



Date: August 24, 2026

To: Natural Resources Commission

From: David Knipe, P.E., CFM
Director, Division of Water

Re: Petition for the Establishment of the West Lake Conservancy District
Cause No. 57C01-2511-MI-000137

**RECOMMENDATION AND REPORT OF THE DEPARTMENT OF NATURAL
RESOURCES DIVISION OF WATER WITH RESPECT TO THE PETITION FOR
ESTABLISHMENT OF THE WEST LAKES CONSERVANCY DISTRICT IN NOBLE
COUNTY**

BACKGROUND

On November 25, 2025, under Case Number 57C01-2511-MI-000137 the Petition for the Establishment of the West Lakes Conservancy District (WLCD) was filed in the Noble Circuit Court. A copy of the Petition is attached hereto as Exhibit 6. The proposed WLCD will be located in Noble County, Indiana. The proposed boundaries consist of 539 freeholders with parcels that are around the West Lakes Chain that consists of Waldron Lake, Jones Lake, Steinberger Lake, Tamarack Lake and a portion of the immediate downstream riverbank that are outlined on the map in Exhibit H.

The West Lakes chain is in the St. Joseph HUC-8 04050001. According to the West Lakes Association, the West Lakes chain has approximately 453 acres of water comprised of Waldron Lake (216 acres), Jones Lake (114 acres), Steinberger Lake (73 acres), and Tamarack Lake (50 acres) (Exhibit 1). The lakes are connected via channels in Northern Noble County with the North Branch of the Elkhart River flowing through the lakes. Tamarack Lake outlets into Steinberger Lake which outlets into Waldron Lake. Jones Lake flows into Waldron Lake which flows into the North Branch of the Elkhart River (NBER). The West Lakes have an established legal lake level of 885.55 feet, M.S.L. There is a lake outlet structure (St. ID 57-15) located downstream of Waldron Lake and Duke Bridge on the North Branch of the Elkhart River. Based on a 1992 agreement between Indiana Department of Natural Resources and the West Lakes Association (WLA), WLA is responsible for maintaining the lake level by removing and replacing the stop logs.

According to Indiana Code (IC) 14-33-2-2, the Petition to establish must be signed by 30% or more of the freeholders owning land in the proposed WLCD. The proposed WLCD includes 539 freeholders with representatives from 210 signing the Petition (38.9%) according to the Affiant. The Petitioners also have satisfied the fifty-one percent 51% assessed valuation threshold required by IC 14-33-2-2(2) according to the Affiant.

Petitioners have shown that the threshold is met for the entire Conservancy District. The Noble Circuit Court found that the Petition conforms to the signatory requirements of Indiana’s Conservancy District Statute.

The Petition requests that the WLCD be established a Conservancy District for these purposes in IC 14-33-1-1:

- 1) Flood prevention and control
- 2) Improving drainage
- 3) Providing for irrigation
- 6) Developing forests, wildlife areas, parks, and recreational facilities if feasible in connection with beneficial water management
- 7) Preventing the loss of topsoil from injurious water erosion
- 9) Operation, maintenance, and improvement of:
 - a. a work of improvement for water-based recreation or
 - b. other work of improvement that could have been built for any other purpose authorized by this section.

Specifically, the Petition cites the following reasons for the establishment of the WLCD: in channel-vegetation control to prevent flood and to support recreational use, maintain current streams using best practices and strategic plantings or trees, maintain access roads during flooding events, education of benefits in participation in NFIP, prevent loss of topsoil/erosion by maintaining and /or engineering ditches, natural and historical flood storage and/or retention areas, encourage preservation of forests and recreational areas, promote securing propane tanks, engage elected officials to support Conservancy District efforts, and operate water level control facilities.

The referral from the Noble Circuit Court was processed as required by IC 14-33-2-17, IC 14-33-2-19, and Information Bulletin #36 (Eleventh Amendment), *Procedural Guidelines for the Interpretation of the Conservancy District Article*, DIN: 20220601-IR-31220180NRA (IB 36). Kristi Johnson was appointed as the Hearing Officer for the Division of Water and Isabella Foster served as the DNR Technical Reviewer.

The Division of Water held a public hearing on July 15, 2026 at the Noble County Library in Albion, IN. Comments were collected from the public and government organizations. A summary of the public hearing and comments may be found in Exhibit 7.

