

From: Ted and Kathy Frick  
1812 S. Weimer Rd.  
Bloomington, IN 47403  
Date: March 14, 2024  
To: Bloomington Plan Commission  
Re: Proposed Summit District PUD-18-23 along South Weimer Road

We have lived at our residence at 1812 S. Weimer Rd. since 1977. In our Sept. 6, 2023, letter to the Plan Commission, we mainly focused on storm water run-off and flooding concerns, and less so on transportation issues. Now we focus on transportation issues. We are very familiar with current traffic patterns in our area. For us, there are 2 ways we can go by automobile to destinations beyond Weimer Rd. We can go north to the Bloomfield Rd. or south to Tapp Rd. **The Weimer Rd. corridor currently has *no through connections to the east or to the west on public right of ways, as indicated in Figure 1 below.*** The Summit District PUD would create a new eastbound connection of Sudbury Dr. to Adams St. However, any new connections on the west side of Weimer Rd. are blocked by Interstate 69.

### **Summit District PUD Transportation Issues**

The Summit District PUD is likely to create increased traffic congestion at 3 main choke points for outbound automobile traffic, especially during rush hours:

1. Weimer Rd. stop sign at Bloomfield Rd. Bloomfield Rd. traffic does not stop.
2. Weimer Rd. stop sign at Tapp Rd. Tapp Rd. traffic does not stop.
3. Adams St. at Allen St. Currently a 4-way stop.

See red circles 1, 2, and 3 in Fig. 1 below. The proposed Summit District PUD-18-23 would heavily impact traffic on Weimer Rd, as explained below, especially if many of the new people in the Summit District try to exit to the west via Sudbury Dr. and turn onto Weimer Rd. to get to Tapp Rd. or to W. 2<sup>nd</sup> St. (Bloomfield Rd.). The intersection of S. Adams St. and Tapp Rd. is now a roundabout, and unlikely to be a choke point (green circle 4 in Fig. 1).

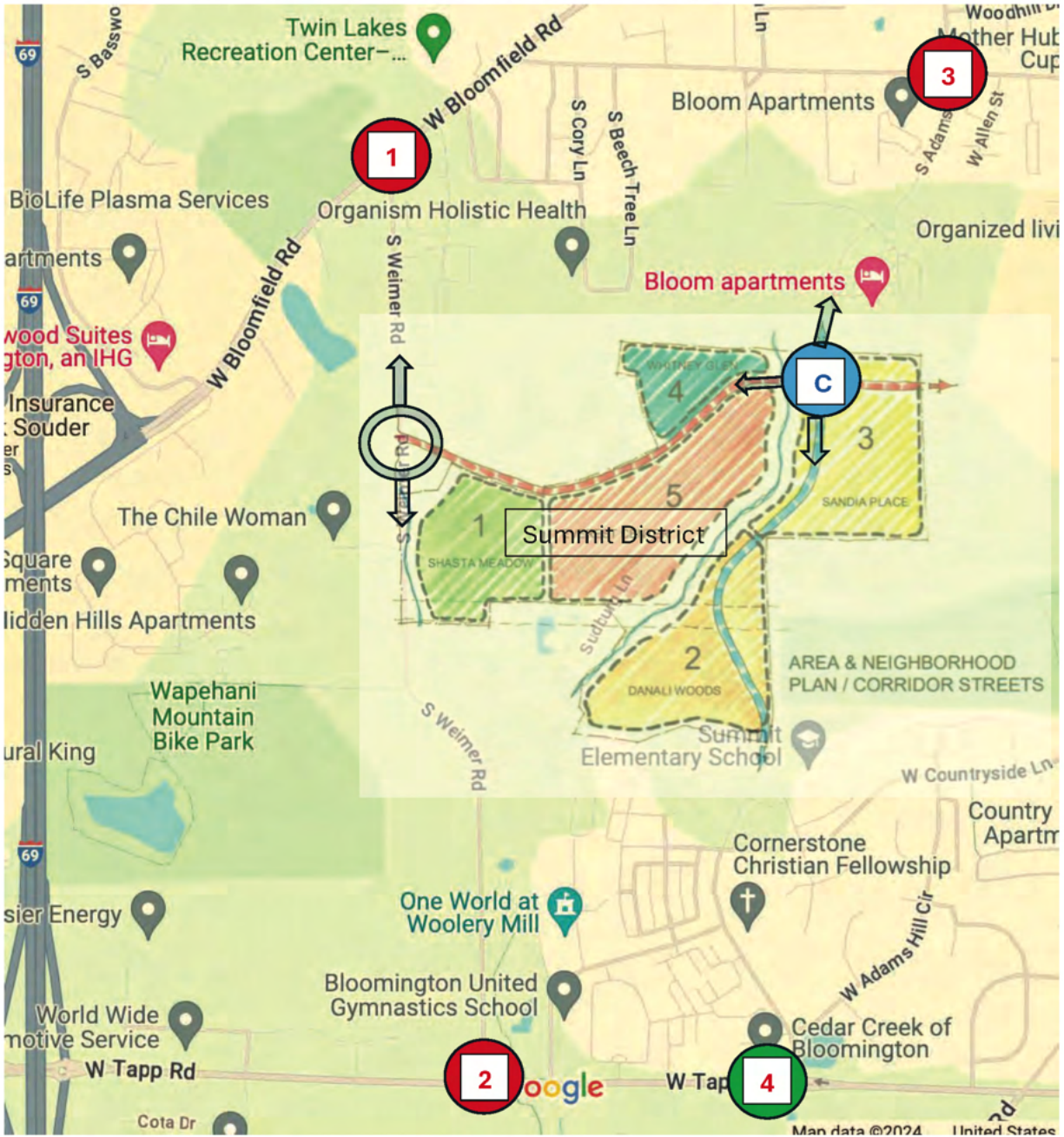
The total number of units was specified to be approximately 6,000 in the Summit PUD petition in July. At the Sept. 11 meeting of the Bloomington Plan Commission, the proposed number of units was less, possibly between 4,000 and 5,000. A further estimate has finally been provided *publicly* on March 13, less than a week before the next PC meeting on March 19, 2024. This latest estimate is 4,250 units total in the proposed Summit District PUD. When people are leaving for work, imagine the backed-up traffic at these choke points between 7 and 9 a.m. on weekdays! Likewise from 4 to 6 p.m. after work.

To put this in perspective, compare the city of Martinsville with the Summit PUD. Martinsville's population was 11,932 located on 5,862 acres, according to the 2020 U.S. Census. The Summit District PUD petition currently proposes 4,250 units, and assuming 2 adults per unit, this would be a population of about 8,500 adults in the 138.5-acre Summit District.

The main difference is their densities. Martinsville has 2 persons per acre, whereas Summit District would have 61 persons per acre. The density of Summit District is  $61/2 = 30.7$  times as

great as the city of Martinsville. While these are ballpark estimates, they do put things into perspective, as Table 1 shows. And this will impact traffic congestion, because currently there are only 4 main ways to get in or out of the Summit PUD area to nearby main arterials (Tapp Rd. and Bloomfield Rd.). Note that S. Adams intersects with W. 2<sup>nd</sup> St where there is currently a stoplight, which is north of the Adams and Allen St. intersection at circle 3.

Figure 1. Summit District PUD nearby streets. Red circles are anticipated choke points.



A 5<sup>th</sup> possible way was proposed in the Summit PUD by connecting Adams St. through privately owned land to Weimer Rd. at Wapehani Rd. While this would help decrease traffic congestion

within the Summit PUD, it does not alleviate the current choke points at the ends of Weimer Rd. See Table 1 below and Fig. 1 above.

Table 1. Comparing Martinsville to the proposed Summit PUD

	Martinsville (2020 Census)	Summit PUD (March 13, 2024)
Acres of land	~ 5,862	~ 138.5
Square miles of land	9.16	0.216
Population	11,932	~ 8,500 (4,250 units x 2 adults per unit)
Density of people per acre	$11,932/5,862 = 2$	$8,500/138.5 = 61$
How to get in or out: Main routes to arterials	??? but the routes are highly flexible to get to arterials	4 routes from the central point (blue circle): intersection at Adams St. and Sudbury Dr.***
Persons per main route to arterial	???	$8,500/4 = 2,125$ people on each of 4 main routes (average). During a 2-hour period, $2,125/120 \text{ min.} = 18$ people per minute at each circle in Fig. 1.

\*\*\*Summit District PUD main routes from central point (blue circle) at intersection of Adams St. and Sudbury Drive to Tapp Rd. and Bloomfield Rd. arterials (all 2-lane roads or streets). While not everyone will be traveling at the same time, nor will they divide themselves equally among the 4 routes, the averages nonetheless provide a general idea of the potential congestion at the 4 circled intersections.

**Other factors**

Weimer Rd. is a 2-lane road. There is a one-lane bridge on the south part of Weimer, and a sharp S-curve in the middle portion. Adams St. is also a 2-lane road. **Thus far, no eastbound through connection from Summit District to S. Rogers St. or to Rockport Rd. has been specified in the PUD.**

**Bottom line**

The current infrastructure of roads and streets surrounding the proposed Summit District PUD will be inadequate to handle significantly increased automobile traffic. We anticipate significant congestion at the 3 choke points (red circles in Fig. 1).

**Suggestions for decreasing congestion at choke points**

1. Build a roundabout or add a stoplight at each end of Weimer Rd. Widen narrow bridge on south end of Weimer Rd. *or* build new section of S. Weimer Rd. from Wapehani Rd. to Tapp Rd., so as to avoid the current S-curve and narrow bridge. The closed portion of southern old Weimer could then become an extension of the Clear Creek Trail.
2. Make Sudbury Dr. a through route from Weimer Rd. to S. Rogers St. with a stoplight or a roundabout at Sudbury and Rogers.
3. Change intersection of S. Adams St. and Allen St. to a two-way stop on Allen, with Adams not stopping; or build a roundabout at the intersection.
4. Decrease overall density of the Summit District PUD by a significant amount, so that much less traffic would be going from and coming to the Summit District.

*Ted + Kathy Frick*

To: City of Bloomington Plan Commission  
From: Arbor Ridge Homeowners Association Board of Directors  
RE: Sudbury Partners LLC Rezoning Request  
Date: July 28, 2023

Arbor Ridge is a 48-unit paired home community that will be significantly impacted by this rezoning proposal. This small community of 67 residents would see vastly greater financial and legal liability, increased light and noise pollution, reduced safety and security, and thus decreased property values, if this rezoning request is approved. Each of these concerns is explained in more detail in the following comments.

### **Financial and Legal Liability**

If Sudbury Drive is extended along the Arbor Ridge property line, as currently proposed, approximately 1000 feet of sidewalk will be added about one foot outside our property line and thus very near to about half of our 48 homes. We have heard that we might be held responsible for maintaining this sidewalk, though we have definitely not conceded this point.

If Arbor Ridge were forced to maintain this sidewalk, our cost of lawn care and snow and ice removal would almost double, which would increase our residents' HOA dues significantly. As a community of mostly retired senior citizens living on fixed incomes, our residents would be very negatively impacted by this increase.

Arbor Ridge HOA has been sued in the past by a pedestrian who fell on one of the sidewalks that runs through our community. Thus, we are also concerned about the potential legal ramifications of a pedestrian falling on this new stretch of sidewalk, especially if the area is rezoned to allow for commercial property near our community. We request that the residential zoning included in the PUD that was approved in 1999 be retained in order to limit our potential financial and legal liability.

### **Light and Noise Pollution**

If the extension of Sudbury Drive is lit with tall and bright streetlights, the light would shine directly into the back windows of about one third of our 48 homes, thus causing both privacy and health concerns due to sleep deprivation. We understand that the area would need to be lit, but we request that the streetlights be shorter, decorative street lights similar to the four streetlights that are currently in our neighborhood.

We are also concerned about the additional noise that would result from both foot and vehicle traffic associated with proposed commercial properties near our community. For this reason, as stated above, we request that all development near Arbor Ridge be residential and that the zoning approved in the 1999 PUD be retained without the requested changes.

**Reduced Safety and Security**

The rezoning request calls for commercial properties to be located next to our residential community, which we fear will lessen the safety and security we currently enjoy. For example, if one of these commercial properties were a restaurant with a bar that was open until late night or even early morning hours, we can easily imagine inebriated patrons wandering into our neighborhood and disturbing or even endangering residents.

Based on the PUD approved in 1999, we have always known that additional residential development was planned near our property; our concern is the adverse effect that nearby commercial property would have on the safety and security of our community of mostly retired senior citizens.

**Decreased Property Values**

Like all homeowners, Arbor Ridge residents work hard to keep our property in excellent condition and thus protect our property values. Visitors to our community often comment on how well-kept it is, even though the homes are between 15 and 19 years old.

Arbor Ridge homes usually sell quickly, often within a matter of days, with some buyers waiting for homes to become available. If the current rezoning proposal is approved, we fear that our property values will fall as a result of rising HOA dues made necessary by vastly greater financial and legal liability; increased light and noise pollution resulting from traffic and commercial property very near to our property line; and reduced safety and security due to commercial properties located near our community. For all of these reasons, we request that the Plan Commission deny this rezoning request and require changes that will address our concerns.

To: City of Bloomington Plan Commission  
From: Arbor Ridge Homeowners Association Board of Directors  
RE: Comments on Plan Commission Hearing of PUD-18-23 Sudbury Development Partners LLC, Sept. 11, 2023  
Date: August 22, 2023

Arbor Ridge is a 48-unit paired home community that will be significantly impacted by this rezoning proposal. We are especially concerned about the areas directly adjacent to our community. We appreciated the specific mention of the transition to Arbor Ridge in the Sudbury Development LLC's revised request for the August 14 Plan Commission meeting. However, we agree with the concerns City staff presented on p. 5 of the packet for that meeting:

3. The MN areas were amended slightly and an MX area was created. **The same question stands related to the appropriateness of such tall buildings and commercial east of the stream area, as well as immediately adjacent to Arbor Ridge** [bold text added].

4. The petitioner is proposing to require additional setbacks for buildings being built adjacent to Arbor Ridge or immediately across the street of Sudbury Drive. The Department is not convinced that the currently proposed R2 Standards (from the UDO) and five (5) foot step back will suffice for those properties immediately adjacent, as the building can be up to 7 stories in height in the MX district. Similarly, a step back of the building is proposed for the buildings across Sudbury Drive. However, the current proposal is a step back of ten (10) feet for buildings over 4 stories. **The maximum proposed height in that area is 12 stories with incentives** [bold text added].

### **Commercial Development Adjacent to Arbor Ridge**

As we stated in our comments for the August 14 packet, we are concerned about the additional noise that would result from both foot and vehicle traffic associated with proposed commercial properties adjacent to our community. In addition, we fear that commercial properties adjacent to our residential community will lessen our safety and security due to the danger of patrons from these commercial properties wandering into our neighborhood of mostly retired senior citizens.

We request that no mixed use or commercial development be located adjacent to any area of Arbor Ridge, which include the areas the developers have labeled Shasta Meadows, the rear area of Everest Center, and Whitney Glen.

