

# "Exhibit C"



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**Via Email:** [daschleman@noblesville.in.us](mailto:daschleman@noblesville.in.us)

Denise Aschleman, AICP, CFM; Principal Planner  
Planning and Development Department, City of Noblesville

**RE: Public Comments of the Hoosier Environmental Council on the Proposed  
Petition for Rezone and Mixed-Use Development for Morse Village, LEGP  
000192-2024, LEGP-000208-2024**

Ms. Aschleman,

Please accept these brief public comments on behalf of the Hoosier Environmental Council (HEC) regarding the proposed petition to rezone land and create the mixed-use development known as Morse Village. **HEC respectfully requests the City of Noblesville continue or deny the proposed petition until the following concerns are addressed.**

**HEC is concerned that the Morse Village proposal does not align with key outcomes in Noblesville's Comprehensive Plan such as smart growth and small-town charm and may adversely affect wildlife habitat, biodiversity, and water quality. For these reasons, HEC urges the City of Noblesville to require the developer to complete a survey for endangered, rare, or threatened species due to the wildlife habitat quality and pursue a smart growth solution such as conservation development and increased community engagement.**

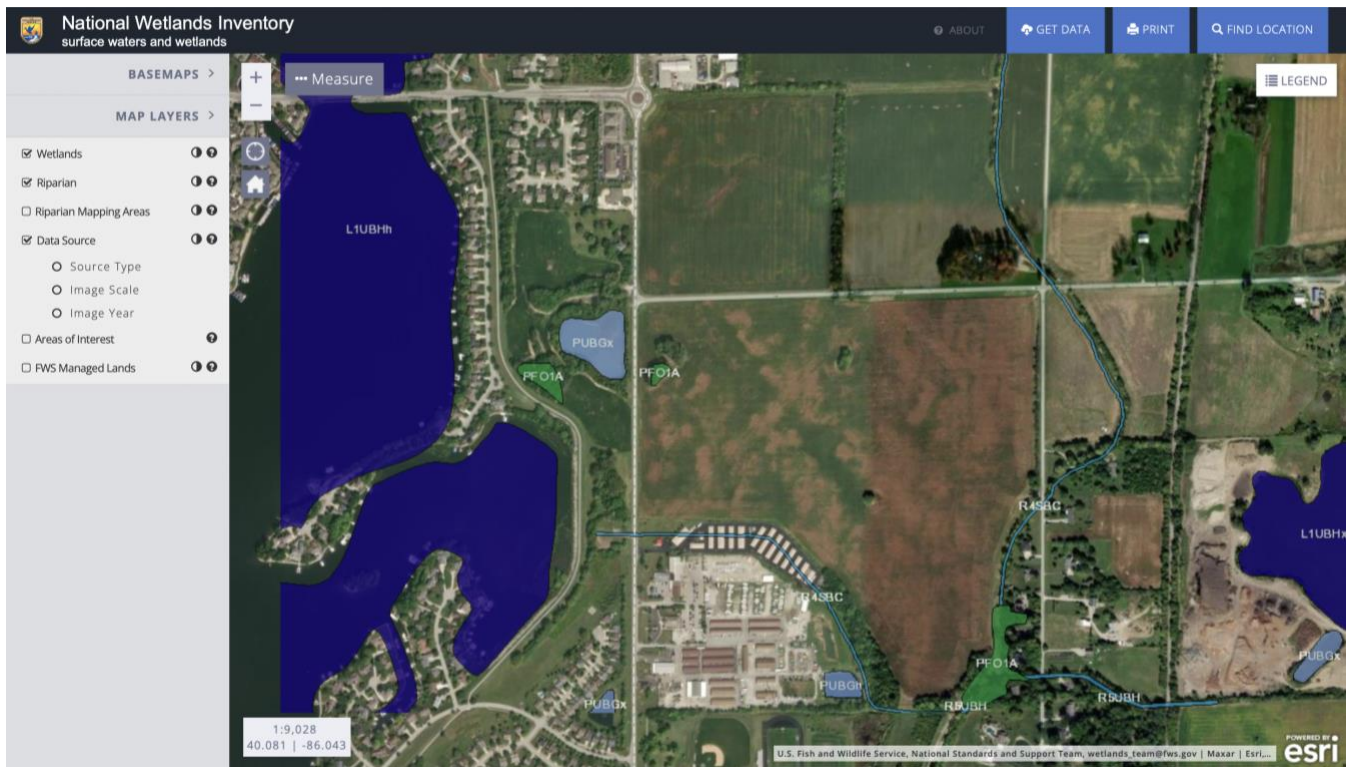
HEC also supports the community request for a continuance so that all parties and community stakeholders have an adequate and appropriate amount of time to review the wealth of information contained in the development proposal.