SUMMARY OF EVIENDECE SUBMITTED AS EXHIBITS

The following Exhibits were submitted by the Petitioners to the Noble Circuit Court as evidence in support on July 14, 2026:

Exhibit A	Nutrient and Sedimentation Plan for West Lakes
Exhibit B	Flood Mitigation through Downstream Management and Text of Flood Mitigation
Exhibit C	Presentation
Exhibit D	Conservancy Project List
Exhibit E	Support Letters
Exhibit F	Indiana Silver Jackets
Exhibit G	NBER Report
Exhibit H	Map of Proposed District

The following Exhibits were submitted by the Petitioners to the DNR as supporting documentation after the hearing:

Exhibit 1	Aquatic Vegetation Management Plan
Exhibit 2	Estimated Four-year District Budget
Exhibit 3	Purposes Project List
Exhibit 4	2026 Preliminary Budget for West Lakes Association
Exhibit 5	West Lakes DNR LARE Application

The following Exhibits are attached to this report:

Exhibit 6	Petition for the Creation of the West Lakes Conservancy District
Exhibit 7	Public Hearing and Comments Report
Exhibit 8	Comments from State Agencies
Exhibit 9	The News Sun Publisher's Claim

PROPOSED FINDINGS AND RECOMMENDATION

Under IC 14-33-1-1, a conservancy district may be established for any of the following purposes:

- 1) Flood prevention and control
- 2) Improving drainage
- 3) Providing for irrigation
- 4) Providing water supply, including treatment and distribution, for domestic, industrial, and public use.
- 5) Providing for the collection, treatment, and disposal of sewage and other liquid wastes
- 6) Developing forests, wildlife areas, parks, and recreational facilities if feasible in connection with beneficial water management
- 7) Preventing the loss of topsoil from injurious water erosion
- 8) Storage of water for augmentation of stream flow
- 9) Operation, maintenance, and improvement of:
 - a. a work of improvement for water-based recreation or
 - b. other work of improvement that could have been built for any other purpose authorized by this section.

Pursuant to IC 14-33-2-17, the Division's determination and recommendations to the Noble Circuit Court are limited to the following considerations:

1. Whether the proposed district appears to be necessary;
2. Whether the proposed district holds promise of economic and engineering feasibility;
3. Whether the proposed district seems to offer benefits in excess of costs and damages;
4. Whether the proposed district proposes to cover and serve a proper area; and
5. Whether the proposed district could be established and operated in manner compatible with established:
(A) conservancy districts; (B) flood control projects; (C) reservoirs; (D) lakes; (E) drains; (F) levees; and
(G) other water management or water supply projects.

1. It is unclear that the proposed district appears to be necessary

The Petition proposes the WLCD to be established for seven enumerated purposes, 1) Flood prevention and control, 2) Improving drainage, 3) Providing for Irrigation, 6) Developing forests, wildlife areas, parks, and recreational facilities if feasible in connection with beneficial water management, 7) Preventing the loss of topsoil from injurious water erosion, 8) Storage of water for augmentation of streamflow and 9) Operation, maintenance, and improvement of: a work of improvement for water-based recreation or other work of improvement that could have been built for any other purpose authorized by this section.

During the hearing, two submitted studies as exhibits focused on the West Lakes Chain, titled the “Indiana Silver Jackets North Branch Elkhart River West Lakes Task Team Report” (2010) (Exhibit F), and the “North Branch Elkhart River Corridor Flood Risk Management Plan” (2020) prepared for the St. Joseph River Basin Commission by Christopher B. Burke Engineering, LLC (Exhibit G). The findings of these studies were discussed throughout the July 15, 2026, public hearing during both professional and lay testimony and mentioned in public comments.

The 2010 Silver Jackets report (Exhibit F) identified long-term flooding concerns, emphasizing that the watershed has an abundance of natural storage through extensive wetland complexes and lake chains which has the ability to detain significant volumes of water for slower release. This reduces the peak elevation of flood waters in downstream channels, but flood flows may extend over longer periods of time. The report also identified a “transition area” of the NBER that is more than 3,000 feet long beginning more than 7,000 feet downstream of Dukes Bridge. The channel gradient and flow are very low in this area. The study recommended a range of non-structural flood resilience strategies including: strengthening floodplain management practices and ordinances, improving public education, participating in the National Flood Insurance Program, elevating or floodproofing vulnerable homes, preventing development in the floodplain, protecting existing natural flood-storage areas, enhancing regional coordination among counties, updating stormwater regulations, anchoring propane tanks and elevating wellheads in flood-prone areas, expanding monitoring networks, and hydrological data collection to guide future decision-making.

