will make the situation better.

This proposal disregards the fundamental character of our neighborhood, destroys a substantial amount of urban forest, and places neighbors at undue risk. We reiterate our strong opposition.

Jason and Amy Mackey  
5350 Knollton Road  
317-985-6350

## Blackham, Kathleen

---

**From:** Kurt Gossweiler <kurtrob@sbcglobal.net>  
**Sent:** Thursday, September 12, 2024 5:25 AM  
**To:** Blackham, Kathleen; Delaney, Brienne  
**Cc:** Delaney, Brienne  
**Subject:** Broadmoor CC rezoning

Dear Decision Makers:

The rezoning of the land for the proposed development at the Broadmoor Country Club has, at its heart, few pluses for the neighboring areas and the city. It dramatically changes the heavily wooded area in which it sits, strains the already fragile sewer system in the area (which has flooded twice in the 24 years I have lived there), strains the traffic in the area, and changes the character of the serene neighborhood of which it could be a part. The purpose, of course, of zoning laws is to ensure that certain areas of the city keep the same character instead of changing it, and allows businesses and neighborhoods and people to coexist in harmony instead of conflict and disharmony. I have personally witnessed the lack of zoning laws in Mexico and it is not a pretty sight. Homes of different character butt up against each other and businesses, and areas are a hodge podge of dissimilar buildings and land. You have a beautiful city of which you are wards, and your duty is to see to it that it remains a pleasant place to live. The zero lot line dwellings proposed can be built elsewhere so that they remain true to their surroundings, but this is not the area in which to do it. I urge you to reject the rezoning proposal and to keep our neighborhood as it now is.

Kurt R. Gossweiler, MD, DDS

## Blackham, Kathleen

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**From:** Alex Miser <alexmiser@gmail.com>  
**Sent:** Wednesday, September 11, 2024 1:57 PM  
**To:** Blackham, Kathleen; Delaney, Brienne; Whitaker, Nancy G.  
**Cc:** kelly.lana@icloud.com  
**Subject:** My opposition to rezoning case numbers: 2024-ZON-073 and 2024-ZON-073B  
**Attachments:** My opposition to rezoning case numbers 2024-ZON-073 and 2024-ZON-073B.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.

**To:** Kathleen Blackham, Senior Planner, City of Indianapolis; Nancy Whitaker, Hearing Specialist, Dept. of Metropolitan Development; and Councilor Brienne Delaney  
**Copied:** Lana Gersich  
**From:** Alex Miser  
**Subject:** My opposition to rezoning case numbers: 2024-ZON-073 and 2024-ZON-073B

Dear Kathleen, Nancy and Councilor Delaney,

I'm writing to express my opposition to the following rezoning proposals - case numbers: 2024-ZON-073 and 2024-ZON-073B.

The rezoning proposal submitted by Broadmoor Investments LLC (BMI) would:

- Create serious and dangerous traffic issues;
- Allow for density that completely violates the integrity and merit of our current zoning district guidelines;
- Exacerbate existing drainage problems;
- Decrease property values;
- Allow for the removal of old-growth forest trees and woodlands;
- Threaten the character of our neighborhood;
- Encourage more young, middle- to upper-middle-class Indianapolis residents to consider leaving Marion County for the suburbs where asinine attempts to so egregiously rezone and damage neighborhoods are consistently dismissed.

Our neighborhood is currently zoned D-S Dwelling Suburban which is intended for areas of extreme topography, where it is desirable to permit only low-density development providing for only single-family residential building lots consisting of at least one acre. According to the Zoning regulations, D-S development plans should incorporate and promote environmental and aesthetic considerations presented by existing site considerations including vegetation, topography, drainage and wildlife. **However, BMI is proposing a rezoning that would allow a high-density project, squeezing forty-three (43) homes onto less than 13 acres. This proposal contradicts and frankly is insulting to all the work and neighborhood engagement that went into crafting the latest Comprehensive Plan adopted by the MDC.**

We believe that BMI should respect and abide by current zoning regulations. BMI's proposed development not only ignores the intent of current D-S zoning, but also would result in the negative impacts as stated above on every residential property in our neighborhood regardless of its proximity to Broadmoor Country Club.