We request that the Plan Commission deny this rezoning request and require changes that will allow only residential development adjacent to Arbor Ridge.



Jacqueline Scanlan &lt;scanlanj@bloomington.in.gov&gt;

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**Letter from Weimer Rd. resident with concerns about the Summit District PUD, for inclusion in Sept. 11 Plan Commission meeting packet**

2 messages

Ted Frick &lt;tedfrick@gmail.com&gt;

Wed, Sep 6, 2023 at 2:06 PM

To: planning@bloomington.in.gov, scanlanj@bloomington.in.gov, ron.smith@bloomington.in.gov

Cc: slsmith@smithdginc.com

To the Bloomington Plan Commission:

Please find attached our letter, for inclusion in the Plan Commission packet for the Mon. Sept. 11 meeting. This concerns the proposed Summit District PUD by Sudbury Development Partners LLC (who appear to be associated with The Ridge Group in Muncie, located at the same address).

My wife and I are long-time residents of Bloomington, and have lived at 1812 Weimer Rd. for the past 46 years. We attended the July and August Plan Commission via Zoom, and I have carefully read or scanned the documentation in the packets concerning the Summit District PUD.

We share our observations and concerns which are:

1. Potential flooding of Weimer Rd. and the Clear Creek flood plain from stormwater run-off, if proper mitigation is not in place.
2. Extreme traffic congestion on Weimer Rd. unless additional connecting roads are established, such as extending Sudbury Drive to Rogers, and completing S. Adams St. BEFORE construction begins on the Summit District PUD.

At least one of us plans to speak in the Monday meeting about our concerns during the public comment period. If the Plan Commission and staff read our letter in advance, then we can keep our comments brief in the meeting.

Thank you for your attention to this matter. Please acknowledge receipt.

--Ted Frick

p.s. I have cc'd Steve Smith here, mainly because we have quoted his excellent assessment of the Summit District PUD from the perspective of size, density, and traffic problems. His e-mail was included in the August packet.

**Summit District PUD letter on storm water mitigation and traffic congestion from Fricks.pdf**

649K

Jacqueline Scanlan &lt;scanlanj@bloomington.in.gov&gt;

Fri, Sep 8, 2023 at 12:56 PM

To: Ted Frick &lt;tedfrick@gmail.com&gt;

Cc: planning@bloomington.in.gov, ron.smith@bloomington.in.gov, slsmith@smithdginc.com

Received.

Thanks,  
Jackie Scanlan, AICP  
Development Services Manager

[Quoted text hidden]

From: Ted and Kathy Frick  
 1812 S. Weimer Rd.  
 Bloomington, IN 47403

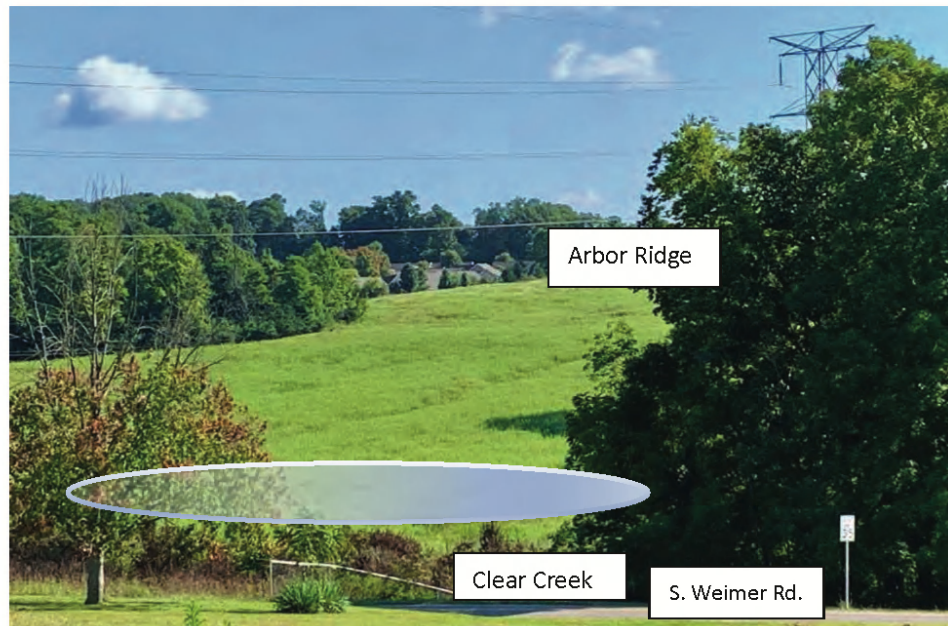
Date: September 6, 2023

To: Bloomington Plan Commission  
 Re: Proposed *Summit District PUD-18-23* along South Weimer Road

## Storm Water Mitigation Issues and a Proposed Solution

We have lived in our home at 1812 S. Weimer Rd. for 46 years now. We have witnessed a lot of change as the city of Bloomington has been expanding into this largely undeveloped area to the southwest. When we bought our house in 1977, there was a large, fenced pasture across Weimer Road, with cows grazing on the Sudbury farm. Harvey Sudbury and his family lived in his parent's farmhouse in the middle of roughly 300 acres, before they more recently built their new house along Weimer Road near Wapehani Road.

*Figure 1.* View of "Shasta Meadow" Hillside from 1812 Weimer Road. Photo by T. Frick, 9/03/2023. Possible location of proposed Weimer Retention Pond and text annotations are superimposed (also see Figure 2). Clear Creek is not visible here because of the steep slopes along the riparian buffer.



## Concerns about Flooding along Weimer Road

We have been looking out the windows of our house to the northeast at the increased erosion on the steep hillside for 5 decades. This hillside is now referred to as Shasta Meadow (Neighborhood #1) in the Summit District PUD proposal documentation from Plan Commission



meetings in July and August 2023. This western area along Weimer Road for Neighborhood #1 is mostly a hillside, and would be better named, Shasta Hillside. It will no longer be a meadow when covered with streets, buildings, sidewalks, driveways, and other parking areas.

We can easily tell how much it has rained recently—just by looking at how much surface water drains down the Shasta Hillside in the deepening ravines, and for how many hours the water drains.

That highly visible Shasta Hillside drainage down steep ravines is a good predictor of how much flooding there will be along Weimer Road to the north and south of our house, as well as flooding along the Clear Creek Trail south of Rockport Road. We don't even need to look at the overflowing banks of the Clear Creek branch that runs from the remaining Twin Lake through the valley along Weimer Road, and onward to the south along the Clear Creek Trail.

We've been watching this flooding problem get worse over the past several decades.

### **Water Flows Downhill**

The proposed Summit District PUD is aptly named, as is Summit Elementary School. They are on the highest ground, as is the summit of a mountain. Surface water flows downhill when it rains. The proposed PUD will *increase* impermeable surface area, meaning more flowing rainwater will not be slowed by vegetation and absorbed by soil that is no longer there. That top soil and vegetation will be replaced by buildings with impermeable roofs, by impermeable sidewalks and driveways, and by impermeable streets and parking areas. If the rainwater can no longer soak in, where will it flow to and how fast will it flow? If not regulated in some way, the result is highly predictable: flooding in lower areas which drain more slowly.

### **What is the Plan for Storm Water Mitigation?**

Our concern is how storm water mitigation will be handled in the new development being proposed in the Summit District PUD, something like 5,000 to 6,000 units in the present plans. This means there will be a substantial increase in the impermeable surfaces on what is now largely grassland and karst limestone. There will be many new rooftop surfaces, sidewalks, driveways, streets, and parking places that are not there now. This decreased permeability overall will undoubtedly increase the storm water runoff after rainstorms and snow melts. The questions are: Where will all this extra surface water go? And at what rate will it go downhill?

The big concern and fear is that flooding will become worse in the valley areas along Weimer Road. There could be not only flooding of yards and residences in the valley portion, but also the flooding and closure of Weimer Road itself at times.

After a particularly heavy rainstorm about 2 years ago, the south portion of Weimer Road at the narrow bridge was completely flooded and impassable for about 2 days. And north of us, water was flooding across Weimer Road where the two tributaries from the Twin Lake go through culverts under the road. These parts of Clear Creek are already designated as a flood plain area. That's an environmental fact. For those of us who live on the higher ground along the middle

part of S. Weimer Road, we were living on an island, land-locked for about a day. There was no other way out by automobile. We stayed home until the flooding receded. Meanwhile, we could see that our neighbors to the north had flooded yards, and we wondered if the floodwater had damaged their houses.

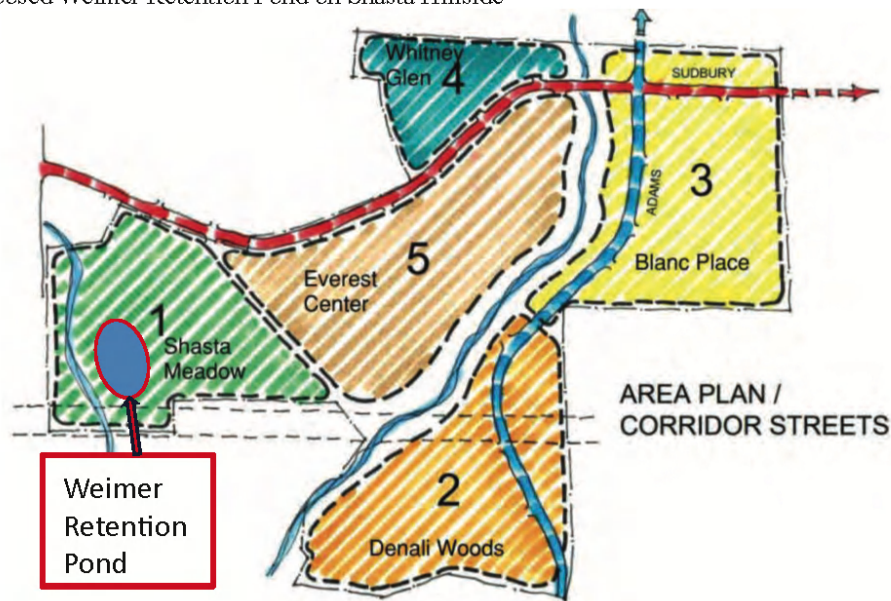
Therefore, we ask: How will storm water run-off be mitigated in the Summit District PUD?

**A Proposal: Weimer Retention Pond (Figure 2)**

One way to do this would be to build a storm-water retention pond along the bottom of the western hillside but above Clear Creek as part of the proposed Summit District PUD. Engineers would be able to figure out how big the pond should be, given the severe slope and the increased run-off from impermeable surfaces to be added in the development.

If designed carefully, the retention pond should *decrease* the amount of flooding along the Weimer-Road-Clear-Creek flood plain. If the Summit District PUD does provide this retention pond, it could actually reduce the overall flooding that currently occurs after heavy rainstorms. Instead of making the flooding problem worse, it could help decrease the flooding along Clear Creek and Weimer Road after heavy rains.

Figure 2. Proposed Weimer Retention Pond on Shasta Hillside<sup>1</sup>



While adding a retention pond for the development likely might decrease the available land area for buildings and streets in the Shasta Hill neighborhood, it could be also viewed as a major

<sup>1</sup> The retention pond would be placed and shaped by engineers to fit the contours of the land—unlikely to be an oval as depicted. The southwest corner of the Shasta Hillside is currently lowest in elevation in Neighborhood 1, but grading during construction and installation of storm-water sewers could dictate a different placement. Other factors to consider for pond location would include the necessary riparian buffer zone along Clear Creek, the Duke Energy easement, steepness of slope in that area, and subterranean karst limestone. The area plan was digitally copied from the staff report on the Summit District PUD that was included in the August 14, 2023, Bloomington Plan Commission meeting packet (Image One, p. 8). We have added the Weimer Retention Pond to this image, solely for purpose of illustration here. The retention pond was not part of Image One in the staff report.

aesthetic feature, making the development more attractive to prospective buyers. People in nearby units in the PUD would be looking out over a small pond to the west. People living across Weimer Road would have more peace of mind, even though they might be looking at an earthen dam to contain the retention pond on the western Shasta hillside. The proposed new Weimer Retention Pond on the lower southwest end of Shasta Hill also would serve as further wetlands for wildlife in the area.

To build up a suitable dam and sides for the Weimer Retention Pond, especially on the west and south sides, will presumably require additional soil and rocks. The developer could potentially save money by moving excavated soil and limestone from other parts of the development site to construct the retention pond on the severe western slope of Shasta Hill. This could help reduce the number of trips from the development site to an external location, as well as reduce wear and tear on local roads from big trucks heavily loaded with excavated soil and rocks.

There may very well be other parts of the Summit District PUD where significant storm water mitigation is needed, requiring additional retention ponds. If so, then soil and rocks excavated for construction could be moved within the PUD area, rather than trucking them to an external site.

The nearby Twin Lake along West 2<sup>nd</sup> Street is effectively a retention pond with an earthen dam, which regulates runoff into Clear Creek along Weimer Road. We also note the use of a nearby retention pond at the Tapp Road roundabout, where S. Adams Street terminates.

### **Other Solutions?**

There are other ways to control flooding besides retention ponds. If a retention pond is not a good solution, then Sudbury Developers of the Summit District PUD and city of Bloomington environmental engineers should specify similarly effective storm water runoff mitigators, or even better ones. We have yet to see a report from the Bloomington Environmental Commission concerning the Summit District PUD.

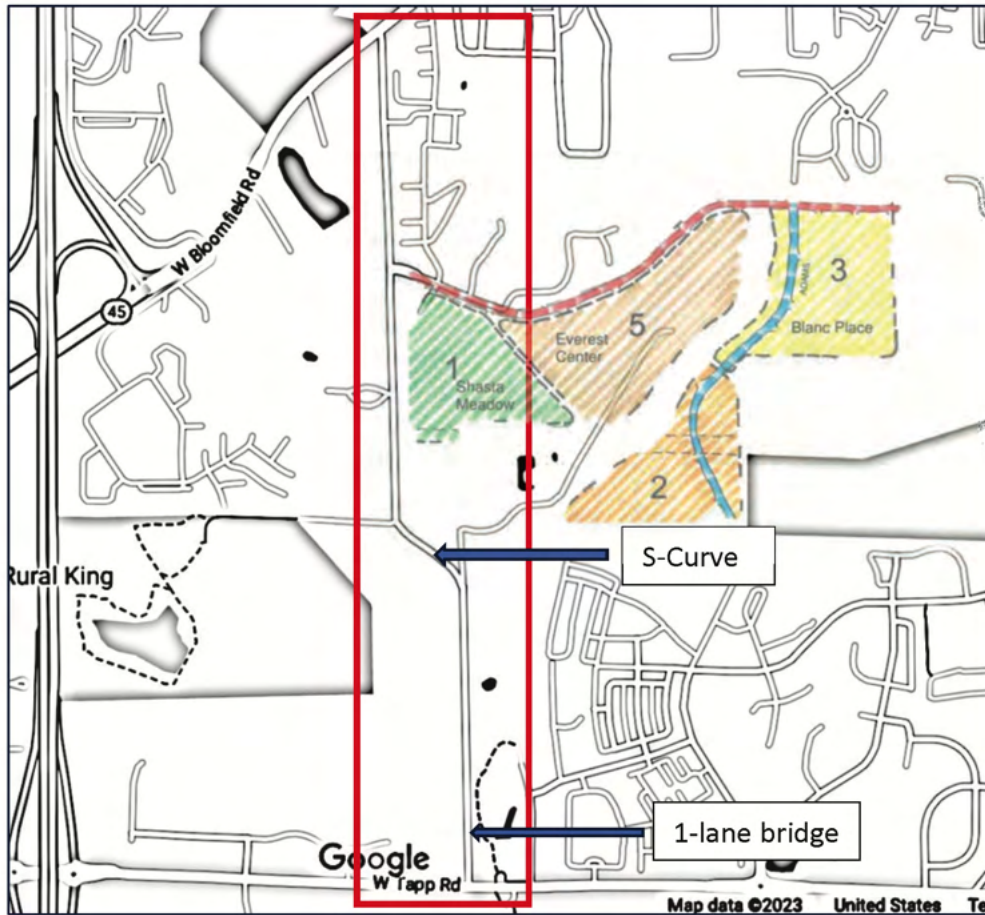
### **Extending the Clear Creek Trail**

Imagine also the Clear Creek Trail extending north from Tapp Road along Clear Creek and eventually connecting to the new city trail that is proposed to run east-west along the utility easement from Rogers Street (at the Switchyard Park) to Weimer Road. The new Weimer Pond could even be visible from the trail, if designed properly.