The 2020 flood risk management plan (Exhibit G) described the West Lakes Chain as part of a groundwater dominated lake and wetland system with extensive natural storage, noting increasing trends in days above legal lake level, especially over the past two decades. The study concluded that elevated lake levels were strongly influenced by climate-driven increases in precipitation, seasonal groundwater inflow, and the low-gradient transitional channel downstream of Waldron Lake. It further found that large structural solutions, such as construction of major upstream storage basins, would yield only modest reductions in flood elevations (approximately 3-6 inches) and were not cost-effective. The study concluded that “it is not likely feasible or cost-effective to try and significantly reduce flood problems for homes that were built in the floodplain by creating additional upstream storage, clearing the vegetation downstream of the system, or by more intensive means of increasing the outflow from lakes without creating negative impacts elsewhere.”

Purpose: Flood prevention and control under IC 14-33-1-1(a)(1)

Clearly defined specific activities related to the intent of this purpose were not identified within the Petition but presented in the exhibits and testimony during the public hearing on July 15, 2026. Both Exhibits F and G emphasize that flood prevention is necessary due to increasing trends in extreme rainfall, lake levels at increased height for longer durations, groundwater driven hydrology, and extensive natural storage areas that are already operating at capacity. These studies have documented that the West Lakes Chain has had multiple years with 250+ days of lake levels being a foot higher than the legal limit.

Proposed improvements from the Petitioners include systemic logjam removal using contractors rather than volunteers in the transition area downstream of the lakes system, native and nonnative aquatic vegetation treatment in the transition area, and coordination with local agencies on floodplain management practices to reduce long-term flood risk.

Petitioners emphasized that drainage performance is heavily affected by downstream obstructions

in the transition area between Duke's Bridge and Cosperville, where repeated logjams have occurred. Petitioners stated that the proposed WLCD would allow for professionals to be contracted to remove logjams rather than relying on volunteers and that it would be easier for a conservancy district to obtain easements to complete the work compared to a nonprofit.

The aquatic vegetation management plan prepared by Aquatic Weed Control (Exhibit 1) lists multiple intended targets of treatment including invasive plants Eurasian Watermilfoil (*Myriophyllum spicatum* L.) and Curly-leaf Pondweed (*Potamogeton crispus*). The native coontail (*Ceratophyllum demersum*) was also found to be prevalent but was not considered to be a main focus of treatment since DNR Lake and River Enhancement grants do not fund the treatment of native plants. It was expressed at the hearing that the Petitioners would like to treat all vegetation within the transition zone to help alleviate flooding despite Exhibits F and G cautioning the potential negative impacts from removing native vegetation.

Both Exhibits F and G clearly state that the proposed projects by the Petitioners including vegetation treatment, logjam clearing, and minor outlet improvements will not produce meaningful or sustained reductions in flood elevations or flood durations. Exhibit F states that in-channel aquatic vegetation does not appear to be a controlling factor during large flood events. Burke Engineering's watershed model (Exhibit G) showed that even large-scale structural projects, such as constructing multiple 300-acre upstream storage basins, would provide a modest reduction in flood stages by 3-6 inches and shorten flood durations by only 1-3 days, while vegetation clearing, woody debris removal, or outlet enhancements provide minimal seasonal benefit. The studies warn that attempting to increase surface outlet efficiency poses downstream risks, offers negligible improvements for moderate or large events, and fails to address the groundwater driven nature of the system. During Matt Meersman's public comment (Executive Director of the St. Joe River Basin Commission) he reiterated this point explicitly, stating that managing vegetation downstream "will not protect lives" and cautioning that expectations for significant flood-level reductions through such work are misplaced. Meersman also noted that the 2020 North Branch Study (Exhibit F) stresses the need for flood-resilience strategies tailored to specific geographic areas within the watershed, emphasizing that adaptation, not attempts to accelerate lake drainage, is the only scientifically supported path forward. He stated that while a locally led conservancy district could serve as an effective regional partner for implementing long-term resilience measures, such efforts must be grounded in best-available science rather than expectations that vegetation management or outlet work will resolve chronic high-water conditions.

It's important to note that Exhibit F explains that existing downstream structural features, specifically the dams at Benton and Goshen, have no impact on discharge flows from the North Branch Elkhart River and therefore do not influence lake levels on the West Lakes Chain. The Silver Jackets report (Exhibit F) also notes that previous debris and tree removal projects in the lower North Branch Elkhart River did not and will not provide a permanent solution to flooding on the West Lakes Chain, underscoring the limited effectiveness of these efforts. It further states that attempts to increase outflow from any lake in the basin could have adverse downstream consequences, meaning structural or capacity-based drainage modifications cannot resolve the underlying drainage limitations.