Sincerely,

**Alex Miser**

Resident of High Knoll Estates

**To:** Kathleen Blackham, Senior Planner, City of Indianapolis; Nancy Whitaker, Hearing Specialist, Dept. of Metropolitan Development; and Councilor Brienne Delaney

**Copied:** Lana Gersich

**From:** Alex Miser

**Subject:** My opposition to rezoning case numbers: 2024-ZON-073 and 2024-ZON-073B

Dear Kathleen, Nancy and Councilor Delaney,

I'm writing to express my opposition to the following rezoning proposals - case numbers: 2024-ZON-073 and 2024-ZON-073B.

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- Create serious and dangerous traffic issues;
- Allow for density that completely violates the integrity and merit of our current zoning district guidelines;
- Exacerbate existing drainage problems;
- Decrease property values;
- Allow for the removal of old-growth forest trees and woodlands;
- Threaten the character of our neighborhood;
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We believe that BMI should respect and abide by current zoning regulations. BMI's proposed development not only ignores the intent of current D-S zoning, but also would result in the negative impacts as stated above on every residential property in our neighborhood regardless of its proximity to Broadmoor Country Club.

Sincerely,

**Alex Miser**

Resident of High Knoll Estates

## Blackham, Kathleen

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**From:** Cameron Perry <perrycjme@gmail.com>  
**Sent:** Tuesday, September 10, 2024 8:10 PM  
**To:** Blackham, Kathleen  
**Subject:** Fwd: Opposition to Rezoning Case No. 2024-ZON-101

Hello,

This message is in response to the request for local property owners to provide feedback regarding the proposed rezoning described in 2024-ZON-101. We are the property owners of 2005 Lick Creek Drive, which is on the western boundary of the proposed zoning area. We would like to oppose the rezoning effort with the following concerns:

1) The area in question is ecologically sensitive and an environmental outlier in its current condition. Indiana's urban and suburban forests are constantly under threat from localized over development, and home to hundreds of native species of flora and fauna. Lick Creek in particular has been impacted recently by limited water levels and periodic flooding with debris, chemical waste, and other detritus that is carried downstream and which we have worked to clean up and improve over our time living here. Additional housing upstream will only negatively impact this issue. Urban forests provide valuable flood resistance, air and water quality improvements, and are home to numerous native species that are constantly imperiled by continuing development throughout Marion county. Only 9 of the 59 square miles of urban forests are protected by the public parks system, leaving locations like this one vulnerable to rezoning and development changes such as this. Initiatives to plant trees across the county do not account for old growth forests like these being removed, hundreds of years of effort that is easier to simply preserve than recreate. Forested areas provide our community with valuable wildlife interactions, improved quality of life, and a unique local habitat that is constantly under threat.

2) While we appreciate the need for additional housing in the Indianapolis area, there are alternative development areas in more need of the requested dwelling type that would be more suitable and improve those areas more directly than ours. Indianapolis has multiple areas in and around Irvington where existing housing zones are in need of refurbishment or improvement and already have the infrastructure to provide for housing developments with less cost to implement. The cost/value ratio of redeveloping this forested area will be much better spent improving areas around us that would be more easily developed into the housing type proposed. The local housing development to the west of ours is proof positive that the overall housing value is depreciated by new-built townhomes/dwellings; historic neighborhoods like ours are repeatedly under valued by local appraisals which will only be reduced further by this type of construction. More appropriate housing areas exist in numerous locations around our district and beyond, where increased infrastructure makes for an easier solution to provide housing of this type to the communities in need of such improvements.

Please let me know if there are any questions or feedback; we are unable to attend the hearing due to prior work engagements but wanted to voice our concerns and hope that the decision to allow for development in this area and the overall impact is considered appropriately. Thank you for your time.