### **Traffic Congestion Issues**

The Summit District PUD proposal to build 5,000 to 6,000 units on about 140 acres will result in population density that is very high for the city of Bloomington context. The Bloomington Plan Commission packet for the August 14, 2023, meeting contained a significant e-mail message from Steve Smith, an engineer and surveyor who has been around Bloomington a long time and witnessed many different kinds of development.

Figure 3. Weimer Road corridor (outlined in red, about 1.5 miles long)



Smith’s e-mail points out several facts which put the Summit District PUD proposal into perspective. He referred to the Sudbury PUD, which is technically the Summit District PUD petition, and was also referring to the information presented in the July 2023 meeting of the Plan Commission. He compared the Summit District PUD to a recent development in Bloomington: the apartments built on the old K-mart site on the east side of Bloomington, along 3<sup>rd</sup> Street, and behind Bloomingfoods grocery.

We quote from his e-mail on pp. 115-16 in the Plan Commission packet for the August 14, 2023, meeting:

“By my calculations the proposed [Summit District] PUD is about 1.5 to 2.0 times the density of the K-mart multifamily site and about eight times larger in area....

The K-mart site has 340 units on about 12 acres for 28 units per acre. The K-mart site plan is efficient with no land lost to environmental features, thoroughfares etc. The 140 acre [Summit District] site will lose about 40 acres to environmental features and through

roadways leaving about 100 acres for development. The density of the developed area will be between 44 and 60 units per acre. This is about 1.5 to 2.1 times denser than the K-mart site.

- [Summit District] is 1.57 to 2.14 times as dense as K-mart
- [Summit District] would be equal to 8 K-marts based on acreage
- [Summit District] would be equal to 13 to 17 K-marts based on number of units

Traffic was mentioned at the hearing [in July] and apparently a traffic study will be done. Rough projections are about 6 trips per day for each multifamily unit. Assuming a maximum of 6,000 units results in 36,000 newly generated trips per day. A two-lane road like Weimer or Adams typically can accommodate 3,000 to 5,000 ADT at a reasonable level of service. This doesn't account for the issues that those roads currently have.

The K-mart site with 340 units fronts on a State Highway with two signalized intersections and reasonable cross connections via Clarizz and entry to the College Mall. K-mart will largely serve students whose destination is a direct bus ride away. [Summit District], at 13 to 17 times the number of units, has access via 2 lane Weimer and Adams and is not close to the University or employers.

**Traffic will be a problem.”**

Smith's e-mail is speaking largely to the Plan Commission (and potentially the City Council, if the petition is forwarded). And to engineers and city planners who routinely review these kinds of development petitions.

We Weimer Road residents experience the traffic issues on Weimer Road almost every day, especially the backups at the Bloomfield Road and Tapp Road intersections when lots of folks are trying to go to work or come home from work. We know how bad the congestion can get at those two ends of S. Weimer Road, especially when there is a lot of traffic. We witnessed significant backups, especially when I-69 intersections were constructed at Tapp Road and West 2<sup>nd</sup> Street.

**In addition to safety issues, the big impact on us Weimer Road and Arbor Ridge residents would be significant delays and congestion when trying to leave our neighborhoods. The brutal fact is that we currently have only two ways to go. There are no alternatives by driving on public streets and roads. Because there are no current alternatives.**

We also wonder who would want to live in apartments and condos in the Summit District, when there are significant traffic congestion problems if not adequately addressed? We don't know who those people will be, but why would anyone want to live in a neighborhood where it might take 15 minutes just to get from home to a major thoroughfare such as the Bloomfield Rd. or Tapp Rd. which is less than a mile away? Not only would that affect current residents on Weimer Road, Arbor Ridge, and Millennium Apartments, but also new residents in the Summit District.

Traffic currently backs up at both ends of Weimer Road when there are more cars. Steve Smith estimates about 36,000 new trips for day from the proposed 6,000-unit Summit District PUD, and that a 2-lane road such as Weimer can handle 3,000 to 5,000 average daily trips. This would mean about 7 to 10 times more traffic on Weimer Road, which currently has a S-curve on a hill with poor visibility of oncoming traffic, a one-lane bridge, and stop signs at Tapp Road and the Bloomfield Road which are busy thoroughfares with traffic that does not stop.

We hope that rational people will prevail when considering the Summit District PUD petition. We expect that the Summit District petition will be denied unless the petitioner can provide a feasible solution to the traffic congestion problem that will be created. We also expect the petition will be denied unless the significant environmental issues are addressed adequately—especially stormwater run-off and flooding along Weimer Road and Clear Creek.

Reports from the Bloomington Environmental Commission and the Transportation Department on the proposed PUD are essential for planning this PUD.

### **Let's All Work Together to Make This Work**

Let's make this a win-win-win-win for current residents along Weimer Road, Sudbury Development Partners LLC (The Ridge Group from Muncie), Arbor Ridge residents, and the City of Bloomington.

Sincerely,



Ted and Kathy Frick

Mark and J. Vivian Furnish  
 1600 S. Weimer Rd  
 Bloomington, IN 47403

Aug 9, 2023

**Letter to the City of Bloomington Plan Commission Regarding PUD-18-23**

*To be included in the meeting packet of the scheduled meeting on Aug 14, 2023*

We are writing to request the Plan Commission to not approve (or approve with conditions) PUD-18-23. We also request the Plan Commission to not forward any favorable recommendation of PUD-18-23 to the Common Council.

If the Plan Commission elects to allow further hearings, we request the following prior to subsequent hearings:

- 1) an environmental impact study, including a state-of-the-art multi-phase study on karsts, including subterranean / subsurface karst features, be conducted and made available to the public,
- 2) an updated environmental resource inventory (COBERI) be conducted by the City of Bloomington to account for changes in the environment since the publication of the last COBERI report (November 2003) to the area under Summit District PUD, the Clear Creek Drainage System and the larger Bloomington area,
- 3) and all environmental investigations that the Bloomington Environmental Commission (EC) of the City of Bloomington deems necessary, because “the size of this site alone necessitates the very best environmental protections” (Memorandum on PUD-18-23, July 10, 2023; Page 97 of the July 10 meeting packet).

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References	Link
Plan Commission, Meeting Packet, July 10, 2023	<a href="https://bloomington.in.gov/onboard/meetingFiles/download?meetingFile_id=12163">https://bloomington.in.gov/onboard/meetingFiles/download?meetingFile_id=12163</a>
City of Bloomington Environmental Resource Inventory report (COBERI), November 2003	<a href="https://bloomington.in.gov/sites/default/files/2017-07/City%20of%20Bloomington%20Environmental%20Resource%20Inventory%20%28COBERI%29%20%282003%29.pdf">https://bloomington.in.gov/sites/default/files/2017-07/City%20of%20Bloomington%20Environmental%20Resource%20Inventory%20%28COBERI%29%20%282003%29.pdf</a>
City of Bloomington Environmental Resource Inventory report (COBERI), November 2003	<a href="https://bloomington.in.gov/sites/default/files/2017-07/City%20of%20Bloomington%20Environmental%20Resource%20Inventory%20%28COBERI%29%20%282003%29.pdf">https://bloomington.in.gov/sites/default/files/2017-07/City%20of%20Bloomington%20Environmental%20Resource%20Inventory%20%28COBERI%29%20%282003%29.pdf</a>
2018 Comprehensive Plan City of Bloomington	<a href="https://bloomington.in.gov/sites/default/files/2018-04/Final%20Council%20Amended%20CMP%20%20Web%202.pdf">https://bloomington.in.gov/sites/default/files/2018-04/Final%20Council%20Amended%20CMP%20%20Web%202.pdf</a>
City of Bloomington Unified Development Ordinance (Last Amended Date: April 20, 2023)	<a href="https://bloomington.in.gov/sites/default/files/2023-05/UDO%20April_2023_Final_APPROVED_0.pdf">https://bloomington.in.gov/sites/default/files/2023-05/UDO%20April_2023_Final_APPROVED_0.pdf</a>
Indiana's 2022 303(d) List of Impaired Waters, IDEM	<a href="https://www.in.gov/idem/nps/watershed-assessment/water-quality-assessments-and-reporting/section-303d-list-of-impaired-waters/">https://www.in.gov/idem/nps/watershed-assessment/water-quality-assessments-and-reporting/section-303d-list-of-impaired-waters/</a>
Section 303(d) Frequently Asked Questions, IDEM	<a href="https://www.in.gov/idem/nps/watershed-assessment/water-quality-assessments-and-reporting/section-303d-list-of-impaired-waters/section-303d-frequently-asked-questions/">https://www.in.gov/idem/nps/watershed-assessment/water-quality-assessments-and-reporting/section-303d-list-of-impaired-waters/section-303d-frequently-asked-questions/</a>
Total Maximum Daily Load Reports, IDEM	<a href="https://www.in.gov/idem/nps/resources/total-maximum-daily-load-reports/">https://www.in.gov/idem/nps/resources/total-maximum-daily-load-reports/</a>
Proper Investigative Techniques in Karst, IDEM Technical Guidance Document, September 15, 2019	<a href="https://www.in.gov/idem/cleanups/files/remediation_tech_guidance_karst_memo.pdf">https://www.in.gov/idem/cleanups/files/remediation_tech_guidance_karst_memo.pdf</a>
City of Bloomington Parks and Recreation Department Master Plan 2021 – 2025	<a href="https://issuu.com/bloomingtonparks/docs/city_of_bloomington_indiana_bloomington_parks_and_">https://issuu.com/bloomingtonparks/docs/city_of_bloomington_indiana_bloomington_parks_and_</a>



## **I. Introduction**

A development of any size should be properly planned and managed in accordance with local, state and federal regulations; this we all agree upon, and we hope is what the City of Bloomington strives to do. The 138.51 acres of land in question is large in size and significant in biodiversity. As the EC has pointed out in its July 10 Memorandum to the Bloomington Plan Commission, “there are countless environmental features dotting the entire area, including mature tree stands, streams and riparian buffers, steep slopes, wetlands, sinkholes, and biodiversity”. Yet the Petitioner has requested “numerous environmental exceptions” in its current plan.

We, as concerned citizens, as people that have spoken with neighbors familiar with this piece of land and its surrounding environ, have performed a “paper exercise” to further understand the inherent environmental features of the area, and what state-of-the-art environmental protections it deserves. We are not experts on this topic. We cannot perform field studies or any study of that nature. But to better educate ourselves, we’ve summarized what we’ve learnt on the internet, and wish to share these findings, unanswered questions, and concerns with the Plan Commission and all who are interested.

In addition, we understand that the EC has provided a Memorandum to the Plan Commission on July 10 “as a place holder for the EC’s thorough discussion of this proposal” to be presented at the Aug 14 hearing. We look forward to the findings and discussion to be provided by the EC and support the EC to continue to hold the Petitioner accountable to the best environmental protections for this large section of land and its surrounding area, both now and in the future. Urbanization does not come without consequences. Its impact cannot simply be determined in the hypothetical, or in the short term, but by its long-term effect.

To understand the environmental features and their vulnerabilities, we first studied the City of Bloomington Environmental Resource Inventory (COBERI) Report (November 2003). The following sections (II to VII) include an overview of the report, and the features we consider worthy of note. We ended the letter with a Comparison with Brown’s Woods (VIII), and other concerns and closing summary (IX).

## **II. Overview of the City of Bloomington Environmental Resource Inventory (COBERI) Report (November 2003)**

The City of Bloomington Planning Department published an Environmental Resource Inventory report (COBERI) in November 2003, to “collect and analyze information on Bloomington’s natural environment in an effort to help prioritize areas for future management and/or preservation”. It is “part of a larger, on-going project that provides the factual foundation to further develop sustainable land-use and land development strategies for the City of Bloomington”.

The report states that "... preserving natural areas provides immeasurable benefits to society". Further, "the City of Bloomington's Growth Policies Plan (note, the 2002 version) recognizes the importance of preserving high quality natural areas and promotes the use of sound conservation planning principles".

A series of four (4) steps were used for the analysis in the COBERI project, including "identifying primary research categories, collecting data, performing quality control activities, and data analyses and interpretation". A total of seven (7) categories were identified, which were "soils, wetlands, floodplains and water resources, karst geology, topography, sensitive habitat and vegetative cover".

In addition, "the City of Bloomington's Planning Department evaluated and ranked natural areas in Bloomington using an environmentally sensitive areas (ESA) analysis" ... "to better understand their (i.e., natural resources) roles and functions they must be studied as an interconnected system".

The 2003 COBERI report is "the first step in identifying and prioritizing Bloomington's natural areas" to "preserve high quality natural areas in Bloomington in an effort to maintain the valuable ecosystem goods and services they provide".

Out of the seven categories identified, four of them are particularly present in the Summit District PUD, including sensitive soils (section III), wetland (section IV), flood plains and water resources (section V), and karst features (section VI).

