WETLANDSNOTWAREHOUSES.COM

April 20, 2026

Metropolitan Development Commission
Suite 1842, City County Building
200 East Washington Street
Indianapolis, IN 46206

Re: Opposition to **Petition Case 2026-MOD-003** – Proposed Truck and Heavy Equipment Sales, Rental, and Repair Facility | **Parcel:** 3001773 | **Address:** 8600 Combs Road, Indianapolis, Indiana

Dear MDC Members,

On behalf of the Wetlands Not Warehouses Franklin Township (WNWFT) Task Force, we respectfully submit this letter in strong opposition to **Petition Case 2026-MOD-003**, which proposes the development of a Truck and Heavy Equipment Sales, Rental, and Repair Facility on **Parcel 3001773 located at 8600 Combs Road**.

This proposed development would directly impact a portion of one of the last remaining high-quality wetlands within the Pleasant Run Creek watershed—an irreplaceable natural asset located adjacent to a church, established residential neighborhoods, and a family farm along a two-lane roadway not designed for industrial-scale traffic. The proposed use is incompatible with both the site's environmental significance and the surrounding land-use pattern.

Zoning Incompatibility and Comprehensive Plan Misalignment

The proposed heavy industrial use is fundamentally inconsistent with the existing zoning context and surrounding land uses, which are characterized by residential development, institutional use (church), and agricultural land. The intensity, scale, and operational characteristics of a truck maintenance and heavy equipment facility—including outdoor storage, high noise levels, extended operating hours, and frequent heavy truck traffic—create clear land use conflicts.
Furthermore, the proposed development is not aligned with the goals and policies of the City of Indianapolis Comprehensive Plan, which emphasizes:

- Protection of environmentally sensitive areas, including wetlands and flood-prone lands
- Compatibility of adjacent land uses
- Preservation of neighborhood character and quality of life
- Strategic and sustainable infrastructure planning

Introducing an industrial use of this magnitude into a predominantly residential and environmentally sensitive corridor undermines these guiding principles and sets a concerning precedent for future encroachment.

Environmental and Infrastructure Impacts

The parcel in question and surrounding parcels contain sensitive ecosystems including lowland marshes, an old-growth hardwood forest, and upland prairie. These ecosystems provide critical habitat for a wide range of plant and animal species, including bald eagles and sandhill cranes, which are a state-threated species.

Equally important, the wetland functions as a form of natural or green stormwater infrastructure. Providing over 225,000 cubic feet of stormwater storage capacity, the wetland acts as a natural sponge during heavy rainfall events, significantly reducing flood risk for nearby homes and properties. At a time when development pressures are intensifying across Indianapolis, the preservation of such natural flood-mitigation systems is essential. The proposed development would introduce large expanses of impervious surface, significantly increasing stormwater runoff, degrading water quality, and compromising the wetland's flood control function within the Pleasant Run Creek watershed.

Watershed management plans for the Pleasant Run Creek watershed state that rapid urbanization is contributing to wetland loss, and that wetlands are virtually non-existent in this sub watershed, making the wetland a rare regional asset worthy of protection.[1] In addition, data from the US Fish & Wildlife Service's National Wetland Inventory (NWI) show mapped wetlands in this region are historic – meaning that they could be remnants of a lost wetland ecosystem and are a target area for wetland reestablishment and conservation.

Lastly, Combs Road is a narrow, two-lane roadway not designed to accommodate sustained heavy truck traffic. The anticipated increase in heavy-weight vehicles would accelerate pavement degradation, strain existing infrastructure, and create safety concerns for residents, school traffic, pedestrians, and nearby churchgoers. Road weight limitations exist to preserve roadway integrity; however, routine industrial truck traffic would inevitably lead to costly maintenance and heightened safety risks.

Community Vision and Alternative Use

In contrast, the WNWFT Task Force has been actively advancing a community-driven vision to preserve the 45-acre tract that is adjacent to this land as a nature preserve and public green space. This vision includes forming a collaborative partnership among stakeholders to protect and enhance this unique environmental resource while improving the quality of life for Franklin Township residents.

The task force has been working closely with key partners, including the Franklin Township Civic League and the Hoosier Environmental Council, to develop the Combs Road Wetland Master Plan. This plan will serve as a foundation for securing funding for land acquisition and establishing a long-term land trust.

Notably:

- Indy Parks has expressed support for the site as a future nature preserve or park, contingent upon land acquisition and donation.

[1] Public Comments of the Hoosier Environmental Council on the Joint Application for an Isolated Wetland Individual Permit and Section 401 Water Quality Certificate for the I-65 and County Line Road Development, IDEM ID # 2023-605-49-WLR-A, Hoosier Environmental Council (2023). Accessible at https://www.hecweb.org/wp-content/uploads/2023/11/HEC-Public-Comments-on-the-Joint-Application-for-the-I-65-and-County-Line-Rd-Development-FINAL.pdf.

- A $10,000 contribution from GPCM County Line Partnership has been allocated to support development of the Wetland Master Plan, demonstrating recognition—even among development stakeholders—of the importance of preserving vital greenspace.

Broader Community Benefits of Preservation

Preserving this wetland aligns with citywide goals and provides substantial long-term benefits, including

- **Environmental resilience:** Protection of biodiversity and wildlife habitat, natural flood mitigation, and improved water quality
- **Community wellness:** Access to green space, which supports mental and physical health
- **Educational opportunities:** A living classroom for local schools and community engagement
- **Equity and quality of life:** Ensuring access to natural spaces in a rapidly developing area

Wetlands are one of the most effective natural systems for carbon sequestration, contributing to broader climate and sustainability goals.

Conclusion

The proposed development under Petition Case 2026-MOD-003 is incompatible with the site's environmental significance, surrounding land uses, and infrastructure limitations. It conflicts with established planning principles and the City's Comprehensive Plan, and it would result in the irreversible loss of a critical natural resource.

We respectfully urge the Department of Metropolitan Development to deny **Petition Case 2026-MOD-003,** and instead support the preservation of the original commitments to protect the natural wetland area and community for current and future generations.

Respectfully,

Wetlands Not Warehouses Franklin Township Task Force (WNWFT)

Under the Umbrella of the Franklin Township Civic League

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