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January 11, 2023

Via Email: eboyd@idem.in.gov
Eva Boyd, Wetland Project Manager
Wetlands Section, Office of Water Quality
Indiana Department of Environmental Management

**RE: Public Comments of the Hoosier Environmental Council on the State
Isolated Wetland Individual Permit; Public Notice No. IWIP 2022-1108-30-
EKB-A (December 12, 2022)**

Ms. Boyd,

Please accept these brief public comments on behalf of the Hoosier Environmental Council (HEC) regarding the application for a State Isolated Wetland Permit (referred to as the "Permit") submitted by Argo Family Storage LLC (referred to as the "Applicant") as part of its proposal to impact an isolated Class II wetland to construct a storage facility and access road.

Founded in 1983 as an Indiana not-for-profit organization, HEC works towards creating a healthy environment and sustainable economy for our state. HEC is part of a coalition of organizations in central Indiana, funded by the Nina Mason Pulliam Charitable Grant, that are working together to protect the White River watershed. Part of this work includes getting involved during the permitting process to advocate for responsible development. The proposed development is in the White River watershed, approximately 2,500 feet away from Indian Creek, a tributary to the White River. The Permit will result in permanent wetland impacts, and therefore, is of interest to HEC.

HEC appreciates that the Applicant included an analysis of whether the proposed activity is reasonably necessary or appropriate. In their analysis, the Applicants cite a national demand for self-storage as the justification for the wetland impacts.¹ However, the Applicant does not discuss whether there is local demand for storage. There at least ten other storage facilities within proximity to the proposed storage facility, raising doubt about the local demand for storage.²

The Permit, which is justified by citing demand for a facility, raises the question of the need or demand for wetlands. Indiana has lost over 85 percent of its original wetlands, and it can

¹ Page 4-5, State Isolated Wetland Permit Application.

² Exhibit 1, Storage Facilities Map.

be argued that wetlands are also in demand.³ The Indiana Wetland Task Force concluded that Indiana cannot afford any further loss of wetlands. In fact, the Indiana In-Lieu Fee (ILF) Program testified for the Wetland Task Force that the loss of wetlands is currently happening fastest in Central Indiana, and that the ILF Program is finding it difficult to find sites for mitigating those losses. Since Indiana cannot mitigate losses that have already occurred in Central Indiana, it is apparent that unnecessary wetland losses cannot be accommodated.

Additionally, the Applicant describe measures to avoid wetlands and concludes that they must be impacted due to road accessibility issues.⁴ Establishing a road in the middle of forested wetland habitat will create disruptions for wildlife and impede with hydrologic function. Since Indiana cannot afford to lose or degrade more wetlands, and that a generous amount of storage facilities already exist in the area of this proposal, HEC requests that the following questions be addressed prior to the approval of the Permit.

1. Does the local demand for self-storage facilities outweigh the need for wetlands?
2. What is the demand for self-storage facilities in Indiana, Marion County, and/or Hancock County?
3. Does this storage facility differ from the ones that are already present?
4. Are the present storage facilities at capacity?
5. What is the feasibility of connecting to the road through the existing development (True Brands warehouse facility) that abuts the eastern property line?

HEC is grateful for the opportunity to comment on this Permit. As always, thank you for considering HEC's concerns, and I look forward to your response.