### III. Soils

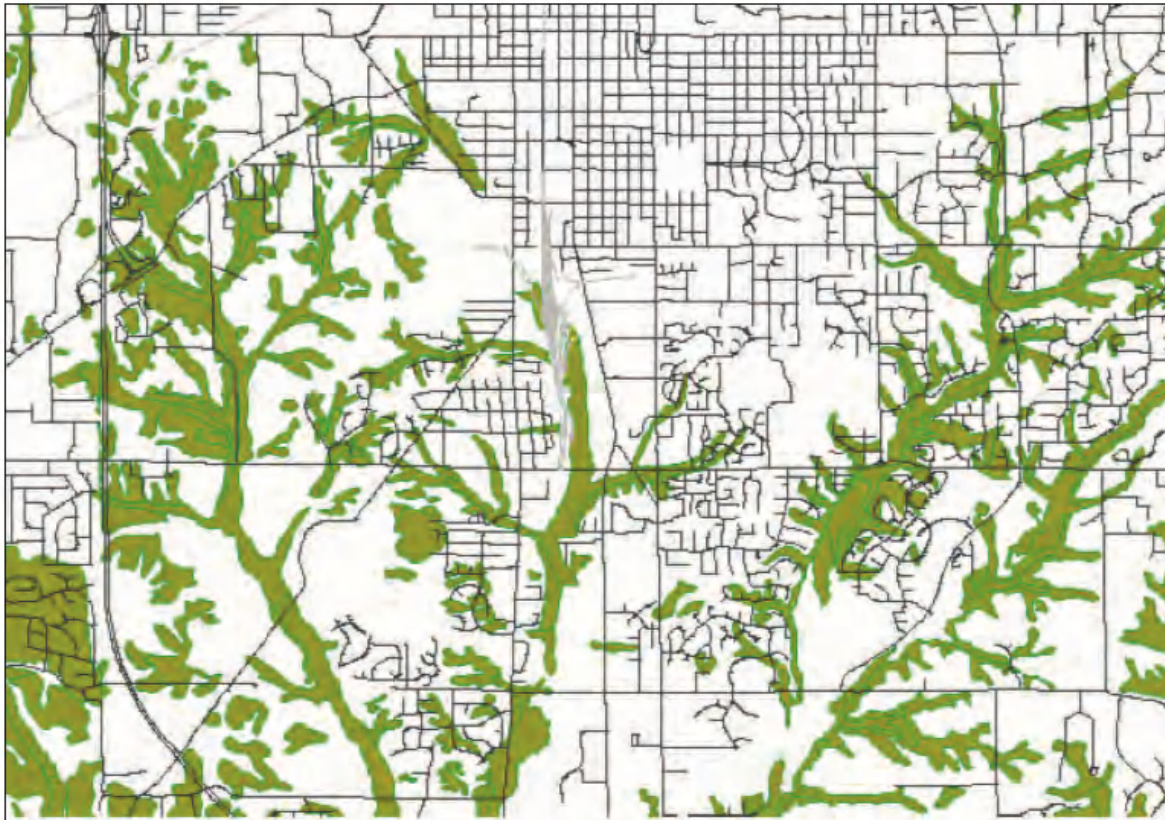
The COBERI report identified "sensitive soil" as "having the following 5 characteristics":

1. Poor for crops and pasture
2. Poor for woodland management and productivity
- 3. Poor for urban uses such as landscaping, building site development, sanitary facilities, construction materials, and water management**
4. Poor for intensive recreation development
5. Poor wildlife habitat potential

The report also states that,

Bloomington's sensitive soils had the following physical properties: high shrink swell potentials; poor permeability rates; susceptible to frost heave action; prone to flooding; and highly susceptible to mass wasting processes (based on National Resource Conservation Service's guidelines).

Figure 1 of the November 2003 COBERI report illustrates the sensitive soils in Bloomington and surrounding areas. Note that much of the 140 acres of Summit District PUD contains sensitive soils, which are “highly susceptible to mass wasting process”, i.e., erosion.



**FIGURE 1. Map of sensitive soils in Bloomington and surrounding areas**

The shaded areas above depict sensitive soils. In Bloomington, sensitive soils were generally found along steep slopes, ridges, floodplains and riparian corridors. Sensitive soils accounted for approximately 25% of Bloomington’s overall land area.

Has the Petitioner considered the sensitive soils present in this area in its planning? Given the age of the COBERI report, so much population growth, urban development and has occurred, and much green space has been lost since 2003. Have the sensitive soils areas grown since 2003? Have they become more prone to mass wasting process (erosion)?

The numerous exceptions to the UDO do not offer the assurance that the proposed use and development will be designed to minimize negative environmental impacts and not cause significant adverse impacts on the natural environment.

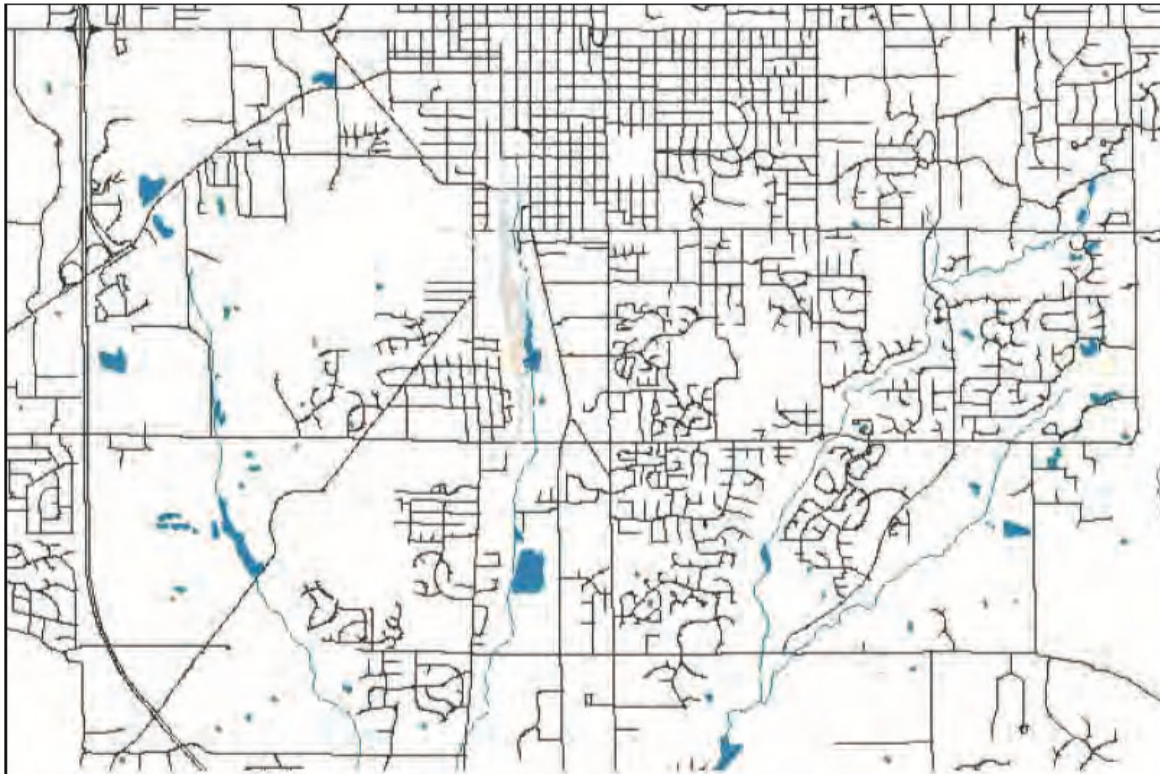
#### IV. Wetland

As stated in the 2003 COBERI report, wetlands “provide different types of ecological functions including critical habitat for wildlife, supplying water for recharge, controlling flooding and erosion, improving water quality, and offering recreational and educational opportunities”. “Depending on the type and extent of wetland, these critical habitats may be protected under federal, state and/or local laws.”

In addition, the report states that,

The successful maintenance and improvement of wetlands depends heavily on watershed management and planning activities. Due to their ecological importance and sensitivity to development, wetlands must be considered for preservation and management when determining land uses and growth patterns. Information for this category came mainly from the United States Fish and Wildlife Service’s National Wetland Inventory. Other sources included the United States Environmental Protection Agency and the City of Bloomington Planning Department.

Figure 2 of the November 2003 COBERI report illustrates potential wetland areas in Bloomington. In the area of the Summit District PUD, the creek and the former Lake Wapehani both are depicted in Figure 2.



**Figure 2. Map of wetland areas in Bloomington and surrounding areas**

The shaded areas above represent potential wetland areas. In Bloomington, the majority of wetlands were found near lakes, reservoirs or major creeks. Wetlands accounted for approximately 2% of Bloomington's overall land area.

We would like to point out that, following the removal of the earthen Weimer Dam at Lake Wapehani in 2018, “the lake bed” was to be “restored to a wetland” (City of Bloomington News Release, July 3, 2018). The health of this new “wetland” and its impact to the surrounding environment has not been studied, as far as our research reveals to us.

Much has changed in Bloomington since 2003; the data to be analyzed, i.e., the environment, the regulations, and best practices/golden standards have all changed. As the EC has pointed out, “climate, thus environmental, change has long term impacts on all residents and must be prioritized”. If the City wishes to make informed and sustainable decisions for its residents and the environment we dwell in, up-to-date information on the environment should be available to inform decision-making.

If the City of Bloomington has conducted further study following its 2003 COBERI project, which was considered “the first step in identifying and prioritizing Bloomington’s natural areas”, please make them available to the public. If the City of Bloomington is not able to allocate the needed staff and technology to continue the long-term monitoring they have promised to do in 2003, perhaps alternative budget allocation should be considered to truly “prioritize Bloomington’s natural areas” in actions, not just words.

## V. Flood plains and water resources

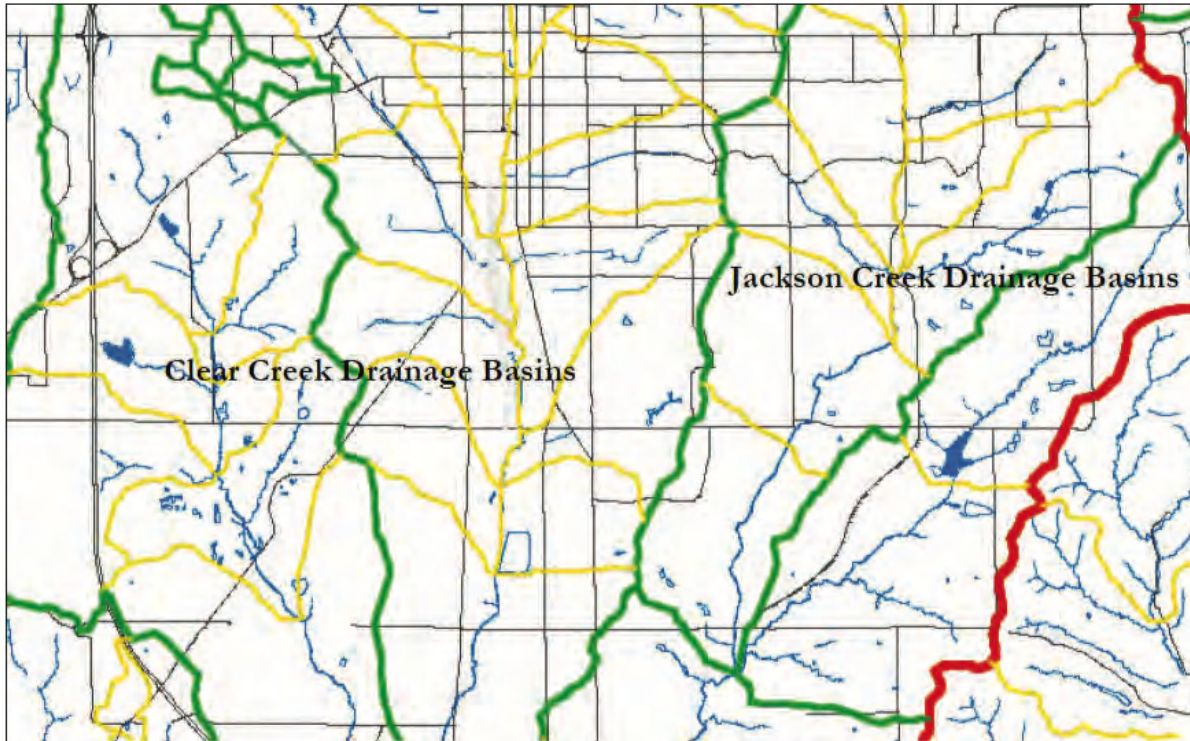
As stated in the 2003 COBERI report, the “important ecological functions” of water resources include:

- Providing critical terrestrial and aquatic habitat
- Providing surface water recharge and supply
- Controlling flooding and erosion
- Stabilization and moderation of climate
- Educational and recreational opportunities.

And the report underlined that,

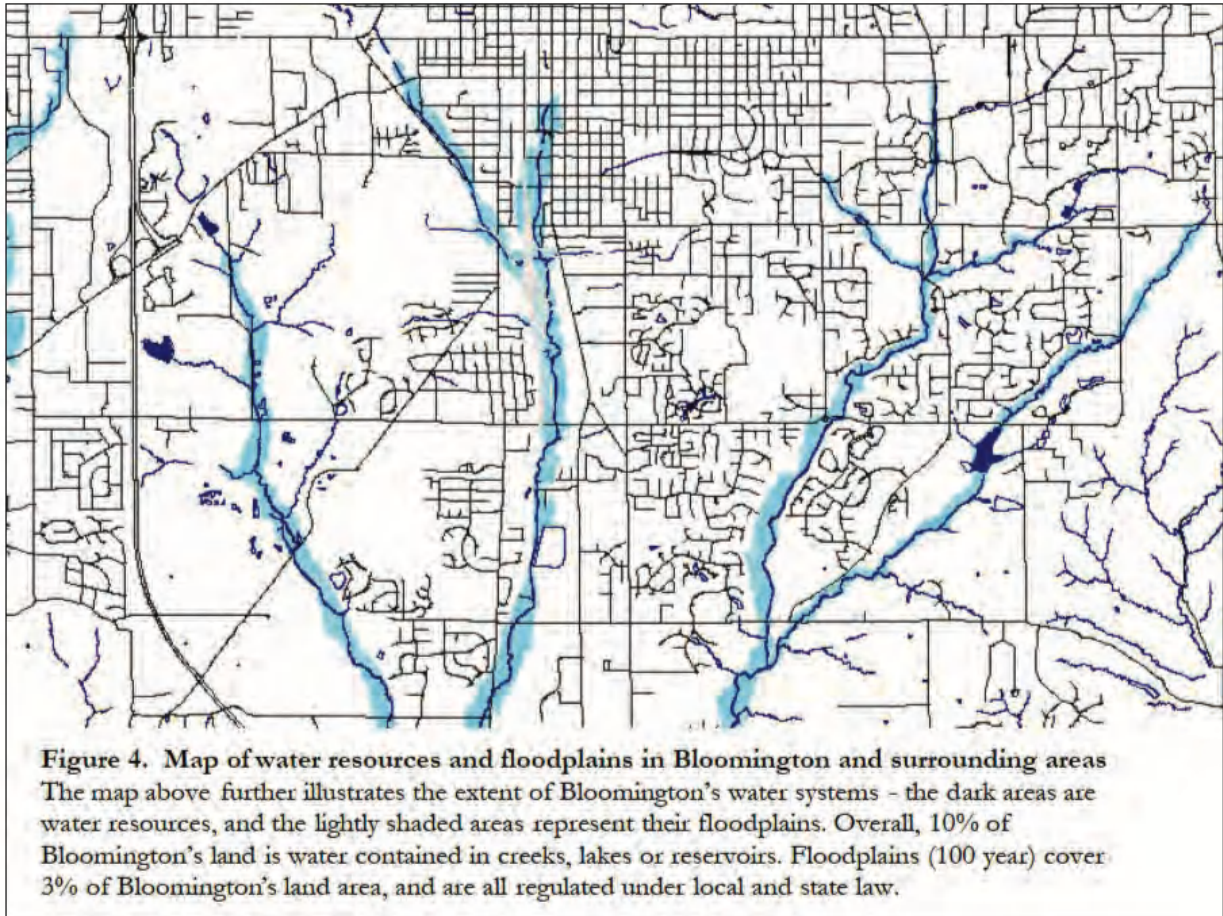
Issues pertaining to management of floodplains and water resources become more critical as land becomes more urbanized. Developing sound watershed management and planning activities that implement best management practices can help mitigate negative impacts.