Thank you,  
Cameron Perry and Rachael Fulper  
2005 Lick Creek Dr., Indianapolis IN, 46203



## Blackham, Kathleen

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**From:** Hopewell, Del S <dhopewel@IUHealth.org>  
**Sent:** Wednesday, September 11, 2024 11:51 AM  
**To:** Blackham, Kathleen; Delaney, Brienne  
**Cc:** kelly.lana@icloud.com  
**Subject:** Broadmoor Country Club property currently proposed by Broadmoor Investments, LLC (BIL)

Hello City of Indianapolis team, I wanted to share that I strongly oppose the rezoning plan from Broadmoor Country Club property currently proposed by Broadmoor Investments, LLC (BIL).

My main concerns are:

**Neighborhood Impact:** The plan will destroy 80% of old growth trees, increasing flooding and removing wildlife habitats. This will also reduce home values. The proposed high-density homes are incongruous with our neighborhood, where recent sales averaged \$530,000 on 1-acre lots.

**Development Plan:** BIL plans to sell 43 plots for \$200,000 each without further involvement. Traffic will be rerouted through our neighborhood, increasing congestion. The plan includes four gated entrances, but lacks turnaround space for emergency vehicles, making it impractical and unsafe.

**Infrastructure Impact:** The increased traffic will strain our existing roads, leading to more wear and tear and higher maintenance costs. Our sewer system, already problematic, will be further burdened, increasing the risk of overflows and backups. The lack of proper planning for utilities and emergency access will compromise the safety and functionality of our infrastructure.

**Wildlife Impact:** The removal of old growth trees will destroy habitats for local wildlife, including deer, raccoons, coyotes, opossums, and foxes. This loss of habitat will force these animals to relocate, potentially leading to more wildlife encounters in residential areas and disrupting the local ecosystem. The reduction in tree cover will also impact bird populations and other smaller species that rely on these trees for shelter and food.

I do not support the proposed rezoning and development plan of 13.69 acres of the Broadmoor Country Club property.

I do not support the proposed change of zoning from SU-34 to D5-II and D4 zoning.

I feel strongly that this proposal is significantly out of character with the surrounding neighborhoods and inappropriate for this area.

Thank you for your time.

Del Hopewell – Architect Senior – Unified Communications  
Indiana University Health  
Office Hours Monday – Friday 7:30 am – 4:30 pm

My name is William Sando, and I have resided with my wife in High Knoll Estates at address 5234 Olympia Drive beginning in fall, 1989. This location has provided us a protected area for raising our two sons, who attended Crooked Creek Elementary School as part of Washington Township Public Schools, and its location has been near ideal in affording me rapid access to both Methodist and St. Vincent 86<sup>th</sup> Street Hospitals to provide emergency patient care whilst in my limited "off" time providing a unique mid-town place of quiet refuge and natural beauty.

I was baffled recently to be asked by a member of the BIM (Broadmoor Investment Group) to craft a letter and then to circulate it to my neighbors in High Knoll Estates praising a planned home-building project. My response was that not only had I **not** been given any notification of such plans, but that also fundamentally lacking was any provided evidence of an impact study, specifically a traffic study. I attended the August 5<sup>th</sup> meeting of neighborhood members at Broadmoor Country Club with this investment partner and his colleagues, at which time along with other admissions, was the frank acknowledgment that in the years of the project's planning there had been no traffic study. A second issue which I had cited in my e-mail response was absence of any commentary about planned management of above-ground vs. below-ground electric power provision to the plat...our neighborhood frequently experiences power outages not just arising from downed lines within our immediate neighborhood, but also from line disruptions in the surrounding neighborhoods. This proposed housing development, if powered via above-ground lines, could potentially add significantly to the frequency of our outages, even with the recent installation of below-ground power capabilities in High-Knoll Estates.

The environmental impact of this planned construction is significant: the existing tree canopy is a resource of shade for us humans, a protective windscreen for the trees which populate the adjacent properties, a vital habitat for animals, a significant (now scientifically proven) protection of the surrounding plant/forest biome through the underground communication properties of mature tree roots, the absorption of rainwater from surfaces in this ESA (Environmentally Sensitive Area) of the Crooked Creek flood plain which even now periodically floods (e.g. Mennonite Church on Knollton), and finally the removal via filtering properties of extensive tree root systems of the pollutants present in runoff from the Broadmoor Country Club Golf Course grounds treatments of fairways and greens (amidst its own relative paucity of trees), which are applied to ensure a marketable green experience for golfers.