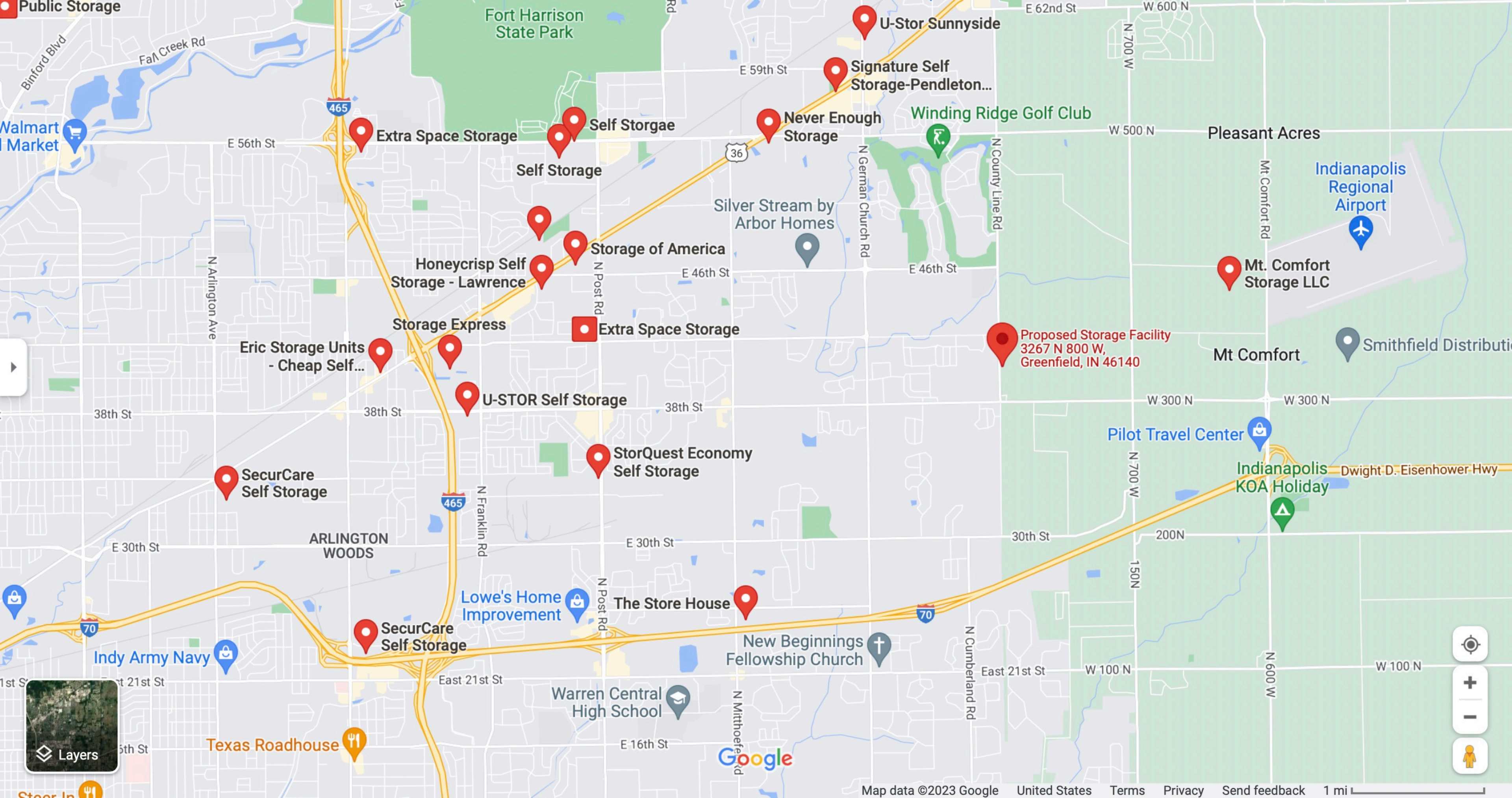
With Regards,



Susie McGovern
Senior Water Policy Associate
Hoosier Environmental Council

³ Indiana Wetland Task Force report.
<https://iga.in.gov/legislative/2022ss1/publications/agency/reports/wtf/>.

⁴ Page 4, State Isolated Wetland Permit Application.



Public Storage

Walmart
Market

Fort Harrison
State Park

U-Stor Sunnyside

Signature Self
Storage-Pendleton...

Never Enough
Storage

Extra Space Storage

Self Storgae

Self Storage

Self Storage

Storage of America

Honeycrisp Self
Storage - Lawrence

Storage Express

Extra Space Storage

Eric Storage Units
- Cheap Self...

U-STOR Self Storage

StorQuest Economy
Self Storage

SecurCare
Self Storage

Proposed Storage Facility
3267 N 800 W,
Greenfield, IN 46140

Mt. Comfort
Storage LLC

Indianapolis
Regional
Airport

Smithfield Distributi...

Pilot Travel Center

Indianapolis
KOA Holiday

ARLINGTON
WOODS

Lowe's Home
Improvement

The Store House

New Beginnings
Fellowship Church

SecurCare
Self Storage

Indy Army Navy

Warren Central
High School

Texas Roadhouse

Layers

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