The studies (Exhibits F and G) emphasize that efforts should not be focus on 'draining the lakes faster' but instead on avoiding additional development in the floodplain and adopting long-term resilience strategies. This includes discouraging new development within the flood hazard area, preserving natural flood-storage areas, and prioritizing elevation, or voluntary buyouts of existing vulnerable homes rather than relying on drainage-based solutions. The Petitioners outlined measures that they would promote to the freeholders including anchor propane tanks located below the base flood elevation, elevate water well heads to above the base flood elevation, address flood

prone access roads, address flood prone access roads, and promote participation in the National Flood Insurance Program. It is unclear how WLCD would promote these and why a conservancy district is needed to promote these practices.

The proposed projects remain conceptual as no engineered designs, detailed costs, or implementation plan were included. Several proposed activities depend on future partnerships, professional contracting, or interagency coordination. The Petitioners acknowledge that these concepts would require refinement within a future District Plan.

The fact that there are few concrete or specific plans for development, especially plans that the WLCD specifically could or would help facilitate, makes it difficult to ascertain if the creation of the WLCD is necessary to accomplish this purpose.

Purpose: Improving drainage under IC 14-33-1-1(a)(2)

Clearly defined specific activities related to the intent of this purpose were not identified within the Petition, exhibits or testimony during the public hearing on July 15, 2026. This purpose was not discussed by the Petitioners and therefore unclear from the presented evidence if the proposed WLCD is necessary for this purpose.

Purpose: Providing for irrigation IC 14-33-1-1(a)(3)

Clearly defined specific activities related to the intent of this purpose were not identified within the Petition, exhibits or testimony during the public hearing on July 15, 2026. This purpose was not discussed by the Petitioners and therefore unclear from the presented evidence if the proposed WLCD is necessary for this purpose.

Purpose: Developing forests, wildlife areas, parks, and recreational facilities if feasible in connection with beneficial water management IC 14-33-1-1(a)(6)

Clearly defined specific activities related to the intent of this purpose were not identified within the Petition but presented in the exhibits and testimony during the public hearing on July 15, 2026. Exhibit D explains that loss of natural forests has reduced canopy cover and weakened natural watershed functions. The Petitioners in the hearing and Exhibits C and D proposed a few activities to address this purpose including reforestation, water-quality testing, and dredging, but details were limited. Reforestation activities outlined in Exhibit D include reforestation with ACRES Land Trust, local governmental agencies, conservation organizations, and willing property owners to reestablish native tree species. Wildlife-oriented improvements such as protecting or restoring natural flood-storage areas, enhancing riparian habitat, and long-term ecological restoration tied to beneficial water management were also discussed. Exhibits D and 2 did not have dedicated funding for reforestation in the proposed WLCD budget.

Exhibit D states the WLCD would conduct water quality monitoring for suspended solids, settleable solids, turbidity, nutrients, bacteria, and other contaminants. Exhibit 2 listed five sampling stations in different streams within the watershed for a projected cost of \$125,000. It is unclear if these locations would be in the boundaries of WLCD, who would be completing the work, and what they would be testing for and how often.

Exhibit D referenced additional maintenance the WLCD would undertake including dredging of lake-connecting channels when sediment build-up restricts recreational navigation, and periodic channel work to preserve public access and overall lake function. The Petitioners references a 2018 dredging report that showed significant need to dredge however that report was not provided. While these activities illustrate how the WLCD might operate and complete works of improvement, no formalized operational plans, detailed costs, or engineering documents were included except for an estimated dredging cost of \$2,000,000. The Petitioners acknowledged that

these concepts would require refinement with a future District Plan.

While these related activities were described during the hearing, no formalized implementation plan or detailed costs were included. Several proposed activities are conceptual, and others depend on landowner cooperation or local partnerships. The Petitioners acknowledged that these concepts would need further refinement within a future District Plan.

The fact that there are few concrete or specific plans for development, especially plans that the WLCD specifically could or would help facilitate, makes it difficult to ascertain if the creation of the WLCD is necessary to accomplish this purpose.