The safety impact of high additional traffic volumes from Broadmoor AND proposed plat residents absent Knollton shoulders or traffic lights, with cars funneled onto Knollton, would not only affect the wildlife (roadkill), but also the safety of first responders at the Crooked Creek Fire Station, the safety of elementary school children who attend nearby Crooked Creek School, the safety of walkers and joggers (including my wife who nearly daily walks Knollton to combat her relentless rheumatoid arthritis), and the safety of numerous large bicycling groups who in summer and warm fall afternoons/early evenings ride en masse from 44<sup>th</sup> Street to turn onto Knollton heading north, and then onto 51<sup>st</sup> Street heading east toward Grandview. The additional noise and local pollution impacts of these added motored vehicles, at least in the near-term with the predilection of the American public to drive gasoline-powered cars and trucks, is another harmful implication of this project.

Property value concerns aside, the above issues headline why I am opposed to the present plans.

Thank you for your kind attention.... William C. Sando, M.D.

## Blackham, Kathleen

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**From:** Robert Bader <bader5262@mac.com>  
**Sent:** Friday, August 16, 2024 9:11 AM  
**To:** Blackham, Kathleen; Whitaker, Nancy G.  
**Cc:** Toni Bader; Lori Miser; Scott Monk  
**Subject:** Broadmoor Development Plan

**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.

My name is Robert Bader. My wife and I have lived at 5262 Roland Dr., in the High Knoll Estates (HKE), since February 1975 – almost 50 years. We bought our house for 3 reasons: it was perfect to raise our growing family, the neighborhood was close to downtown and the surrounding area was beautifully filled with big trees. Then there were 17 houses in our immediate neighborhood. Today there are 35 unique and beautiful homes in the Estates.

As a former member of Broadmoor Country Club we were aware that the property and buildings used by the Club were sold to an investment group (Broadmoor Investments, LLC, or BIL) to pay off the Club's debt. We were told that the property had to be maintained as a golf club as long as there were at least three other (named) clubs operating in relatively close vicinity. We also understood that the Investment Group planned to build high quality homes on the property not being used as a gold course, with club membership attached, to recoup their investment.

We recently found out that Broadmoor Investments has other plans. No one in our development (HKE) which is adjacent to the Club's 10<sup>th</sup> Fairway, swimming pool and tennis courts, received notice that a development plan had been filed. The neighbors living on Knollton Road, directly across from the proposed development and directly affected by it, reached out, and shared the development plans, with many of us in HKE.

I would like to register our total opposition to this rezoning plan for several reasons, which I'll group into two categories: Effect on our neighborhood, and zoning/development plan itself.

**1<sup>st</sup>, the effect on our neighborhood:** This plan both destroys the environment in our neighborhood by planning on tearing down about 80% of the old growth trees in the designated area. These trees help shade the neighborhood, keeping it cooler in the summer and help control ground water. Our neighborhood sits on Crooked Creek. When there are significant rainstorms, the creek rises and we get significant flooding. We've already had sewer problems on this property and removing the trees can only increase the flood problems, remove wildlife habitat (we have deer, racoons, coyotes, opossums and at least one fox in our neighborhood) and make it warmer in the summer.

In addition to the loss of vegetation and resultant problems, the proposed development will significantly reduce the value of all of our homes. I understand that the BIL members are entitled to make a "fair" profit off of their investment. By the same reasoning, I, and all of our neighbors

are entitled to keep the value of our homes. After seeing the proposed Plat, I drove up and through Augusta Acres, off of Michigan Road and 79<sup>th</sup> Street. This area was developed specifically for high density, affordable homes. Those are prices between \$200,000 and \$400,000. They are nice homes, in a nice neighborhood, devoid of trees and sitting cheek by jowl with about 10 feet separating each house. That's exactly what the plat proposes for the 1<sup>st</sup> phase of development – 15 5,000 sq ft homes on less than 3 acres. The last 3 homes sold in our neighborhood (in 2022,3 & 4) averaged \$530,000 each on 1 acre lots. Bigger homes on smaller lots are incongruous with the neighborhood.