The report also pointed out that “due to the challenging topography, Bloomington has an extensive network of watersheds that contribute to its waterways” (See Figure 3). The “two major waterways” in Bloomington are “Jackson Creek and Clear Creek”. “Both of these creeks have wide-spread tributary systems containing floodplains.” (See Figure 4 for 100 year floodplains)



**Figure 3. Map of watersheds in Bloomington and surrounding areas**

The map above illustrates Bloomington's water resources, as well as its major and minor drainage basins. The 6 main drainage basins in Bloomington are the Stout Creek, Cascades Creek, Griffy Reservoir and Griffy Creek, Sycamore Creek, Clear Creek (and west fork), and Jackson Creek (and east fork) basins.



The report highlighted that,

Past industrial activities have significantly degraded some of Bloomington's water resources. The Indiana Department of Natural Resources has issued fish consumption advisories for Griffy Reservoir, Lake Wapehani and Clear Creek.

Furthermore, Clear Creek has been listed by the Indiana Department of Environmental Management as one of Indiana's impaired waterways (emphasis added by author of letter) based on its current pollutant loads and poor habitat potential.

### **Impaired Waters**

The report did not further elaborate on the impaired status of Clear Creek, its current pollutant loads, or its poor habitat potential.

By searching impaired water of Indiana on the internet, we found that the Indiana Department of Environmental Management (IDEM) has published "Indiana's 2022 303(d) List of Impaired Waters" at <https://www.in.gov/idem/nps/watershed-assessment/water-quality-assessments-and-reporting/section-303d-list-of-impaired-waters/>. Under Monroe County, Clear Creek was listed,



as well as Weimer Lake, to our surprise. Below is an excerpt of section 303(d) List of Impaired Waters.

COUNTY	ASSESSMENT UNIT NAME	WATER TYPE	SIZE	UNITS	PARAMETER	DESIGNATED USE	IR CATEGORY
Monroe	CLEAR CREEK	STREAM	3.11	Miles	BIOLOGICAL INTEGRITY	Warm Water Aquatic Life	5A
Monroe	CLEAR CREEK	STREAM	0.59	Miles	BIOLOGICAL INTEGRITY	Warm Water Aquatic Life	5A
Monroe	CLEAR CREEK - UNNAMED TRIBUTARY	STREAM	6.74	Miles	BIOLOGICAL INTEGRITY	Warm Water Aquatic Life	5A
Monroe	CLEAR CREEK - UNNAMED TRIBUTARY	STREAM	3.58	Miles	BIOLOGICAL INTEGRITY	Warm Water Aquatic Life	5A
Monroe	WEIMER LAKE	LAKE, FRESHWATER	6	Acres	MERCURY IN FISH TISSUE	Human Health and Wildlife	5B
Monroe	CLEAR CREEK	STREAM	9.12	Miles	NUTRIENTS	Warm Water Aquatic Life	5A
Monroe	CLEAR CREEK	STREAM	3.11	Miles	PCBS IN FISH TISSUE	Human Health and Wildlife	5B
Monroe	CLEAR CREEK	STREAM	5.88	Miles	PCBS IN FISH TISSUE	Human Health and Wildlife	5B
Monroe	CLEAR CREEK	STREAM	9.12	Miles	PCBS IN FISH TISSUE	Human Health and Wildlife	5B
Monroe	CLEAR CREEK - UNNAMED TRIBUTARY	STREAM	2.51	Miles	PCBS IN FISH TISSUE	Human Health and Wildlife	5B
Monroe	CLEAR CREEK	STREAM	6.29	Miles	PCBS IN FISH TISSUE	Human Health and Wildlife	5B
Monroe	CLEAR CREEK	STREAM	3.52	Miles	PCBS IN FISH TISSUE	Human Health and Wildlife	5B

Parameters including “biological integrity”, “nutrients”, and “PCBS in fish tissue” (Clear Creek), and “Human health and Wildlife” (Weimer Lake) categorized Clear Creek and Weimer Lake in Category 5A & 5B and Category 5B, respectively. Category 5 is defined as:

Category 5: The available data and/or information indicate that at least one designated use is impaired or threatened and a Total Maximum Daily Load (TMDL) is required.

Waters may be listed in both 5A and 5B depending on the parameter(s) causing the impairment. Indiana's 303(d) list is comprised of all waters in Category 5.

A: The waterbody has one/more impaired biotic communities or is impaired for one/more pollutants.

B: The waterbody is impaired due to the presences of presence of mercury or PCBs, or both in the edible tissue of fish collected from them at levels exceeding Indiana's human health criteria for these contaminants.

Please note, that Category 5 (5A and 5B) is the most severe category. Under the Clean Water Act (CWA), states are required to develop a TMDL for these waters in order to achieve compliance with the water quality standards.

The Total Maximum Daily Load (TMDL) Program primary purpose is to assess streams, rivers and lakes that are considered impaired by the Indiana Department of Environmental Management and develop reports that identify the causes of the impairment, the reductions of pollutants needed, and the actions needed to improve water quality. Impaired waters do not meet designated water quality standards and do not support one or more designated uses, such as recreational, protection of aquatic life, drinking water, and fish consumption. Section 303(d) of the Clean Water Act established authority for the TMDL Program and guides states on how to develop these plans for waters that do not meet water quality standards.

(<https://www.in.gov/idem/nps/watershed-assessment/total-maximum-daily-loads/>)

As shown on the IDEM's website, Clear Creek (Monroe County) has not had a TMDL report completed. We request the City to work with IDEM to prioritize Clear Creek's TDML if possible, given the scale of the development, and the impaired state of Clear Creek and Weimer Lake.

On the topic of Weimer Lake, we are surprised to see that it is still listed on the IDEM's "Indiana's 2022 303(d) List of Impaired Waters" list. Has the removal of the dam not been reported to IDEM? Or have the relevant databases the State uses to compile this list not been updated?

### **Comprehensive Plan – Environment - Water**

In short, we would like to know how the City plans to take all measures possible to uphold its vision, policy, goals and programs in the "2018 Comprehensive Plan City of Bloomington"?

Under Chapter 3 Environment – Water of the Comprehensive Plan, the following stood out to us:

- Water is a vital natural resource for human survival. Most of us now live in an urban ecosystem, and we all need to be more cognizant of how water functions in it.

- Clean water is necessary to support the plants and animals in our ecosystems and food systems.
- Surface and stormwater quantity and quality are different, yet related, issues to consider in addition to drinking water. Moving surface water needs to be slowed down enough that it has the opportunity to infiltrate instead of flowing away at speeds that can cause dangerous and costly flooding and erosion and prevent the filtering of pollutants.
- Goal 3.3: Conserve water resources and protect water quality to support our natural environment, public health and safety, plant and animal life, and our urban activities.
  - a. Policy 3.3.1: Reduce pollution in urban runoff from residential, commercial, industrial, municipal, and transportation land uses.
  - b. Policy 3.3.2: Encourage conservation and protection of water sources in our region.
- Programs:
  - a. Increase the use of modern best practices for water quality and quantity control.
  - b. Utilize Low Impact Development measures such as rainwater harvesting and storm runoff infiltration, when feasible, as mitigation strategies for stormwater discharge.
  - c. Assess karst features and regulations to protect sinkholes and other karst features.
  - d. Simplify floodplain regulations without making them less restrictive.
  - e. Incorporate a stream classification system into the UDO to use in waterway and riparian buffer protection and enhancement.

How does the City plan to control surface and stormwater quantity? What Low Impact Development measure will be utilized in the Summit District PUD?

How does the City plan to not cause further pollution and burden to the already impaired Clear Creek? How does the City plan to achieve its Policy 3.3.1 (reduce pollution in urban runoff) in the Summit District PUD? How does the City plan to restore clean water to Clear Creek, to support the plants and animals in our ecosystems and food systems?

Without an updated study on water quality, on stormwater runoff, on the impact of dense urban development to Clear Creek and its flood plain, it would be hard to achieve the COBERI report's original intent, which was "part of a larger, on-going project that provides the factual foundation to further develop sustainable land-use and land development strategies for the City of Bloomington".

## VI. Karst Geology

“Karst terrains are extremely sensitive to development and changes in land uses”, as stated in the 2003 COBERI report, and “often, areas containing karst features offer unique habitats for a variety of rare organisms such as blind cave fish, the Indiana bat and other obligate cave dwelling species”. It adds, “it is important to properly manage all types of karst systems to protect their inherent geological, biological and ecological importance.”

The report also pointed out specifically for Bloomington that,

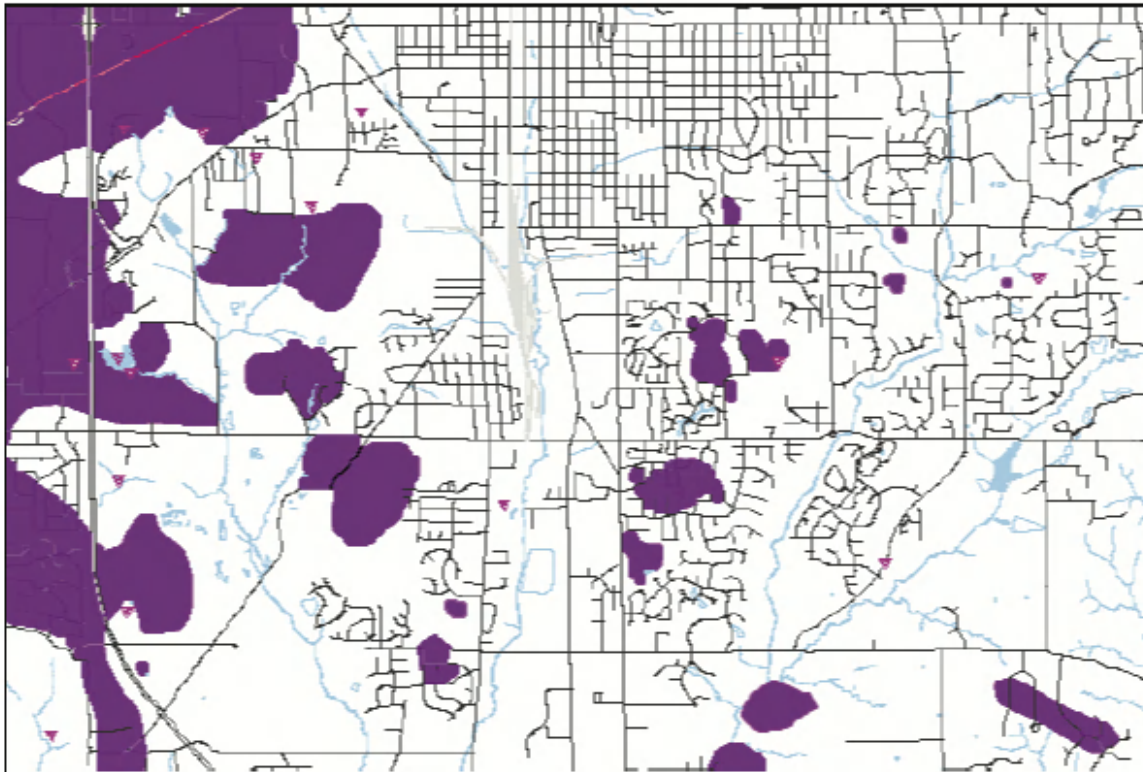
The most prominent surface karst features found in Bloomington include sinkholes, swallow holes, soil slumps and springs. Bloomington also contains extensive and complex underground water systems that have not been extensively mapped or studied. For that reason, this analysis will focus entirely on surface features, however, subterranean features should be considered for subsequent investigations.

Surface karst features were found to be scattered throughout Bloomington. Initial analysis revealed the highest concentration of features was found in the west and southwest portions of the City, followed by the south and southeast.

It is worthy of note that Bloomington’s “extensive and complex underground water systems” ... “have not been extensively mapped or studied”, and that surface features were the ONLY data available for analyses in 2003. To “guide and assist future decisions for land-use and land development strategies” as intended by the COBERI project, we request that “subterranean features should be considered for subsequent investigations”.

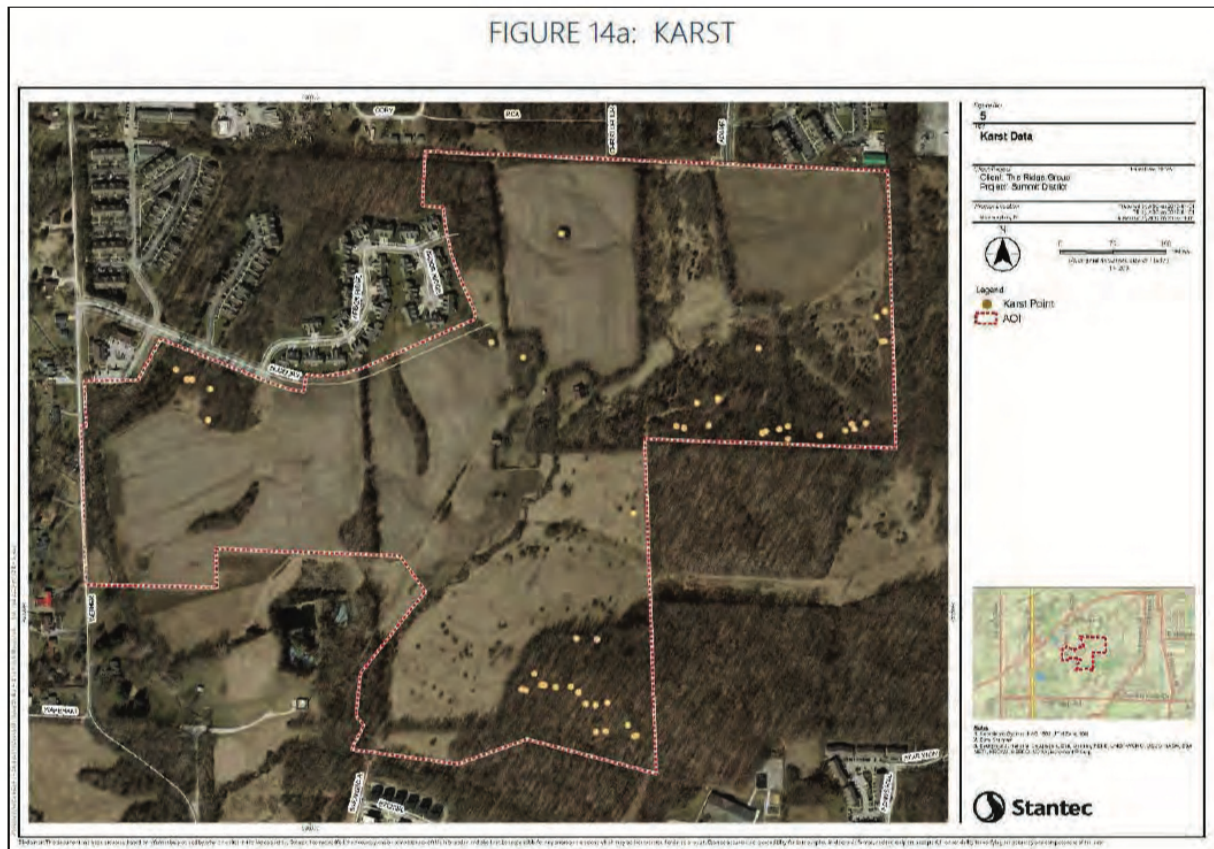
Figure 5 of the report illustrates the general locations of large karst areas in Bloomington and surrounding areas, based on surficial karsts features.