## **ABOUT HEC**

Founded in 1983 as an Indiana not-for-profit organization, HEC works towards a healthy environment and sustainable economy for our state. To that end, one of HEC's core environmental initiatives is to track land use changes in the state of Indiana to promote the responsible development of our natural resources. The Morse Village development will encroach on natural resources such as wetlands, agricultural land, forested areas, and floodways. Therefore, the proposed petition is of interest to HEC.

## CONCERNS

**Natural resources and adherence to the Noblesville Comprehensive Plan.** Morse Village is uniquely situated between two floodways – Morse Reservoir and Mallery Granger Ditch, and the development area consists of agricultural land containing two forested wetlands, an open pond with a forested edge, and a large, forested wetland southeast of the development associated with Mallery Granger Ditch (Figure 1).



**Figure 1.** Approximate location of National Wetland Inventory (NWI) Mapped Wetlands at Morse Village. Image by NWI Wetlands Mapper, US Fish and Wildlife Service, <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>.

These wetlands, floodways, and agricultural land are the natural features and environmentally sensitive areas of the proposed Morse Village Development. **One of HEC's concerns is that the Morse Village development does not align with key outcomes outlined in the Noblesville Comprehensive Plan.**

For example, two key outcomes of the plan include **smart growth** and **small-town charm**, both of which place an **emphasis on "accommodating development...while preserving and protecting the community's natural features and environmentally sensitive areas,"** and

**embracing, enhancing, and celebrating Noblesville’s “relaxed, genuine, unassuming, serene environment.”<sup>1</sup>**

The approval of this rezone and development will facilitate a sprawling suburban and commercial development, which are **textbook examples of unsustainable development if not considered in the context of many other factors such as community interest and natural resources**, which is the case here. For this reason, HEC proposes the following questions:

- **How does the Morse Village development preserve and protect the community’s natural features and environmentally sensitive areas?**
- **How does the Morse Village development celebrate Noblesville’s relaxed, genuine, unassuming, and serene environment?**

These are key questions that must be considered before the approval of this development. Mixed use development proposals, such as Morse Village, are attractive approaches that can and do make communities more livable, but if they aren’t considered in the context of other key components, they fail to deliver on multiple fronts.

Indeed, in the Morse Village Narrative Statement submitted by the developers, the overall vision and adherence to community standards is outlined, painting a picture of a vibrant community development. Notably missing from the narrative statement, though, is any mention of how the developer plans to prioritize or incorporate the community’s natural areas and environmentally sensitive features.<sup>2</sup>

While the City of Noblesville lacks a policy on smart growth, it is clear from the statement<sup>3</sup> in the comprehensive plan that Noblesville seeks to strike a balance between development and conservation. Smart growth refers to a set of planning principles and policies used by planners to ensure that new developments are sustainable and equitable for everyone, **with an emphasis on reducing the extent of urban sprawl and instead focusing development on core areas to create walkable and transit-oriented communities, while protecting natural resources**. In the absence of a Smart Growth policy within the City of Noblesville, we can look towards sound science and credible resources. Chief among them is the American Planning Association’s Policy Guide on Smart Growth, a critical tool in guiding smart growth policy in the United States, which outlines core principles of smart growth.

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<sup>1</sup> Page 23, Noblesville Comprehensive Plan.

[https://www.noblesville.in.gov/egov/documents/1582723614\\_08048.pdf](https://www.noblesville.in.gov/egov/documents/1582723614_08048.pdf).

<sup>2</sup> Page 1-2, Morse Village Narrative Statement.

<sup>3</sup> “Smart Growth: Accommodate the types (and mix) of land use activities and development types that have the ability to sustain and grow the City’s tax base, while preserving and protecting the community’s natural features and environmentally sensitive areas.”

