

## Save The Eagle Creek Forest from Commercial Rezoning

Dear Councilor,

I write today to urge you to reject the commercial rezoning on case 2023-CZN-814 in Pike Township.

The **Eagle Creek Forest** surrounds Eagle Creek. It extends along tributary streams and drainageways in a continuous, interconnected network of trees and greenery. The Eagle Creek Forest contains woodlands, wetlands, and neighborhoods in Traders Point west of I-465. It includes the famous Eagle Creek Park and a reservoir that is a major source of public water supply for Indianapolis.

The Eagle Creek Forest will experience **catastrophic environmental degradation** *IF* the City Council approves rezoning of this 200-acre site in Traders Point from residential and agricultural use to commercial zoning. The site is west of I-465 between 86th St. at Conarroe Rd. and 79th St. at Marsh Rd.

Much of the rezoning site is currently listed in the City's Comprehensive Plan as an "**environmentally sensitive area**", which designation is defined as "intended for areas containing high quality woodlands, wetlands, or other natural resources that should be protected". Commercial development contradicts the purpose of this classification, which is "to prevent or mitigate potential damage to these (natural) resources caused by development." While the rezoning is proposing to protect *some* of this area, it will destroy as many as thirty acres of wetland and forest in the environmentally sensitive area and at least 150 heritage trees. The site plan approved with the rezoning includes no commitment to replace these heritage trees and only a vague commitment to protect some of the forest, without any enforcement guarantees such as deed restrictions or conservation easements.

Family homes and agriculture are the right fit for this environmentally sensitive area. City planners have already zoned the land appropriately. The rezone would completely upend the residential and rural typology for this area in the City's Comprehensive Plan.

The proposed rezoning site is **part of the Eagle Creek Forest**. It contains approximately 125 acres of forest, including approximately 40 acres of old forest similar to what is in the dedicated State Nature Preserves in Eagle Creek Park. The site includes two wetland lakes and wetland soils. The area is teeming with deer, fox and other wildlife and there is evidence and habitat for **endangered and threatened** bats, birds, reptiles, and insects there. Level ground on the site contains soils that are rated highly productive for agriculture and had a farm for many years. Commercial development will fragment forests and wetlands, disrupt drainage, destroy good farmland, and destroy and degrade valuable wildlife habitat and open space.

**All of the water** on the 200-acre rezoning site, along with water from some 60 acres of commercial development east of I-465 drains westward in four streams, descending 100 feet in elevation in less than a mile to become Hopewell Creek that **enters Eagle Creek** near 79th St., which is the northern waterfowl and migratory bird habitat of Eagle Creek reservoir.

**IF** the City Council approves the rezoning to commercial use and the land is developed according to the current site plan, 133 acres will become buildings, parking lots, sidewalks, and roads—"impervious surfaces" that prevent precipitation from soaking into the ground. Each **acre** of impervious surface that receives the Indianapolis annual average 43.63 inches of precipitation can generate 1.2 million gallons of **new stormwater runoff**. Each new acre developed increases runoff.

**Flood prevention** can be assisted by wise land use decisions that retain forests and wetlands such as those in the Eagle Creek Forest. The second largest flood ever recorded on Eagle Creek was just 10 years ago in April 2013. It raised water levels 12 feet on Fox Lake at Hopewell Creek because Eagle Creek was already full. Road bridges in Traders Point and Zionsville were under water during this major flood. Less severe floods on Eagle Creek continue to occur without a new source of runoff.

According to recent research, intense and prolonged **high-volume precipitation** events delivering several inches per hour are expected in Indiana as a result of climate change. When landscapes are saturated, frozen, or covered with impervious surfaces, high precipitation will force runoff to overflow stream channels causing **floods**. The effects of Eagle Creek floods will be increased by the new stormwater runoff from commercial development if the Traders Point site is rezoned.

Eagle Creek reservoir is primarily a **flood-control reservoir** that retains flood water to protect downstream communities in Speedway and Indianapolis. When the gates on the Eagle Creek dam have to be closed, flood water will raise upstream water levels affecting Eagle Creek Park, shoreline residences, and areas along Eagle Creek and its tributaries. There are indications that the water storage capacity of Eagle Creek reservoir may be diminishing, which also can increase flooding effects.

**Degraded water quality** from sediment in runoff during construction will combine with chemical pollutants in parking lot and roadway runoff harming fish and wildlife in downstream waters, including Eagle Creek reservoir. The potential for stimulating more harmful algal blooms deserves serious attention because of adverse effects on drinking water and recreation. The potential for hidden soil and subsurface **contaminants** from a former military armor museum on the south end of the site apparently has not been investigated. Surface water and groundwater could be affected.

**IF** the Traders Point site is rezoned, the commercial development will require City and State departments of transportation to build two new roundabouts, extra turn lanes, bridge upgrades, and improvements to Marsh Rd to sustain new truck traffic. Tax dollars, not developer dollars, are required to fund all these associated upgrades. Unlike a commercial development, traffic associated with the current zoning requires less extensive road and intersection improvements.

The numerous **empty office and commercial spaces** a short distance east of the rezoning site are ample evidence that demand and need for more of them is not realistic. Traders Point shopping plaza has large unoccupied stores and large unbuilt spaces. Park 100 and its neighbors have vacant buildings and For Lease signs in many places. Yet office and commercial space are the prevalent uses proposed for the development on the rezoning site.

The current residential and agricultural zoning on the site supports **sustainable** water and natural resource use that maintain a desirable quality of life for Traders Point taxpayers and voters. Traders Point still has successful working farms, which proves the point. Residences consistent with the nearby Traders Point neighborhoods could be built if the site were not rezoned and land prices were equitable. Family homes are reliable sources of property and income tax revenue for the community. They are consistent with existing neighborhoods west of I-465

The Indianapolis Metropolitan Development Council approved the rezoning request August 16, but it still needs to be approved or rejected by the Indianapolis City-County Council.

**I urge you to stand with the Eagle Creek Forest, stand with the local residents and neighborhood associations, and call down and reject commercial rezoning on case 2023-CZN-814.**