Purpose: Preventing the loss of topsoil from injurious water erosion IC 14-33-1-1(a)(7)

Clearly defined specific activities related to the intent of this purpose were not identified within the Petition but presented in the exhibits and testimony during the public hearing on July 15, 2026. Petitioners stated that upstream sediment and nutrient loading significantly contribute to erosion concerns within the watershed, particularly during large storm events but it is unclear to what extent this is occurring. The Petitioners proposed improvements in Exhibit D include upstream treatments like two-stage ditches, engineered sediment pits, and restoration of natural flood-storage areas to slow runoff, promote sediment deposition, and reduce downstream erosion.

The Noble County Surveyor, Randy Sexton, explained there are five drains leading into the West Lakes Chain. Three are regulated drains that deliver sediment and require ongoing maintenance from the Drainage Board. Sexton proposed a two-stage ditch on Boughey Ditch and in-stream detention basins on Gonser Drain, Gretzinger Ditch, Middle Branch of the Elkhart River, and the North Branch of the Elkhart River (Exhibit A). However, none of these proposed projects are located in the proposed WLCD boundaries except for the in-stream detention basin on Middle Branch of the Elkhart River. It is also unclear how effective these projects would be since no estimated sediment or nutrient load reduction calculations or other evidence was provided.

The studies submitted as Exhibits F and G explained that sediment basins would provide only modest reductions in sediment transport and would not significantly improve drainage or reduce flood impacts in a groundwater driven system like the West Lakes. Only one of the proposed sediment-basins is located within the proposed boundaries of the WLCD and installation costs of \$25,000 per basin is roughly half of the Petitioner's first year budget. The project would be financially disproportionate relative to the expected benefit. The core concept of the sediment basins is to intercept sediment before it reaches the lakes, yet none of the upstream areas where basins would be most effective fall within the WLCD boundaries, preventing meaningful implementation of this strategy.

Exhibit D claims the WLCD would map, protect, and restore historic flood-storage areas but states that most of the funding would need to come from external partnerships and grants. No specific locations or methods were identified.

The Petitioners discussed completing efforts to prevent sediment from entering the lake systems rather than solely relying on lake or downstream dredging. However, the proposed boundaries of the WLCD do not align with this goal since the upstream section of the river is not included and therefore it is unclear how establishing a conservancy district would address this purpose.

While these erosion-related activities were outlined conceptually during the hearing, no engineering designs, detailed cost estimates, or implementation plan were included. Many of the proposed activities depend on landowner cooperation or partnerships with local government entities. The Petitioners acknowledged that these concepts would require refinement within a

future District Plan.

Due to lack of providing evidence of current erosion issues, proposed projects not located within the boundaries, and lack of project details, it is unclear that the proposed WLCD is necessary for this purpose.

Purpose: Storage of water for augmentation of stream flow IC 14-33-1-1(a)(8)

Clearly defined specific activities related to the intent of this purpose were not identified within the Petition, exhibits or testimony during the public hearing on July 15, 2026. This purpose was not discussed by the Petitioners and therefore unclear from the presented evidence if the proposed WLCD is necessary for this purpose.

Purpose: Operation, maintenance, and improvement of: a work of improvement for water-based recreation or other work of improvement that could have been built for any other purpose authorized by this section.

IC 14-33-1-1(a)(9)

Clearly defined specific activities related to the intent of this purpose were not identified within the Petition but presented in the exhibits and testimony during the public hearing on July 15, 2026. A 1992 agreement between Indiana Department of Natural Resources and the West Lakes Association (WLA) outlines that WLA is responsible for maintaining the lake level by removing and replacing the stop logs. Testimony explained that the lake-level control structure requires seasonal installation and removal of heavy concrete stop-logs, a task that is currently performed by volunteers. The Petitioners stated that safety risks and inconsistent operation are a cause for concern. While it is undisputed that the lake-level control structure requires safe, consistent, and professional operation, the testimony raises a substantive question as to why the West Lakes Association could not reprioritize its existing budget to contract professional services for this task.

The Petitioners indicated the proposed WLCD would assume responsibility for this work by contracting trained professionals to ensure proper and safe operation of the structure for an estimated cost of \$1,200 a year (Exhibit 2).

While there is a need to maintain the stoplogs, it is unclear why the establishment of the WLCD is needed where there already exists a non-profit group with an estimated budget of \$14,000 a year (Exhibit 4) that is likely capable of raising funds to maintain the lake control structure in the proposed district.

Conclusion: The four of the Petitioners' seven purposes of flood prevention and control, preventing topsoil loss, developing forests and wildlife areas, and supporting the operation and maintenance of works of improvement that is built for any other purpose authorized by this section appears unclear to be necessary.

