Hoosier Environmental COUNCIL

All. Together. Now.

May 20, 2026

Via Email: Kathleen.Blackham@indy.gov
Kathleen Blackham, Senior Planner
Indianapolis Metropolitan Development Commission

RE: Public Comments of the Hoosier Environmental Council on 2026-MOD-003

Ms. Blackham,

Please accept these brief public comments on behalf of the Hoosier Environmental Council ("HEC") regarding the proposed petition 2026-MOD-003 ("Petition") to modify several commitments, including but not limited to, allowing for a truck and/or heavy vehicle sales, rental, and repair facility on the 10-acre parcel 3001773 ("Parcel") located at 8600 Combs Road.

The Parcel is located on a portion of a 19-acre environmentally significant wetland – one of the last remaining, high-quality wetlands in the Pleasant Run Creek Watershed.[1] The wetland is a valuable community asset: it provides flood storage for the community; filters and purifies water; serves as habitat to vulnerable wildlife species such as sandhill cranes; provides carbon storage, helping to mitigate climate change impacts; and is a vital community and educational resource.

Any development, regardless of intended use or current zoning, does not preclude obligations set forth in the I-65 and County Line Road Strategic Plan ("Plan"),[2] which asserts the following recommendations for development in this area:

- *Sensitively incorporate the natural assets* of the area (significant woodlands, wetlands, ridgelines) into development.
- *Environmental characteristics* of the land *should have a modifying effect on the primary land use.*
- *The recommended land use and the environmentally sensitive qualities of a site should be considered together* in making decisions about development.
- *Careful attention should be given to [wetlands] so that [they] may be conserved.*

[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.
[2] Accessible at https://citybase-cms-prod.s3.amazonaws.com/98748e6140d34b9f8e5977bff6593d10.pdf.

The Plan makes clear that a site's natural environment should be incorporated, conserved, and considered as part of the development process.

In addition to the planning recommendations which encourage wetland protection, the wetland is also a current conservation target by a Franklin township-based grassroots community group, Wetlands Not Warehouses Franklin Township ("WNWFT"), which seeks to protect and preserve the wetland and transform it into a cultural, educational, and recreational amenity.[3] WNWFT and the Franklin Township Civic League, with support from HEC, have been working together to develop a Combs Road Wetland Master Plan which will guide land acquisition efforts and support the vision for a public park. Even more, Indy Parks has expressed support for the site as a future nature preserve or park, and WNWFT has received a $10,000 contribution from GPCM County Line Partners to support the development of the Combs Road Wetland Master Plan.

These efforts demonstrate an upswell of momentum and interest in protecting and preserving the wetland. Approval of this Petition is contradictory to planning guidelines set forth by the city and will directly interfere with community efforts to establish a visionary park and protect this high-quality wetland ecosystem. For these reasons, HEC recommends that the Hearing Examiner deny the proposed Petition.

Sincerely,

Susie McGovern

Susie McGovern
Water Science and Sustainability Specialist
Hoosier Environmental Council

[3] Wetlands Not Warehouses Franklin Township Webpage. Accessible at https://www.wnwft.org.