One can easily see the large area of karst features on Summit District PUD, as well as a perennial spring identified to the north of the karst area.



**Figure 5. Map of karst areas and springs in Bloomington and surrounding areas**  
The dark shaded areas above represent the larger karst areas in Bloomington. The shaded triangles represent approximate spring locations. Overall, surficial karst features cover 3% of Bloomington's land area, and there are over 20 perennial springs currently inventoried.

In regard to karst features, the Petitioner (Sudbury Development Partners, LLC) provided a map, “establishing specific environmental site features” (FIGURE 14a: KARST) in its Preliminary Plan. FIGURE 14a: KARST can be found on Page 159 of the meeting packet of the July 10 Plan Commission meeting. See screenshot below for the map provided by the Petitioner.



One can easily count approximately a total of 45 to 48 yellow dots (some adjacent to each other) representing karst features dotted all around the Summit District PUD, with several of them being in very close proximity to each other. It is unclear whether these karsts are surface, subterranean (surface) or compound. A quick search in the PDF did not produce any further explanation from the Petitioner. The Petitioner did not request exceptions on karst, so the Unified Development Ordinance (UDO) of the City of Bloomington applies.

Chapter 20.04.030 (g) Karst Geology of the UDO states that

This section shall apply to all land-disturbing activities on properties that contain surface and subsurface karst features.

Compound Karst Features is defined in Chapter 20.07.010 Defined Words of the UDO as

Karst, Compound

Any two or more karst features where the last closed contour of the features is located within one hundred feet of each other. The outer boundary of the compound karst feature shall be drawn by connecting the last closed contour of each individual karst feature with a tangential line.

We request that subsurface and compound karst features be identified in order to meet the requirements set forth in the UDO.

We request that a multi-phase karst investigation that is accordant with the latest State requirements and recommendations be conducted. “Proper Investigative Techniques in Karst, IDEM Technical Guidance Document, Updated: October 2021) states,

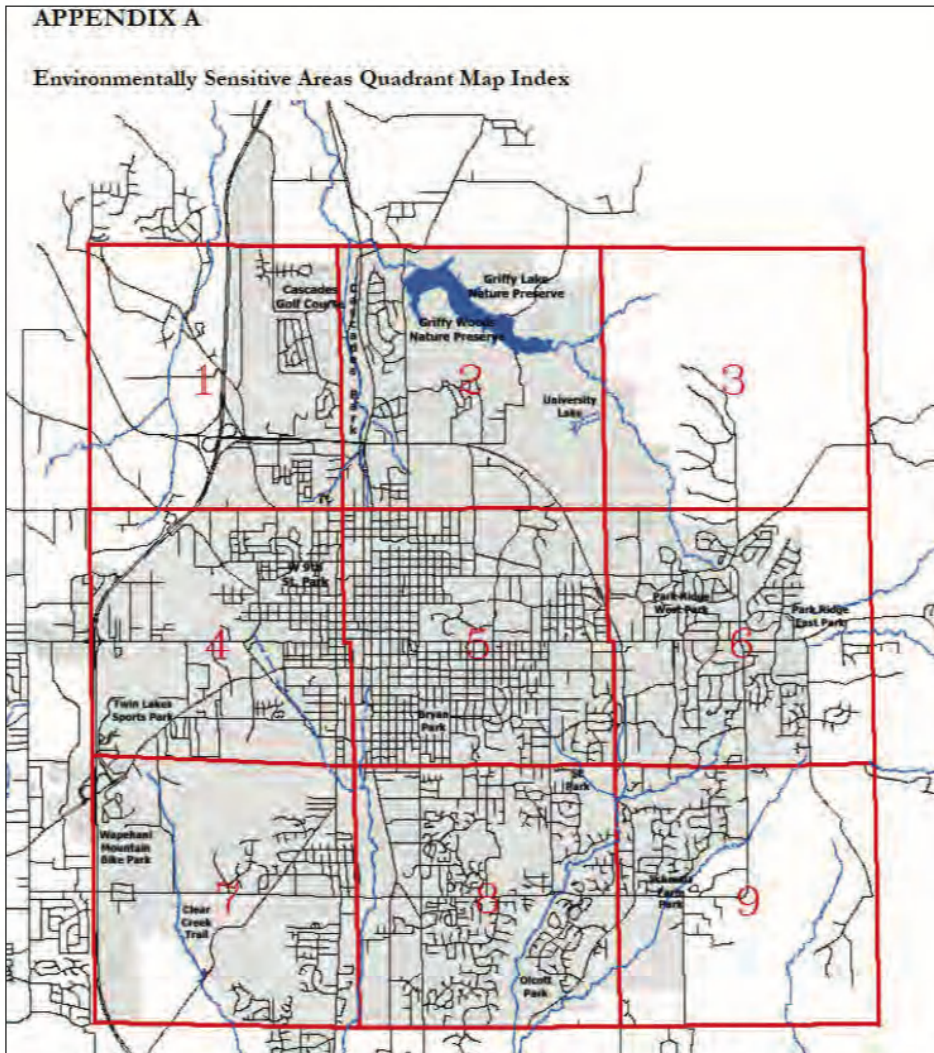
Environmental investigations in karst areas present unique problems. Conventional site investigation methods and installation of monitoring wells may not provide an accurate picture of how contaminants behave in a karst aquifer. Because of the very different morphological and hydrological features, investigations in karst do not typically employ the same techniques used in site characterizations conducted in non-karst environments. The guidance in this document will assist in the proper characterization of a site located in a karst area and provide information on the IDEM preferred method to conduct the 2 different types of dye tracing.

The development proposed by the Petitioner is unprecedentedly dense and aggressive in nature. Would we even have comparable case studies to reference across the country to ensure that development does not result in devastating long-term effects to the karsts and surrounding areas?

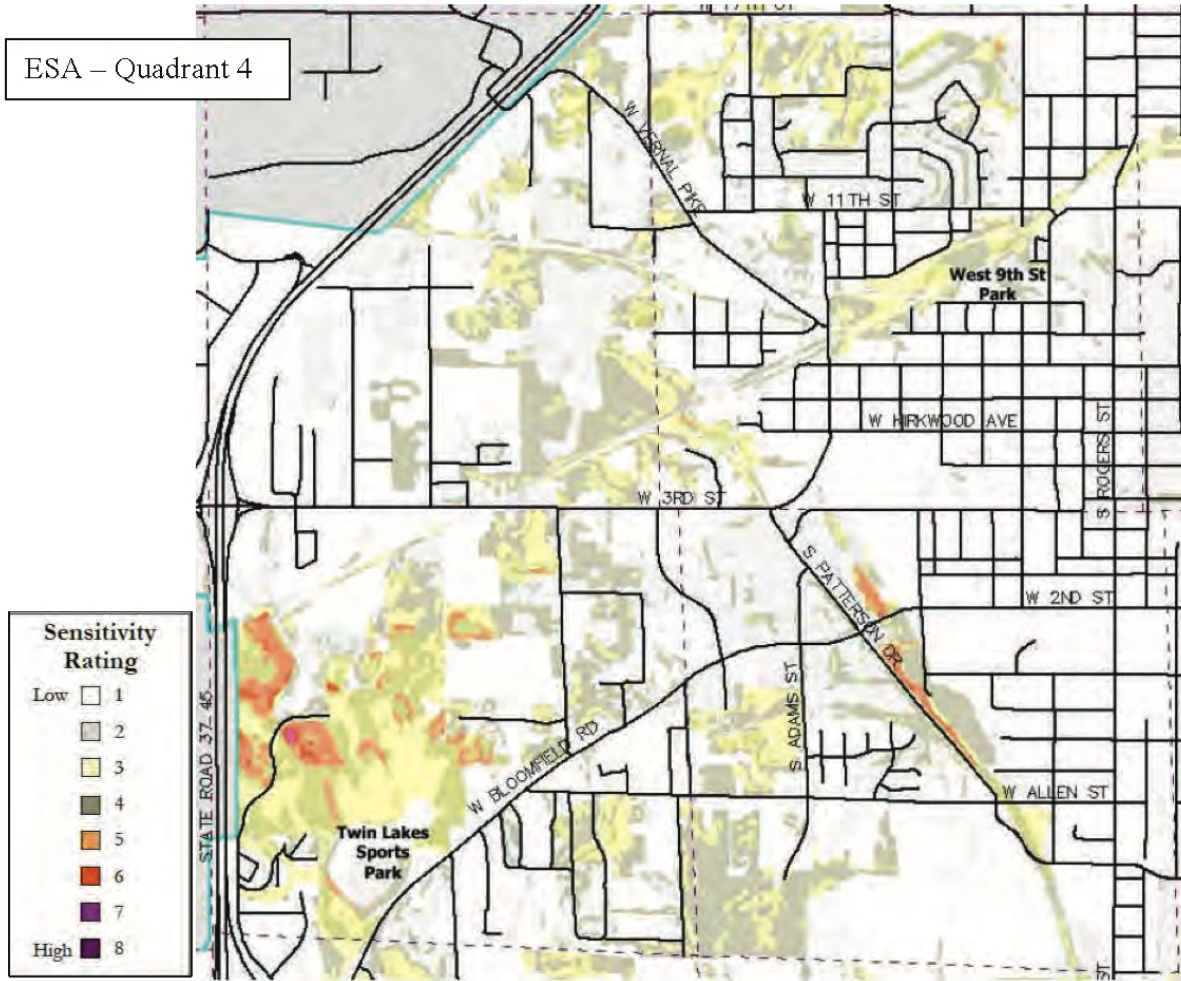
## **VII. Environmentally Sensitive Areas**

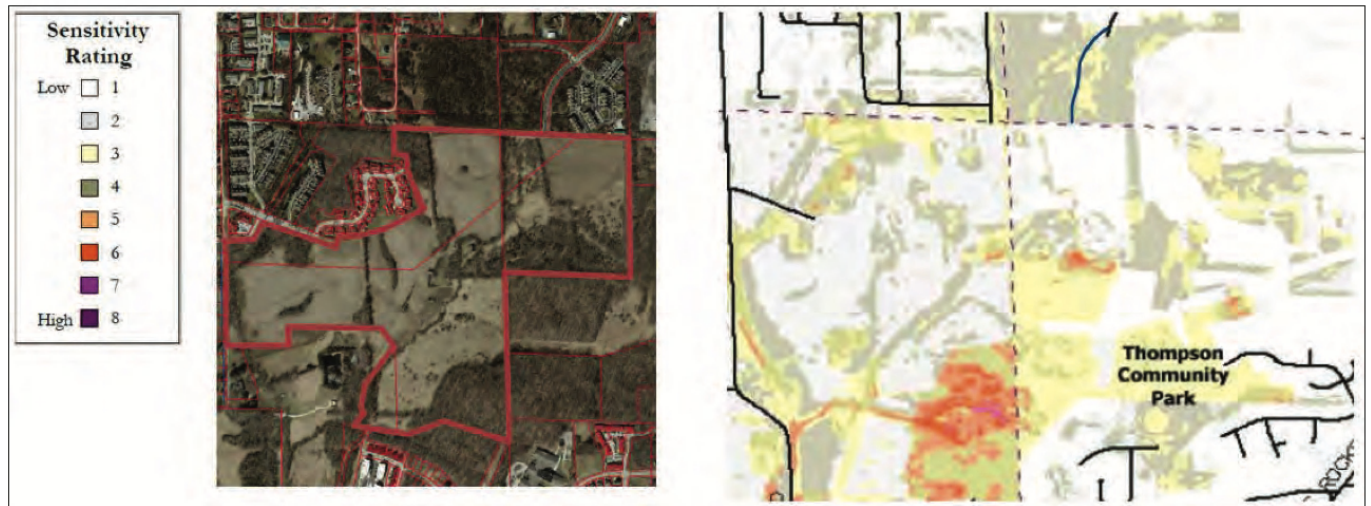
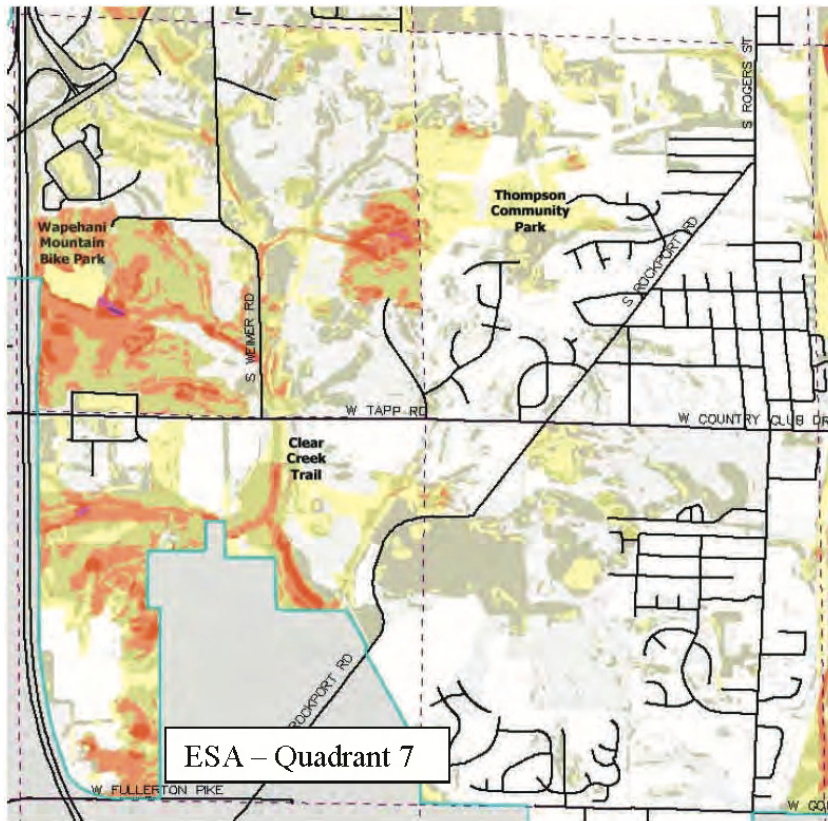
In addition, “the City of Bloomington’s Planning Department evaluated and ranked natural areas in Bloomington using an environmentally sensitive areas (ESA) analysis” ... “to better understand their (i.e., natural resources) roles and functions they must be studied as an interconnected system”.