Providing irrigation, improving drainage, and augmentation of streamflow do not appear necessary for the conditions described in the West Lakes chain due to a lack of information. The studies submitted provide a strong background and clear summary of the longstanding watershed issues; however, documentation is insufficient to fully support the Petitioners' claims that the District can or should successfully implement and sustain the identified projects.

Overall, it is unclear that the proposed WLCD is necessary for the purposes stated in the Petition.

2. It is unclear that the proposed district holds promise of economic and engineering feasibility

The presented evidence regarding the economic and engineering feasibility of the proposed WLCD does not make a clear case in favor of the proposed district. Regarding the proposed purposes by the Petition, aside from blanket

testimonial statements that the WLCD would hold the promise of economic and engineering feasibility, no specific evidence, reports, or plans were entered into the record to support the idea that the creation of the WLCD would hold the promise of economic and engineering feasibility. The lack of evidence regarding specific development plans makes it difficult to determine the promise of economic and engineering feasibility as there are no specific projects to examine.

Petitioners provided three different proposed budgets in Exhibits D, 2, and 3 that sometimes had different project costs and were vague on details. For example, the estimated cost for in-channel aquatic vegetation control was \$20,000 a year in Exhibit D and \$9,000 a year in Exhibits 2 and 3. Dredging to maintain lake connections was budgeted \$10,437 a year in Exhibit 3, \$10,000 a year in Exhibit D, and \$2 million total in Exhibit 2. Water testing was budgeted for \$2,800 a year but is unclear if that is an appropriate amount due to lack of detail of how many sites, how often sites would be monitored, and what parameters. Overall, the budgets should be more consistent and provide additional details on what the costs would entail.

Conclusion: It is unclear that the proposed WLCD holds promise of economic and engineering feasibility.

3. It is unclear that the proposed district seems to offer benefits in excess of costs

The proposed WLCD does not appear to offer benefits in excess of costs. The submitted studies consistently state that the projects identified by the Petitioners would not produce meaningful long-term improvements. While the Petitioners' intentions reflect a sincere desire to help their community, the technical evidence demonstrates that vegetation management, logjam removal, and limited sediment control projects do not address the underlying causes of flooding or erosion in a groundwater-driven watershed. Both reports (Exhibits F and G) conclude that these activities cannot significantly reduce flood elevations or durations and may create adverse downstream impacts. Given their modest, expected effectiveness, the costs associated with these projects may not justify implementation. Efforts should be redirected to flood resilient strategies.

The lack of specific, detailed development plans hinders the ability to assess any proposed costs and prospective damage. Several long-term costs were not projected in the submitted evidence beyond some testimony to the general belief that the benefits brought by establishing the district would outweigh future costs and damages. This lack of clarity and specific examples makes it nearly impossible to determine how the district's benefits would be in excess of immediate and long-term costs and damages.

Conclusion: It is unclear that the proposed WLCD would offer benefits in excess of costs and damages.

4. Proposes to serve the public health

None of the proposed purposes apply to IC 14-33-2-1(c)(4).

5. It appears that the proposed district does not cover and serve a proper area

The stated intent from the Petitioners is to include properties that substantially benefit from lake management and downstream activities. The proposed boundaries appear inconsistently drawn and do not reliably reflect the areas that influence or are affected in the watershed.

Exhibit D asserts that the district encompasses properties susceptible to flooding and high-water events, but many included parcels lie outside flood-prone areas while more hydrologically influential upstream lands remain entirely excluded. Exhibit D further indicates that the proposed boundaries were developed using watershed function, flood risk, and hydrologic conditions, yet the actual boundary configuration contradicts these principles by excluding parcels where proposed sediment traps should be located and by extending downstream to properties where the stated management activities provide little direct benefit.

The proposed boundary line (Exhibit H) does not follow parcel boundaries and, in several cases, cut through individual parcels rather than encompassing them entirely, creating uncertainty regarding jurisdiction and benefit. The Petitioners stated at the hearing that a 0.25 mile buffer from the waterfront was used to determine which parcels are in the conservancy district but that appears to be inconsistent. There are parcels that are included despite not touching the river and some parcels that are within the buffer are included while others were not. Despite the Petitioners stating the importance of reducing the among of sediment and nutrients from entering the lakes system, upstream areas were not included despite including downstream areas. Additionally, three of the proposed sediment basins and the two-stage ditch project do not lie within the proposed boundaries.

