

July 15, 2020

City of Indianapolis Department of Metropolitan Development  
City-County Building  
200 E. Washington St., Ste. 2042  
Indianapolis, IN 46204



Dear Members of the Metropolitan Development Commission,

I am writing regarding 2020-CVR-821, which concerns a variance of development standards of the Consolidated Zoning and Subdivision Ordinance to provide for a carwash at 111 W. 38<sup>th</sup> St., Indianapolis, Indiana 46208. Health by Design, a coalition working at the intersection of the built environment and public health, is supporting staff's recommendation for denial and opposing the petitioner's variance request.

Recent publicly vetted planning and community development initiatives, including the Great Places Mapleton Crossing Plan (2014) and the Red Line Transit-Oriented Development Strategic Plan (2015), have focused on the area surrounding this site. The latter was adopted by the MDC as a supporting document to the City-County's comprehensive plan. Both plans support the overall goals and objectives of citywide adopted plans, including the Indianapolis/Marion County Pedestrian Plan (2016); Marion County Land Use Plan (2018); Indy Moves Transportation Integration Plan (2018); and Thrive Indianapolis (2019) sustainability and resilience plan.

Unfortunately, the proposed reuse of this site is not compatible with the needs identified by the community in those plans. Each plan—adopted or advisory—calls for a variety of interventions with respect to the built environment, including implementation of traffic calming measures; more walkable, community-oriented services; mixed land uses; safer pedestrian and bicycle infrastructure; as well as general streetscape improvements. Furthermore, the parcel in question is situated in one of the highest pedestrian crash areas in Marion County and is emblematic of the safety issues posed by permitting another auto-oriented land use in an otherwise compact, transit-dependent area.

Additionally, it is essential for this body to recognize the impact this decision will have on vulnerable populations living and working in proximity to the site. According to an analysis completed by the Indianapolis Metropolitan Planning Organization, the parcel is situated in a census tract with one of the highest concentrations of environmental justice populations in Marion County. In comparison to the county average, Census Tract 3503 is home to greater populations of minorities, households in poverty, seniors, households with a disability, and zero-car households. Any decision should be considered with the concern and diligence these residents deserve.

Too often, past policy decisions made around transportation, land use, and zoning have caused irreparable harm to the health and quality of life of our city's residents. Denial of this variance request will avoid further negative repercussions. Thank you for your consideration and service to our community.

Sincerely,

A handwritten signature in cursive script that reads "Kim Irwin".

Kim Irwin, MPH  
Executive Director