One of my problems with this whole plan, is that BIL is not planning on doing anything more than selling the lots to recoup double their investment, by selling 43 plots for \$200,000 each. Once sold BIL will not be the home builder or developer and if the zoning change is approved, the developer will be able to build whatever they want and sell the homes for whatever they can.

**2<sup>nd</sup>, the development plan:** In the meeting between the developers and concerned neighbors on August 5<sup>th</sup>, the BIL members mentioned that they planned on closing-off the main entrance to Broadmoor on Kessler Boulevard, because the increased amount of traffic on Kessler (both ways) has made it difficult for members to get in and out of the Club. That means all traffic into and out of Broadmoor would be routed through this new neighborhood. While several of BIL's members belong to Broadmoor Country Club, and I'm sure they are among many who dislike the problems of getting into and out of the Club from Kessler, imagine how much traffic there will be through this new "high-end" neighborhood.

The plan also calls for four "gated" entrances. Three are on the west side of the development: one directly across from the Country Club's main building, one to a parking lot by the Club's swimming pool, and one at the end of a 20 foot alleyway that leads directly to the Club's delivery entrance. The fourth gate is off the entry road from Knollton leading to the first 15 planned houses. Supposedly the gates will be closed because the BIL members see this as a high-end home development and plan on selling it as "limited access".

Based on the submitted Plat, there are no places to turn around in the development. You have to drive through it to get out, from whichever direction you came in. Imagine how fire department equipment, ambulances, garbage trucks, etc. are going to come in and maneuver in the development even with a 50 foot wide roadway – they won't be able to. Frankly, in addition to this new neighborhood looking out of place, there will be a lot more traffic into and through the development.

Finally, there's a 35 MPH speed limit on Knollton ignored by 90% of the people who use Knollton on a regular basis. The Police Department used to occasionally monitor traffic on Knollton to reduce speeding, but refuse to do it any longer. And in addition, although the development is close to limited shopping, including a Walmart and several fast-food restaurants, there are no sidewalks on Knollton, nor on Kessler or Michigan Road and none planned for the development. Walking in Knollton is dangerous now.

I want to thank you for your attention and re-iterate that we are totally opposed to this development.

Robert N. Bader

A handwritten signature in black ink, appearing to be 'RB', with a horizontal line extending to the right.

Toni R. Bader

Bob Bader  
bader5262@mac.com  
317/443-4829

## Blackham, Kathleen

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**From:** Jason Mackey <jasonmackey78@gmail.com>  
**Sent:** Wednesday, July 10, 2024 6:31 PM  
**To:** Blackham, Kathleen  
**Subject:** proposed development

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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Hi Ms. Blackham--

We live at 5350 Knollton Rd and we got a notification about Broadmoor proposing development and moving the country club entrance from Kessler to Knollton. We have concerns about moving the entrance from a major thoroughfare to a smaller road. The proposed density of the development is also out of character for the area.

Do you know if staff have made a recommendation on this proposal yet? Thanks

--jason

## **Blackham, Kathleen**

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**From:** Ellen Morley Matthews <e2m2@sbcglobal.net>  
**Sent:** Monday, July 15, 2024 5:10 PM  
**To:** Joanna Franklin  
**Cc:** Scott Monk; Blackham, Kathleen; Delaney, Brienne  
**Subject:** Broadmoor CC Development

Joanna,

Thanks again for taking the time to talk to me earlier today about Broadmoor's proposed development. As we discussed, we need a request for an automatic continuance for the 7/25/24 Public Hearing regarding this development and its impact on our neighborhood. Per your instructions we are submitting herein some of the concerns we and our neighbors have regarding Broadmoor's plan to change current zoning regulations that dictate development in our neighborhood.