## Core principles of Smart Growth include:

- 1. Efficient use of land and infrastructure**
2. Creation and/or enhancement of economic value
3. A greater mix of uses and housing choices
4. Neighborhoods and communities focused around human-scale, mixed-use centers
5. A balanced, multi-modal transportation system providing increased transportation choice
- 6. Conservation and enhancement of environmental and cultural resources**
- 7. Preservation or creation of a sense of place**
- 8. Increased citizen participation in all aspects of the planning process and at every level of government**
9. Vibrant center city life
10. Vital small towns and rural areas
- 11. A multi-disciplinary and inclusionary process to accomplish smart growth**
12. Planning processes and regulations at multiple levels that promote diversity and equity
- 13. Regional view of community, economy and ecological sustainability**
- 14. Recognition that institutions, governments, businesses and individuals require a concept of cooperation to support smart growth**
- 15. Local, state, and federal policies and programs that support urban investment, compact development and land conservation**
- 16. Well defined community edges, such as agricultural greenbelts, wildlife corridors or greenways permanently preserved as farmland or open space.<sup>4</sup>**

These principles provide important insights that could help determine whether Morse Village fits within a smart growth approach, and where economic resources should be invested when it comes to developing on Noblesville's important natural resources.

**Wetland loss and importance.** The state of Indiana has lost over 85 percent of its original wetlands and has some of the worst water quality in the nation.<sup>5</sup> This is an unfortunate condition in state blessed with abundant water ecosystems like swamps, marshes, fens, bogs, lakes, rivers, and babbling brooks and streams. Wetlands serve as critical natural infrastructure that protects us from flooding and are intricately linked to water quality, aiding in purifying both surface and groundwater. They play a disproportionately large role in supporting biodiversity but remain as some of the most threatened ecosystems worldwide.

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<sup>4</sup> American Planning Association Policy Guide on Smart Growth, APA.  
<https://www.planning.org/policy/guides/adopted/smartgrowth.htm>.

<sup>5</sup> The Clean Water Act at 50: Promises Half Kept at the Half-Century Mark, Environmental Integrity Project (2022).  
<https://environmentalintegrity.org/wp-content/uploads/2022/03/CWA@50-report-EMBARGOED-3.17.22.pdf>.

From the development plans, the Morse Village proposal will directly and indirectly impact wetlands, which can have a negative impact on water quality, wildlife habitat, and biodiversity. According to the Indiana Department of Environmental Management (IDEM) database of impaired waterways, Morse Reservoir is listed as impaired, while Mallery Granger Ditch is listed as unimpaired,<sup>6</sup> presenting a dual need to improve and maintain water quality in the region.

**Wildlife and biodiversity.** HEC has been made aware that this proposed development site is home to a wide array of wildlife, documented by the residents that live there, some of which have resided in the area for decades and can attest to the variety of species they get to enjoy on their daily walks. Wildlife plays a fundamental role in maintaining the balance and health of our ecosystems. Every species, from predator to prey, contributes to the regulation of natural processes that sustain biodiversity. Biodiversity is the variety of living species on Earth, including plants, animals, bacteria, and fungi. **Maintaining biodiversity is important because it can protect us from environmental problems like water pollution and provide us with food, fiber, medicine, resources, and enjoyment.**

Neighbors have seen bald eagle nests on the development area, and have observed them utilizing the agricultural land, indicating it is serving as critical habitat. The presence of animals like bald eagles indicates the presence of a high-quality ecosystem. Bald eagles fill an ecological role and provide benefits to humans in many ways. For example, they consume dead animals' matter and hunt rodents, helping nature's clean-up process and balancing rodent populations.