Conclusion: These inconsistencies, combined with the omission of upstream areas where best management practices should occur, make it appear that the proposed WLCD does not cover and serve a proper area. It is difficult to determine whether the proposed WLCD effectively encompasses the properties that both receive substantial benefit and most directly influence the watershed.

6. It is unclear that the proposed district could be established and operated in a manner compatible with established Conservancy Districts, flood control projects, reservoirs, lakes, drains, levees, and other water management or water supply projects

The Indiana Department of Environmental Management mentioned there is an existing West Lakes rural sewer district that should be compatible with the proposed District and if established, WLCD should coordinate with the existing West Lakes rural sewer district. The Noble County surveyor spoke on behalf of the Petitioners during the hearing so it is assumed that the Noble County drainage board would be compatible with working with the proposed WLCD. The Rome City Town Manager provided a letter of support which is located upstream of the proposed WLCD boundaries. The Saint Joseph River Basin Commission provided a letter of support for the proposed WLCD, but the executive director of the Commission expressed concerns with some of the proposed activities during the public hearing.

Given the lack of specific development plans and the inability to determine accurate future costs and impacts of the proposed WLCD, it is difficult to ascertain whether the proposed WLCD could be established and operated in a compatible manner with other established watershed management and flood control or reduction projects.

Conclusion: It is unclear that the proposed WLCD could be established and operated in a manner compatible with established conservancy districts, flood control projects, reservoirs, lakes, drains, levees, and other water management or water supply projects.

OVERALL RECOMMENDATION

The lack of specific, detailed development plans hinders the ability to assess that the proposed District favorably answered the questions from IC 14-33-2-17 and therefore does not recommend the establishment of the proposed WLCD.

If there are questions concerning the above report, please contact Isabella Foster, Water Planner, at 317-232-1507.



Recoverable Signature

X David Knipe

David Knipe, P.E., CFM
Division of Water Director
Signed by: David Knipe

Division of Water
402 West Washington Street Room W264

Indianapolis, IN 46204

Noble Circuit Court

STATE OF INDIANA)
) SS:
COUNTY OF NOBLE)

IN THE NOBLE CIRCUIT COURT

IN RE: ESTABLISHMENT OF)
WEST LAKE CONSERVANCY)
DISTRICT)

CAUSE NO. _____

**PETITION FOR THE CREATION OF THE
WEST LAKE CONSERVANCY DISTRICT**

We, the undersigned, freeholders of Noble County, Indiana, and each and all of us being freeholders of the land included in the boundaries described in Paragraph II of this Petition, desire the establishment of a Conservancy District under and pursuant to "an Act Relating to Conservancy Districts," being Chapter 308, Indiana Acts of 1957 as amended and supplemented from time to time; and currently codified at IC 14-33; and we hereby petition the Noble County Circuit Court of Noble County, Indiana, to order its establishment in accordance with the provisions of said Act, as amended and supplemented, according to the facts and provisions hereinafter set forth.

I. The name of the conservancy district shall be West Lakes Conservancy District.

II. The territory to be included lies generally in its entirety within the County of Noble, Indiana, as is more particularly described as follows:

A parcel of real estate which is identified in Exhibit "A" which is attached hereto and made a part of this petition in its entirety.

III. Said Conservancy District shall be established for the purposes of providing for flood prevention and control and improving drainage through implementation of strategies to maintain, repair pursuant to IC 14-33-1-1 but also for any purposes of: (1) Flood prevention and control; (2) Improving drainage; (3) Providing for irrigation; (4) Developing forests, wildlife areas, parks, and recreational facilities if feasible in connection with beneficial water management; (5) Preventing the loss of topsoil from injurious water erosion; (6) Storage of water for augmentation of stream flow; (7) Operation, maintenance, and improvement of: (A) a work

of improvement for water based recreational purposes; or (B) other work of improvement that could have been built for any other purpose authorized by this section.

IV. Specifically, the necessity and reasons for the establishment of the district are as follows:

1. In channel-vegetation control to prevent flood and to support recreational use.
2. Maintain current streams using best practices and strategic plantings or trees.
3. Maintain access roads during flooding events.
4. Education of benefits in participation in NFIP
5. Prevent loss of topsoil/erosion by maintaining and/or engineering ditches, natural and historical flood storage and/or retention areas.
6. Encourage preservation of forests and recreational areas.
7. Promote securing propane tanks.
8. Engage elected officials to support conservancy district efforts.
9. Operate water level control facilities.

V. In addition to the above reasons, the establishment of the district will promote the general health, safety and welfare of the area as well as surrounding communities.