**Density** We are currently zoned D-S which requires a minimum lot area of one acre. Broadmoor is seeking D-4 rezoning Case#2024-ZON-073 which has a typical density of 4.2 units per acre and D-511 Case#2024-ZON-073B which we understand would allow for the most density possible and is described as follows: [The D-511 district is intended for small-lot housing formats, primarily for small, detached houses, but also including a mix of small-scale multi-unit building types. This district can be used for new, walkable suburban neighborhoods or for infill situations in established urban areas, including both low density and medium density residential recommendations of the Comprehensive Plan, and the Suburban Neighborhood or Traditional Neighborhood Typologies of the Land Use Pattern Book.](#)

**Drainage** Years ago Broadmoor created what was supposed to be a dry detention pond, not intended to hold water, but instead Broadmoor created a 'decorative' pond with a fountain, incorrectly using the pond and pumping water into it which caused flooding in adjacent properties such as ours and our neighbors.

**Traffic** Broadmoor's proposed development would create even more traffic issues/problems than what our neighborhood already has. Knollton Road is a rather narrow two lane road with no shoulders. Broadmoor's proposal would route **all** traffic out onto Knollton Road, not just entrance into its proposed housing development but traffic for the Club facility and the golf course as well.

**Property Values** Our neighborhood is unique in so many ways. After we purchased our property in 1985 we met with a representative from the Department of Natural Resources to

learn about the old growth forest on our land. We were advised that we have the last remaining urban forest in Marion County. The residential architecture of our neighborhood is decidedly eclectic. Our D-S zoning district clearly follows the statement of purpose which is described as follows: [Sec. 731-202. D-S dwelling suburban district regulations. Statement of purpose.](#) The D-S district is intended for use in areas of extreme topography, areas conducive to estate development, or areas where it is desirable to permit only low density development (such as adjacent to floodplains, aquifers, urban conservation areas, within the extended alignment of airport runways, etc.). Of the dwelling districts providing for only single-family dwellings, the D-S district provides the lowest density in the ordinance. The D-S district provides for single-family residential building lots consisting of at least one acre. A typical density for the D-S district is fourtenths (0.4) units per gross acre. This district represents the very low density residential classification of the comprehensive general land use plan. This district does not require public water and sewer facilities. Development plans should incorporate and promote environmental and aesthetic considerations, working within the constraints and advantages presented by existing site considerations, including vegetation, topography, drainage and wildlife (refer to the cluster subdivision option of section 731-200). Broadmoor's proposed development of cookie cutter housing not only ignores the intent of our current D-S zoning, but also would dramatically reduce the value of every residential property in our neighborhood regardless of its proximity to Broadmoor. This blatant disrespect of our designation as a D-S Zoning District is unacceptable to say the least.

**Zoning Regulations** Broadmoor's intention to turn its property into housing has been in the wind for many years. Although we understand Broadmoor's ownership wanting to repurpose its asset, we strongly believe that Broadmoor should respect and abide by the current zoning regulations just as we did when creating and selling a parcel of our land in 2021. To allow such a dramatic shift in the zoning of our neighborhood is patently unfair and unreasonable.

It is challenging to succinctly state in an email all of the concerns that we and our neighbors have regarding Broadmoor's proposed development. There is so much more information/data that needs to be compiled. Everyone who lives in our neighborhood needs to be informed as to what Broadmoor is proposing. Although Broadmoor's lawyers did meet the mailing requirements for the legal notice of the DMD July 25th public hearing, 23 days is just not enough time for us to be as prepared as possible for that hearing. Additionally there are neighbors who did not receive the hearing notice because it was not required who most definitely need to know about what Broadmoor is proposing. **It is critical that either Crooked Creek Alert or Councilor Brienne Delaney request a continuance of the 7/25/24 hearing.** It is our understanding that upon receipt of the request, the first continuance is automatic and cannot be denied and that additional continuances can be requested for cause.



We appreciate your assistance, Joanna. Fyi Scott Monk and his family reside at 5425 Knollton Road and are our immediate neighbors to the south. As you can see I've copied Scott on this email. In a separate email I will forward to you Scott's 7/13 email to Brienne as well as my 7/11 email to Brienne.

We look forward to hearing back from you and again, we are grateful for your willingness to help our wonderful neighborhood navigate these very troublesome waters.

Ellen

Ellen Morley Matthews  
David C. Matthews  
5505 Knollton Road

## **Blackham, Kathleen**

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David C. Matthews  
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