Other species present in the area are include herons, egrets, cardinals, doves, woodpeckers, bluebirds, blue jays, owls, opossum, coyotes, skunk, deer, fox, and turtles, providing just a snapshot of the wildlife that resides there. Some of these species, such as herons, indicate the presence of a robust aquatic and wetland environment because they act as top predators, regulating populations of fish, amphibians, and other small animals by preying on them. Additionally, many of the observed species serve as seed dispersers, which maintains plant diversity and supports the overall health of surrounding ecosystems. **For these reasons, HEC urges the City of Noblesville to require the developer to complete a survey for endangered, rare, or threatened species due to the wildlife habitat quality.**

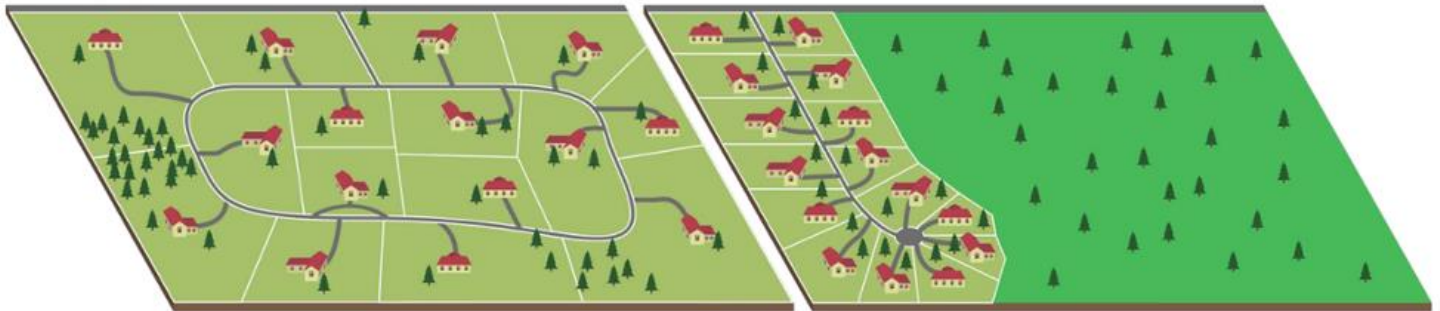
## SOLUTIONS

**Conservation Development.** Smart growth includes nature-based solutions, green infrastructure, and conservation developments. To balance development and conservation, the developer and the City of Noblesville should seriously consider pursuing a conversation development approach given both the community interest and environmental legacy this development will have.

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<sup>6</sup> IDEM 303(d) Tool, <https://www.in.gov/idem/nps/online-e303d-tool/>.

A conservation development approach is a type of development in which a percentage of land is protected from development. This approach (Figure 2) would prioritize the protection of the highest quality natural features and dedicate a total percentage (typically at least 50 percent), while also ensuring that the natural features are not fragmented from one another but instead rooted in connectivity.



**Figure 2.** A conceptual example of conservation development, in which lots are grouped to a certain area, while conserving a large portion of the land's natural resources.

The proposed Morse Village, while a mixed-used development, still utilizes a traditional development approach that is land consumptive, and makes minimal sacrifices with regards to natural resources, leading to a reduction in water quality, wildlife and biodiversity, and places limitations on the overall beauty and quality of natural areas within the development.

Of particular concern to citizens is the development on the west side of Hauge Road which will encroach on two wetlands and build on an area frequented by wildlife (Figure 3). Given that this area has the highest density of wetlands and is near Party Cove, which is a shallow marsh area along Morse Reservoir, protecting it entirely from development and utilizing it as a park or open space should be a top priority for immediately improving the overall natural beauty of the development and balancing the concerns between communities and developers carefully. Ensuring that the natural areas that are protected within the footprint of the Morse Village development are connected to each other is critical for wildlife dispersal and improving the overall ecosystem quality.