The figures below are screenshots of the Environmentally Sensitive Areas Quadrant Index Map, Quadrant 4, and Quadrant 7 from the COBERI report.









The southern portion of the Summit District PUD is ranked high on the Sensitivity Rating, depicting the highly sensitive and diverse nature of the area.

### VIII. Comparison with Brown's Woods

Brown's Woods sits at 16 total acres on the west side of town sandwiched between Interstate 69, Forest Ridge Apartments, Limestone Crossing Apartments and the Indiana Rail Road.

The two screenshots below are taken from the "City of Bloomington Parks and Recreation Department Master Plan 2021 – 2025".





## Brown's Woods

Brown's Woods sits at 16 total acres on the west side of town sandwiched between Interstate 65, Forest Ridge Apartments, Limestone Crossing Apartments and the Indiana Rail Road. The undeveloped woodland is loaded with karst topography and full of sink holes making it perfect for a trail walk. The land has no plans for further development as of yet, but with the nearby Twin Lakes Sports Park this parkland could potentially be linked with via trail system and, and serve as additional nature park for the parks system and require little maintenance. With limited access (2 points) this would prohibit certain park development. Nonetheless, the property serves to be a considerable asset for the surrounding residents.

### Accessibility

- Not ADA accessible

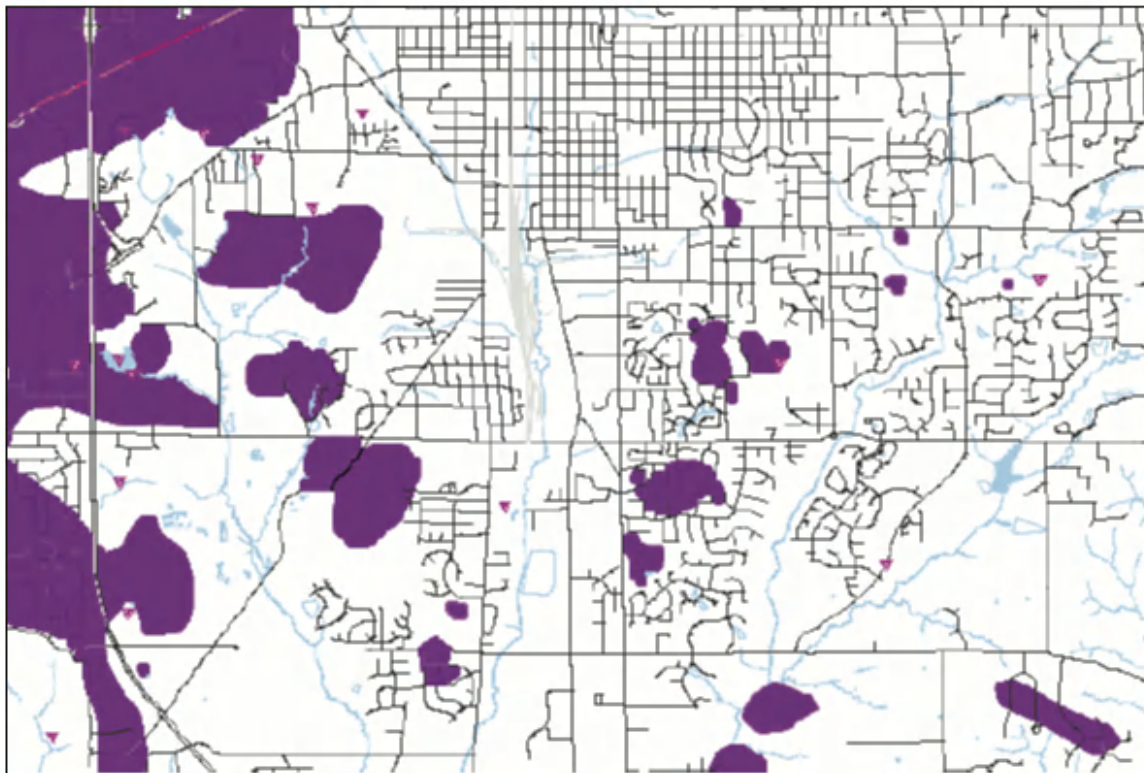


### Park Address:

101 W Kirkwood Ave Ste 307  
Bloomington, IN 47404

The Parks and Recreation Department pointed out that Brown's Woods – the “undeveloped woodland is loaded with karst topography and full of sink holes making it perfect for a trail walk”.

Based on the karst features map (See below) in the COBERI report, both Brown's Woods and a significant portion of the Summit District PUD are covered in the dark shaded purple. One can deduce that they are equally loaded with karst topography and full of sink holes, making them both perfect for a trail walk or some other suitable park or recreational use, and assumably not perfect for high density residential development.



**Figure 5. Map of karst areas and springs in Bloomington and surrounding areas**  
 The dark shaded areas above represent the larger karst areas in Bloomington. The shaded triangles represent approximate spring locations. Overall, surficial karst features cover 3% of Bloomington's land area, and there are over 20 perennial springs currently inventoried.

The Parks and Recreation Department goes on to state that,

The land has no plans for further development as of yet, but with the nearby Twin Lakes Sports Park this parkland could potentially be linked with via a trail system and serve as additional nature park for the parks system and require little maintenance. With limited access (2 points) this would prohibit certain park development. Nonetheless, the property serves to be a considerable asset for the surrounding residents.

Is the area too “loaded with karst features” and too “full of sinkholes”, causing delay of further development of trail connection and nature park? Nevertheless, even in its current state, the Parks and Recreation Department considers the “property to be a considerable asset for the surrounding residents”.

Also, using the Environmentally Sensitive Area – Quadrant 4 and 7 maps for a comparison of both Brown’s Woods and Summit District PUD, one can see that they both contain portions that are high on the Sensitivity Index.

If Brown’s Woods is too loaded with karst features and sink holes and too high on the sensitivity index, why is an area (Summit District PUD) equally sensitive and rich in karst features, suitable for development?

## **IX. Other Concerns and Summary**

Besides the environmental questions and concerns stated above, we also noticed that the Petitioner did not organize a Pre-Submittal Neighborhood Meeting as required by the UDO. Under *Chapter 20.06.040 Common Review Procedures, Section (b) Pre-Submittal Activities, sub-section (3) Pre-Submittal Neighborhood Meeting*, one can find the purpose, applicability, and the notification process, etc. of a Pre-Submittal Neighborhood Meeting.

### Chapter 20.06.040(b)(3)(A) Purpose

The purpose of the pre-submittal neighborhood meeting is to allow residents, businesses, and organizations in the area surrounding a proposed development project an early opportunity to learn about the project details and to provide feedback to the petitioners before significant funds have been spent on project design and engineering.

### Chapter 20.06.040(b)(3)(B) Applicability

A pre-submittal neighborhood meeting shall be required as indicated in Table 06-1: Summary Table of Review Procedures.

**Table 06-1: Summary Table of Review Procedures**

R = Review and Recommendation D = Decision A = Appeal \* = Public Hearing Required

Procedure	UDO Section	Public Notice			Pre-Submittal Activities			Review and Decision-Making Bodies						
		Published	Mailed	Posted	Pre-Submittal Meeting	DRC Meeting	Neighborhood Meeting	Staff	Plan Commission	Plat Committee	Board of Zoning Appeals	Common Council	Hearing Officer	Historic Preservation Commission
Vacating Plat	20.06.060(d)	✓	✓	✓	✓	✓		R	D*/A	D*				
<b>Plan/Ordinance Amendments</b>														
Comprehensive Plan Amendment	20.06.070(a)	✓						R	R*				D*	
Zoning Map Amendment	20.06.070(b)	✓	✓	✓	✓	✓	✓	R	R*				D*	
Rezoning to Planned Unit Development (PUD)	20.06.070(c)	✓	✓	✓	✓	✓	✓	R	R*				D*	
Zoning Text Amendment	20.06.070(d)	✓	✓		✓			R	R*				D*	
<b>Flexibility and Relief Procedures</b>														
Minor Modification	20.06.080(a)				✓			As required for associated petition						
Variance	20.06.080(b)	✓	✓	✓	✓			R				D*/A		D*
Administrative Interpretation	20.06.080(c)							D				A		
Administrative Appeal	20.06.080(d)	✓	✓					R				D*		

Staff at the Plan Commission has stated in its staff report (Page 86 of the July 10 meeting packet), “the petitioner is requesting a map amendment to rezone the property to a new PUD, which includes the approval of a new District Ordinance and Preliminary Plan”, which, per Table 06-1: Summary Table of Review Procedures, a Pre-Submittal Neighborhood Meeting is required for “Zoning Map Amendment”.

It also has not gone unnoticed to us that the Petitioner’s Preliminary Plan is very similar in font, font size, numbering system, footer style, table style to the City of Bloomington’s UDO. Other development projects’ planning documents do not seem to share this striking similarity!

In summary, we would like to encourage the Plan Commission and City Council members to put the environment at the foremost of Bloomington’s growth and development, as the City of Bloomington has strived do. The City of Bloomington stated in its “2018 Comprehensive Plan” that it “has a long-held commitment to protecting the environment”. The city also aims to “introduce ways to ensure that the current natural environment is not only protected, but nurtured and enhanced for the future”. Further, the City stated that “we have ways of thinking about what environmental protection is, and how it is accomplished now, that are different than years ago, and the philosophy of this chapter reflects that change.”

It’s important to note that the 2018 Comprehensive Plan renamed and replaced the Growth Policies Plan of 2002, with the hope that as time has changed, so should our plan; except that no new environmental resource inventory analyses have been conducted since 2003 to inform the

decisions and planning of the City of Bloomington. What was supposed to be “part of a larger, on-going project that provides the factual foundation to further develop sustainable land-use and land development strategies for the City of Bloomington” did not lead to any on-going project that we could identify online.

As emphasized by the EC, the numerous exceptions to the UDO do not offer the assurance that the proposed use and development will be designed to minimize negative environmental impacts and not cause significant adverse impacts on the natural environment. We share the same concern.

“Climate, thus environmental, change has long term impacts on all residents and must be prioritized”. We urge the Plan Commission to hold the Petitioner and all other developments to the integrity and best practices required of them in the UDO and all available environmental protection guidelines/requirements, and only allow for exceptions that will not negatively affect the environment both in the short-term, and the long-term.





Jacqueline Scanlan &lt;scanlanj@bloomington.in.gov&gt;

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**PUD-18-23 Sudbury Development Partners LLC**

2 messages

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**Joseph McKenna** <joemckenna\_07043@yahoo.com>

Thu, Aug 17, 2023 at 3:22 PM

To: "scanlanj@bloomington.in.gov" &lt;scanlanj@bloomington.in.gov&gt;

Good Afternoon

I am an Arbor Ridge resident and my wife and I attended the meeting on Monday August 14.

I want to echo the concerns of my neighbors:

density, drainage, traffic conditions including current state of Weimer Road, along with environmental concerns.

I know that that property will be developed eventually, but the number of units seems high.

Finally, from my own personal experience, there is a lot of wildlife living in the area -- everything from deer to turtles.

We appreciate your efforts to keep the residents in the area informed.

Thanks

Joseph McKenna  
1984 W Arbor Ridge Way  
Bloomington, IN 47403  
973 766 3428

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**Jacqueline Scanlan** <scanlanj@bloomington.in.gov>

Wed, Aug 23, 2023 at 8:48 AM

To: Joseph McKenna &lt;joemckenna\_07043@yahoo.com&gt;

Thank you, Mr. McKenna. I will add this to the letters for the September hearing. We appreciate you being involved.

Thanks,  
Jackie Scanlan, AICP  
Development Services Manager

[Quoted text hidden]

Bloomington Plan Commission,

I would petition the commission to show some **respect** and **consideration** for the established neighborhood of Arbor Ridge by not connecting Arbor Ridge Way to the new development.

There are many foreseeable issues that could arise by extending Arbor Ridge Way:

1. The Arbor Ridge home owners are a predominately elderly population so safety is an utmost concern as it is likely cars from the new development will speed down our street. Our street is narrow, curvy and on a hill. It already is often down to a single lane as delivery vehicles, service vehicles and visitors of residents park on the street causing us to have to manipulate the curves with decreased visibility.
2. I also envision cars from the Sudbury development coming down onto our street to park.
3. Arbor Ridge Way will not sustain such an increase in traffic. Not to mention how disruptive this would be to our small, quiet 20 year old neighborhood. We all have to back out of our drives to get to the street so dealing with frequent oncoming cars would be a big safety issue. Also it is expected there would be traffic through our quiet neighborhood at all hours of the night.
4. We would appreciate staying as separate as possible from this vast development. Keeping the tree line at the end of Arbor Ridge Way intact would help us maintain some of our privacy and ensure more safety to our residents. Taking away our privacy and the separateness from the development would undoubtedly, in the long run, make our property less desirable and could ultimately decrease our property values.
5. The main issue is it is not necessary to connect the streets. Sudbury Drive through the development will come out at the same spot Arbor Ridge Way does, so there is no need for people to have to come through our neighborhood to arrive at the same location. It would be understandable to connect these roads if Arbor Ridge Way was the only access to get to Sudbury Dr. but since it is not, there is no advantage to do so.

A lot of future issues could be avoided by **not** extending Arbor Ridge Way. I do not see connecting our neighborhood to the Sudbury development as a benefit but as a definite detriment to our community.

Respectfully Submitted,

Pamela Arthur  
18 year Arbor Ridge homeowner  
1575 S. Arbor Ridge Ct.



Jacqueline Scanlan &lt;scanlanj@bloomington.in.gov&gt;

## Sudbury PUD

2 messages

Steve Smith &lt;slsmith@smithdginc.com&gt;

Tue, Jul 11, 2023 at 3:35 PM

To: "ron.smith@bloomington.in.gov" <ron.smith@bloomington.in.gov>, "scanlanj@bloomington.in.gov" <scanlanj@bloomington.in.gov>, "robinsos@bloomington.in.gov" <robinsos@bloomington.in.gov>, "andrew.ciber@bloomington.in.gov" <andrew.ciber@bloomington.in.gov>

Greetings,

I casually watched last night's Plan Commission meeting but got drawn in by the amazing details of the Sudbury proposal that prompted me to write this message to you. By my calculations the proposed Sudbury PUD is about 1.5 to 2.0 times the density of the K-mart multifamily site and about eight times larger in area. I use the K-mart site for comparison because it is so visible and because I have heard only negative and sometimes very negative comments about it from my friends and neighbors. The K-mart site plan very effectively uses nearly all of the site and for Sudbury to be denser by a factor of 1.5 to 2.0 means that it must go higher; and K-mart site is already I believe up to 5 stories. I do not believe that those in attendance at the hearing (plan commissioners, public or staff) understand the immensity of the proposal.

The petitioner presented a perspective concept for the site at the meeting, but when questioned he indicated that it was not a true representation of what would be developed. A 2-D plan was included in the staff report page 240. I believe that to get between 4400 and 6000 units on that site, it will need to look like the drawing presented and will be the equivalent of more than 13 K-mart sites (based on number of units).

