

# **Alternative Analysis**

## *Miles Farm Residential Subdivision – Danville, Indiana*

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### **1. Basic Project Purpose**

The Miles Farm, a 400-acre plus subdivision, involves the development of a new residential subdivision by D.R. Horton, along with the typical required infrastructure of roads, house pads, utilities, storm-water features, common areas, etc.

### **2. Overall Project Purpose and Need**

The overall purpose is to create a new residential subdivision providing 900 +/- building lots in Danville, Indiana, to help meet the demand for new housing in Danville and the surrounding Indianapolis Metropolitan area.

### **3. Special Aquatic Sites**

No special aquatic sites observed or recorded by the IDNR.

### **4. Practical Alternatives**

#### ***Alternative 1: Total avoidance of all wetlands and waters requiring no action.***

This alternative is determined not to be practical due to requirements and requests by the Town of Danville in regard to traffic flow patterns within and around Danville and U.S. Highway 36, as well as the existing location of sanitary sewers on the east side of the property. Aside from the location of the existing sewers, Danville wanted the extension of an existing stub-street through the subdivision to provide connection between Danville North Elementary School and Danville Community High School in order to reduce school traffic through Danville and off of U.S. Highway 36.

Additionally, the Town of Danville and Hendricks County require a level of density in residential units to provide the necessary tax base required to accommodate the essential municipal services of fire, police, roads, parks, other public works, etc.

#### ***Alternative 2: Locate another property.***

This alternative is also not feasible, as this location is in a prime area for residential housing due to the presence of sanitary sewers, city water, and other necessary utilities. It is within the metropolitan area of Danville, adjoining other existing land developments

***Alternative 3: Full development of the site.***

The engineering and environmental land development team understood from the beginning the need to minimize wetland and stream impacts. Therefore, full development of the site was never considered as a possibility.

***Alternative 4: Submitted minimized development plan***

The submitted plan, given the circumstances mentioned above, was felt to be the only feasible alternative. It is important to understand that several alternative plans that would have further impacted ephemeral channels as well as the channel of Mill Creek were not used. The submitted plan shows the avoidance of Mill Creek and minimization of impacts to further woodland and ephemeral channels.



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Eric J. Holcomb**  
*Governor*

**Bruno L. Pigott**  
*Commissioner*

June 21, 2022

Susie McGovern  
Hoosier Environmental Council  
3951 North Meridian Street, Suite 100  
Indianapolis, IN 46208

Dear Ms. McGovern:

Re: Isolated Wetland Individual Permit and Section  
401 Water Quality Certification  
Project: Miles Farm  
IDEM Number: 2022-339-32-ERL-A  
COE Number: LRL-2021-1093-sjk  
County: Hendricks

Thank you for your letter regarding the proposed Miles Farm project in Hendricks County. Your interest in Indiana's water quality is appreciated.

In your letter you provided the following comments on the proposed project:

- I. Wetland 1 qualifies as a Class III wetland
  - It is the opinion of IDEM that based on the data provided in the delineation and the State Regulated Wetland Classification Determination Worksheet that Wetland 1 qualifies as a Class II wetland due to its location on the edge of an agricultural field, disturbance from agricultural machinery, and correspondence from the Indiana Department of Natural Resources Division of Nature Preserves stating that there are no threatened or endangered species located within a half mile of the project area. Furthermore, the contiguous forested wetland off-site is not proposed to be impacted.
- II. There is no alternatives analysis in the application.
  - IDEM requested a more detailed alternatives analysis from the applicant for the proposed project. According to the application, the wetland is being impacted in order to construct a drainage swale that is necessary to construct the required infrastructure for the residential development. Of the 3,072.5 linear feet (lft) of ephemeral streams on site, 2,027 lft of ephemeral channels and the entire 2,003 lft of the intermittent headwaters of Mill Creek are being avoided.



III. Other issues related to jurisdictional wetlands and the completed wetland delineation.

- According to correspondence with Sarah Keller with the U.S. Army Corps of Engineers (USACE), the USACE reviewed the wetland delineation and determined that the consultant properly identified all potential aquatic resources in the review area using the 1987 Wetland Delineation Manual and Midwest Regional Supplement. Grassed waterways lacking wetland criteria do not automatically become jurisdictional wetlands simply for their geographic proximity to a Water of the United States. Therefore, the USACE respectfully disagrees with HEC's comments in that regard. Any further questions related to the review of the wetland delineation and jurisdictional determination should be directed to the USACE.

Following receipt of your letter IDEM acquired a copy of the alternatives analysis. After reviewing the report, project application, and correspondence from the applicant, IDEM has issued a decision in response to the application. A copy of the requested alternative analysis and a copy of IDEM's decision is attached.

If you have any questions, feel free to contact me at [ELish@IDEM.IN.Gov](mailto:ELish@IDEM.IN.Gov) or at 317-232-0516.

Sincerely,

A handwritten signature in black ink that reads "Erin R. Lish". The signature is written in a cursive style and is positioned above a vertical dotted line.

Erin Lish  
Wetland Project Manager  
Wetlands and Stormwater Section  
Office of Water Quality

Attachment: Alternative Analysis  
2022-339-32-ERL-A