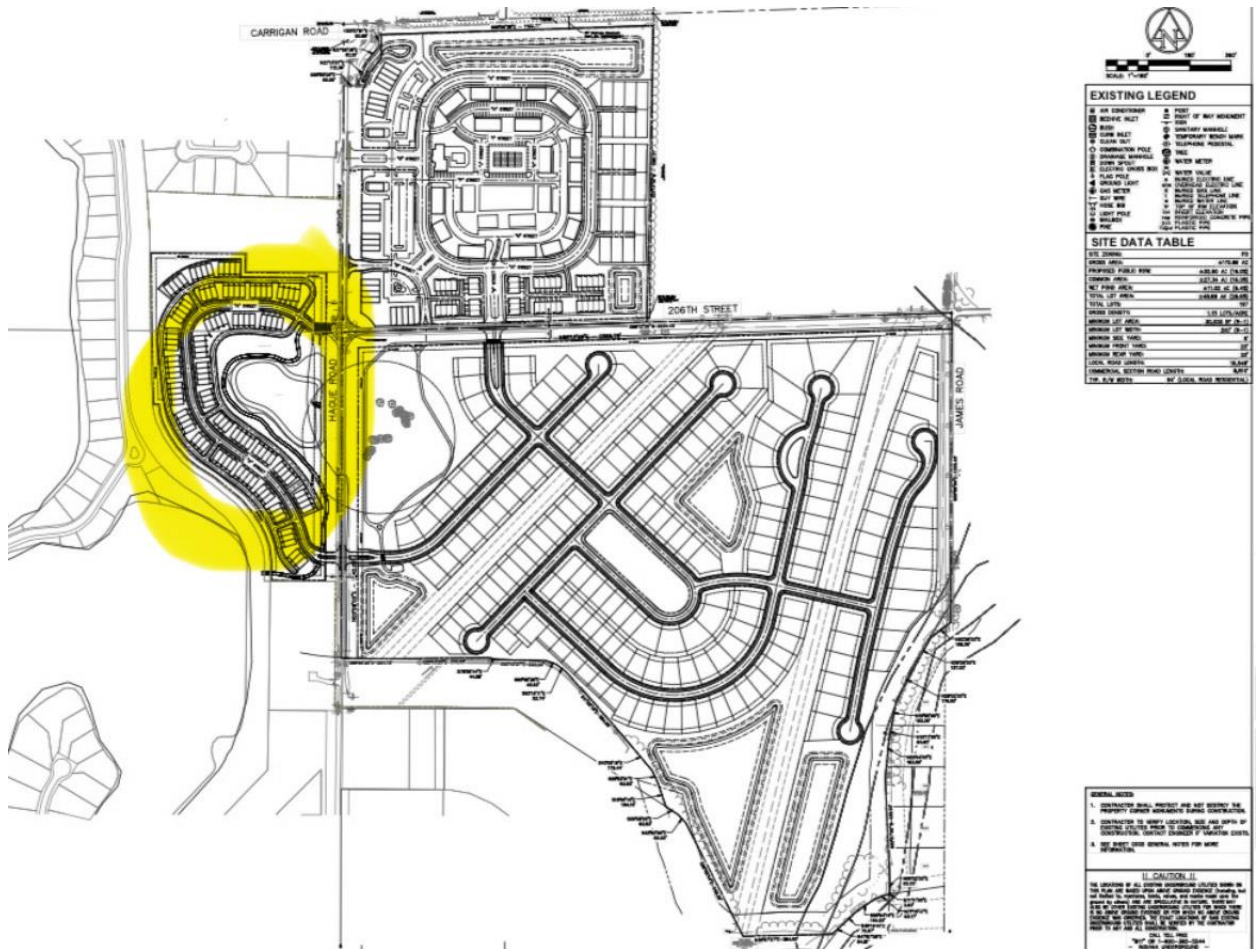


Figure 3. Area of concern highlighted in yellow.

## CONCLUSION

HEC does not aim to prevent development, rather, we work to encourage responsible and sustainable development that ensures the long-term economic, environmental and social health of our communities. HEC is concerned that the Morse Village proposal does not align with key outcomes in Noblesville’s Comprehensive Plan such as smart growth and small-town charm and may adversely affect wildlife habitat, biodiversity, and water quality. We encourage the completion of an endangered, rare, or threatened species and the utilization of smart growth solutions to address those concerns.

Pursuing a smart growth solution such as conservation development can help balance economic sustainability with the protection of critical natural resources, addressing both community and environmental concerns. This approach would ensure that new developments thrive while also preserving the integrity of our natural assets for present and future generations.

Additionally, increasing community engagement is also a smart growth solution, therefore, HEC recommends a continuance or denial of the current petition until it strikes a balance between development and conservation.

We hope that these public comments are useful and open a dialogue for further discussion on how to move forward to create a development that is fit for the economy, the environment and the community. Thank you for considering HEC's concerns. We look forward to your response.

Sincerely,

A handwritten signature in black ink that reads "Susie McGovern". The signature is written in a cursive, flowing style.

Susie McGovern  
Water Science and Sustainability Specialist  
Hoosier Environmental Council