The K-mart site has 340 units on about 12 acres for 28 units per acre. The K-mart site plan is efficient with no land lost to environmental features, thoroughfares etc.

The 140 acre Sudbury site will lose about 40 acres to environmental features and through roadways leaving about 100 acres for development. The density of the developed area will be between 44 and 60 units per acre. This is about 1.5 to 2.1 times denser than the K-mart site.

- Sudbury is 1.57 to 2.14 times as dense as K-mart
- Sudbury would be equal to 8 K-marts based on acreage
- Sudbury would be equal to 13 to 17 K-marts based on number of units

Traffic was mentioned at the hearing and apparently a traffic study will be done. Rough projections are about 6 trips per day for each multifamily unit. Assuming a maximum of 6,000 units results in 36,000 newly generated trips per day. A two-lane road like Weimer or Adams typically can accommodate 3,000 to 5,000 ADT at a reasonable level of service. This doesn't account for the issues that those roads currently have.

Again, back to K-mart; there are traffic concerns though I think they are not warranted. The K-mart site with 340 units fronts on a State Highway with two signalized intersections and reasonable cross connections via Clarizz and entry to the College Mall. K-mart will largely serve students whose destination is a direct bus ride away. Sudbury, at 13 to 17 times the number of units, has access via 2 lane Weimer and Adams and is not close to the University or employers.

Traffic will be a problem.

One of the neighbors noted that this project proposes more units in the next eight years than the total projected need in the City. I would add that historically there have been about 500 new units in Bloomington each year (going back for 15 years). This project alone proposes up to 750 units per year. The math does not work.

I am writing to help ensure that all involved understand the immensity of the proposal. A shocking proposal that I believe is not consistent with the vision of our community as expressed in numerous plans

over the years and the current PUD zoning of the site.

thanks for your time  
Steve Smith  
Retired Professional Engineer and Land Surveyor

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**Jacqueline Scanlan** <scanlanj@bloomington.in.gov>  
To: Steve Smith <slsmith@smithdginc.com>

Tue, Jul 11, 2023 at 3:49 PM

Thanks, Steve! I'll look through this and make sure we're discussing the issues clearly.

Thanks,  
Jackie  
[Quoted text hidden]

JOHN A. SCOTT  
1966 W Arbor Ridge Way  
Bloomington, IN 47403

August 1, 2023  
Plan Commission  
4071 N Morton St.  
Suite 130  
Bloomington, IN 47404

President of the Commission

I am writing in response to the Sudbury Partners LLC petition requesting an amendment to rezone the 140 Acres known as Sudbury Farm increasing the density of the current PUD zoning to a new PUD that will allow up to 6,000 new housing units. I am opposed to the plan as put forth by Sudbury Partners LLC and Sullivan Development.

The Commission needs to say no to issues 1 to 5 as expressed on page 89 of the July presentation.

The petitioner is requesting the following changes to the present zoning.

1. Density
2. Building Height Standard
3. Parking Square Footage
4. Environmental Requirements/Impact

## Density

The proposal by the above seeks several changes in their request that are well beyond the density for the area. Taking their maximum number of units and the ratio for Bloomington of 1.99 to 2.09 individuals per housing unit and using the formula To calculate the population density (divide the population by the size of the area) Population Density = Number of People/Land Area. The unit of land area should be square miles or square kilometers. The figure  $1.99 \times 6,000 = 11,940$  People. Using  $2.09 \times 6,000 = 12,540$  people for the area. Converting 140 acres to square miles gives the figure 0.21875 square mile or 21.8% of a mile or 12,540 individuals living in under a square mile. This well exceeds the present number per square mile when compared to the overall density of Blooming using 2021 figures the population of Bloomington at 79,968 divided this figure by Bloomington's Square miles of 23.43 gives a population figure of 3,413 per individuals per square mile.

## Building Height Standard

The petitioner is requesting a waiver of the building height standard. The present standard for mixed use under Code 20.02.030 is six stories or a maximum not to exceed seventy-five feet. The height of a 7-story building is between 70 to 75 feet depending on the ceiling height. The present zoning allows them to go ahead with the 6-story height. However, a building of that height if built around the perimeter of the property will dwarf the existing neighborhood and homes which are single-family dwellings. Building of this height could block existing views and could cause privacy concerns if overlooking back yards. The addition of another floor benefits the developer in federal funding at the expense of the surrounding

neighborhoods. One of the pluses the developer is citing is the mixed-used development where 15% of the units would be set aside for low-income families. This would set aside 900 units if 6,000 were allowed a very high mixture. There are more benefits to the developer than to the City and Residents of Bloomington. The most common incentive to build mix use is more financial than ultraistic. The benefits are usually, zoning variances, such as reduction in site development standards, modification of architectural design and reduction in parking standards, all things the developers is seeking. There is also the issue of the density bonus granted to buildings accommodate a fair share of affordable units. The developer does not attempt to cite the impact this number of residents will have on Police, Fire, Sanitation and Schools. Summit Elementary would require an addition to be built. There is also a need for a police substation as well as the fire department.

### Environmental

The Bloomington Environmental Commission in its July 13 memo stated it has not toured the site and is unable to make an assessment as to the scope the project will have on the environment. The Commission mentions that there are countless environmental features dotting the area and the request for numerous environmental changes will have excessive impact on environmental resources. 1. Runoff - one thing not mentioned is the issue of Runoff or NPS pollution caused by rainfall and snowmelt causing erosion and Runoff which picks up fertilizer, oil, pesticides, dirt, bacteria, and other pollutants as it makes its way from the roads, sidewalks and lawns which empty into

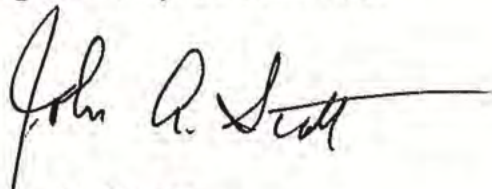
storm drains and ditches. 2. Water, Sanitation and Storm management issues have not been addressed. The partitioner has not provided a valid Environmental Impact Statement.

### Traffic

The issue of Streets and Roads has not been adequately or clearly addressed. Depending on the final number of units approved, the number of cars can be anywhere from 6,000 to 9,000 cars assuming a ratio of 1.5 cars per unit which allows for units with no cars and those having two or more. This number of cars will cause extensive use of the following streets based on the vagueness of their plan, Weimer Rd, S. Adams St, W. Tapp Rd, W. Cherokee DR, W. Chambers DR, W. Duncan DR, W. Guy Ave all which can be potentially connected to depending on the layout of the development leading to potential degrading due to the intensity of the additional traffic as cars heading to I69 and down Country Club to Walnut. The last Traffic count conducted for W. Tapp Rd was done in 2019 with an average count of 13,806 cars a day.

I believe the present PUD standards should be maintained they were well thought out and represent the best utilization of undeveloped land. The present PUD plan creates realistic size neighborhoods creating cohesive communities.

Respectfully submitted.

A handwritten signature in black ink that reads "John A. Scott". The signature is written in a cursive style with a long horizontal line extending from the end of the name.

John A. Scott





Jacqueline Scanlan &lt;scanlanj@bloomington.in.gov&gt;

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## Sudbury PUD

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Steve Smith &lt;slsmith@smithdginc.com&gt;

Tue, Jul 11, 2023 at 3:35 PM

To: "ron.smith@bloomington.in.gov" <ron.smith@bloomington.in.gov>, "scanlanj@bloomington.in.gov" <scanlanj@bloomington.in.gov>, "robinsos@bloomington.in.gov" <robinsos@bloomington.in.gov>, "andrew.ciber@bloomington.in.gov" <andrew.ciber@bloomington.in.gov>

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thanks for your time  
Steve Smith  
Retired Professional Engineer and Land Surveyor



Jacqueline Scanlan &lt;scanlanj@bloomington.in.gov&gt;

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**Fwd: Concern about storm water management regarding the Summit District PUD hearing by Bloomington Plan Commission on July 10, 2023:**

1 message

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Linda Thompson <thompsol@bloomington.in.gov>  
To: Jacqueline Scanlan <scanlanj@bloomington.in.gov>  
Cc: Scott Robinson <robinsos@bloomington.in.gov>

Sun, Jul 9, 2023 at 10:36 AM

FYI.

----- Forwarded message -----

From: **TEDFRICK** <tedfrick@indiana.edu>  
Date: Sun, Jul 9, 2023 at 9:48 AM  
Subject: Concern about storm water management regarding the Summit District PUD hearing by Bloomington Plan Commission on July 10, 2023:  
To: [environment@bloomington.in.gov](mailto:environment@bloomington.in.gov) <[environment@bloomington.in.gov](mailto:environment@bloomington.in.gov)>

Hello,

Where will the increased storm water run-off go if this proposed PUD goes forward?

My wife and I reside and own our home at [1812 S. Weimer Rd.](#) As adjacent property owners, we recently received notice of the Bloomington Plan Commission hearings in July and Aug. regarding the proposed Summit District PUD. We've lived here since 1977, and have witnessed a number of heavy rainstorms and their after effects along Weimer Road, including:

1. flooding of the southern portion of Weimer Rd. where there is a narrow one-way bridge,
2. flooding in the valley in the northern portion which allows drainage into Clear Creek from the remaining Twin Lake along W. 2nd St. and
3. flooding along the Clear Creek Trail south of Tapp Road.

Storm water run-off from the western portion of the proposed Summit District PUD will be draining into the Clear Creek basin along Weimer Rd., directly across from the Twin Lake drainage basin. The run-off down that steep hillside area is already considerable, with evidence of deepening ravines caused by soil erosion in this now grassy hillside field.

In the current proposed Summit District PUD, it appears that most of the larger buildings will be multi-story, in order to provide up to 6,000 new housing units located on terrain with considerable slopes for storm water runoff. The rough drawing on p. 240 of the proposed PUD is very telling. The majority of the land use would have large buildings containing most of the 6,000 units, likely to be apartments. And that means paved parking lots will also be needed for residents in these larger multi-story buildings.

There will be considerable new non-permeable rooftops, parking lots, sidewalks and streets in the proposed PUD. Unless there is some kind of effective mitigation, storm water run-off will predictably exacerbate flooding issues along S. Weimer Rd. and further south along the Clear Creek Trail when there are heavy rainstorms.

The removal of the dam and draining of Weimer lake in the Wapahani Mountain Bike Park several years ago has already created more flooding issues surrounding the narrow bridge on the southern portion of Weimer Rd. Up until then, we do not recall any flooding along Weimer Rd. after heavy rainstorms—in the past 46 years we have lived here. More recently, flooding across Weimer Rd. has happened several times since the Weimer Lake dam was removed. Although this is not part of the proposed PUD, it is nonetheless a contributing factor to more flooding along Clear Creek near Tapp Rd. The PUD would likely contribute even more run-off to an already existing issue.

In summary, storm-water management is our biggest concern about the proposed PUD and the potential impact this would have on flooding along S. Weimer Rd. Increasing non-permeable surface areas in this hilly terrain will mean less water soaks into the soil and more water runs downhill.

Ted and Kathy Frick  
[1812 S. Weimer Rd.](#)

Bloomington, IN 47403

--

**Linda Pride Thompson**

she/her

**Senior Environmental Planner**

Environmental Commission Administrator

Planning and Transportation Department

City of Bloomington

[401 N. Morton St., Suite 130](#)

PO Box 100

Bloomington, Indiana 47402

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fax 812.349.3520

direct line 812.349.3533

mobile 812.369.0666



Jacqueline Scanlan &lt;scanlanj@bloomington.in.gov&gt;

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**Comments for PUD-18-23: Sudbury Development Partners, LLC. (Summit District PUD) South Weimer Road**

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Thomas Landis <landis.thomas@gmail.com>  
To: scanlanj@bloomington.in.gov

Wed, Nov 1, 2023 at 2:48 PM

Dear Planning Staff, Plan Commission, and Members of the Public,

This letter is in support of the Sudbury project and the idea of urban and suburban density in Bloomington. As a member of the community and real estate business owner, I support this project for the reasons many are against it: environmental conservation and affordable housing options.

My wife and I first moved to Bloomington in 2014. We were surprised to learn that while the city and the county both appeared to advocate against urban sprawl, the city rejected tall buildings and the county rejected small lots. I was struck, if the city cannot build up and the county cannot build close, how is sprawl not the only option? Especially when by-right zoning makes most forms of housing illegal except the single-family house.

We see the negative impact of urban sprawl in our community, across the nation, and around the world. Various non-profits like the Urban Land Institute and Strong Towns demonstrate how low-density housing concentrates wealth and leads to environmental degradation. At the simplest level, limited supply increases the market price of a house and leads to larger houses to support building costs. The increasing footprint leads to more non-native (and chemically manicured) lawn space and impermeable surface that exacerbates water runoff and limits biodiversity.

Encouraging dense development outside of the downtown area creates the potential for responsible growth that can exemplify the best of what real estate can offer: vibrant community, harmony between the built and natural environment, jobs for those servicing the shops and merchants created in a master planned community like this, and an example for others to follow.

The proposed development has the potential to provide much-needed housing and contribute to a more sustainable and equitable urban landscape. I support it.

Sincerely,  
Thomas Landis

Dear Marsha,

Saturday, July 7, 2023

Do you know or remember that Pauley's original plan showed Sudbury Drive NOT dead-ending where it does? His Plan showed Sudbury Drive continuing straight East behind our first 3 condos on the South side as you enter AR and continuing straight East fairly close to Leland & Betty Christman's condo and very close (behind) Andrew Vogel's 1569 S. AR Ct., still running East to eventually bisect a continuing Adams Street. Our condo at 1559 S. AR Ct would be effected, since that 2002 or 2003 plan also showed a new street behind our condo, which ran North/South thru the Karst and also bisected an extended E/W Sudbury Drive.

I'm bringing this up because below our hill in back and running at an angle from about 20 yards behind our 1559 condo NW to SE is an area of KARST which probably ends about 50 yards to the SE of 1559. It's a narrow strip of karst, true, but where it ends there is definitely a very smallish cave. My point is that I never could understand why Pauley had been allowed originally (evidently) to cross that narrow strip of Karst with 2 planned Streets. If one continues on SE from the little cave, there is a much larger area of Karst which ends near the road/path of dirt that the Sudburys used to access their old barn and their house.

I know that area, and in fact almost ALL the area that will be developed. Harvey Sudbury gave me the run of his entire property for several years, so I know the whole area well, clear to the back of RCA (?) park etc, plus the area where new electrical towers run through East/West clear to the new apartment buildings Pauley built 2/3 of a mile Northeast of AR. Anyway, my whole point is that I do NOT think a developer should be allowed to put streets or any houses or yards where Karst exists!

I will not attend meetings that our AR Board attends regarding ins and outs of the Sudbury Development, but I want you and the Board to know of my concerns. The 2 places of Karst I mention are not the only places on the entire 150 acres where Karst exists. If you feel our AR Board needs to know more about where the Karst is on that land, I'd be glad to show Dennis Drake the spots I'm bringing up and/or we could check out any place on the 150 acres you/we need to know about.

thanx — Tom J.