VI. The cost and damages of the district will be less than the beneficial value to the residents and territories involved.

VII. This Petition is not conditioned upon the award of any particular federal or state grant.

VIII. All conditions attached to any federal and/or state aid are acknowledged to be acceptable to the individual property owners if and as required by the federal and/or state government as conditions of any grant award or participation in project funding.

IX. It is anticipated that maintenance and operation of any works of improvement constructed and operated by the proposed conservancy district will be funded by a combination of user charges as well as potential assessment of special benefit taxes and possible exceptional benefit taxes as such may be determined appropriate from time to time by the Board of Directors and which are consistent with the laws of the State of Indiana.

X. Seven (7) directors shall be appointed to serve on the Board of Directors. Representation on the board may be designated further by area or as otherwise established by the circuit court. After the initial appointment, the election shall be by those individuals legally entitled to vote. The qualifications for and length of terms of each director shall be determined by the law in effect at the time of the creation of the conservancy district and as such requirements may be amended from time to time.

XI. Upon creation of the conservancy district, the Noble County Superior Court will be asked to divide the conservancy district into subdistrict areas which must be equal to the number of members of the Board of Directors.

David C. Winick Dave Winick 9510 N. Steinbarger Lake Rd Wawaka
(signature) (printed) Address
Freeholder's Name

Mike Dail Mike Dail 9530 N. STEINBARGER LAKE RD WAWAKA
(signature) (printed) Address
Freeholder's Name

Gordon Lewis Gordon + Nancy Lewis 9544 N. Steinbarger Lake Rd Wawaka
(signature) (printed) Address
Freeholder's Name

S. Coake SUSAN COAKE 9567 N. Steinbarger Lake
(signature) (printed) Address
Freeholder's Name Wawaka, IN 46794 Dr.

Barbara A. Brose Barbara A. Brose 9464 N. Steinbarger Lk. Rd.
(signature) (printed) Address Wawaka IN 46794
Freeholder's Name

John Stroup John Stroup 9672 N. Steinbarger Wawaka IN 46794
(signature) (printed) Address
Freeholder's Name

Lisa Johnston Lisa Johnston 9680 N. Steinbarger Lake Dr.
(signature) (printed) Address Wawaka IN 46794
Freeholder's Name

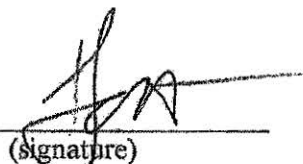
Charles Vice Charles Vice 9662 N. Steinbarger Lake Wawaka 46794
(signature) (printed) Address
Freeholder's Name

Ann Polanco Ann Polanco 9600 N. STEINBARGER Wawaka 46794
(signature) (printed) Address
Freeholder's Name

Thomas Barton Thomas Barton 9474 N. Steinbarger Rd
(signature) (printed) Address
Freeholder's Name

Marietta M. Jenkins M McJunkin 9416 N Steinbarger Tr Rd
(signature) (printed) Address
Freeholder's Name

Gregory A. Gregory Gregory A. Gregory 9624 N. Steinbarger Lake Rd
(signature) (printed) Address Wawaka, IN 46794
Freeholder's Name



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Freeholder's Name

Thomas Jacko 9634 N. Steinbarger

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Address

Wawakea IN



(signature)

Freeholder's Name

Cordell Hoover 9520~~W~~ W Steinbarger

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Address

Wawakea



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Freeholder's Name

Mark Dannon 119 E Sunny Acres Rome City 46784

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Address

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VERIFYING AFFIDAVIT

COUNTERPART NO. 1

STATE OF INDIANA)
) SS:
COUNTY OF NOBLE)

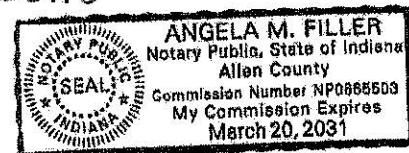
IN THE NOBLE CIRCUIT COURT

Cheryl Lynn Coons, being first duly sworn, upon his/her oath deposes and says:

That he/she circulated the attached counterpart of the Petition for Establishment of the West Lake Conservancy District under and pursuant to "an act relating to conservancy districts", being Chapter 308, Indiana Acts of 1957 as amended and supplemented from time to time and currently codified as IC 14-33; that all of the signatures appearing on the attached counterpart of said petition were affixed in his/her presence and are the true and lawful signatures of the persons signing said counterpart.

Cheryl Lynn Coons
Cheryl Lynn Coons

STATE OF INDIANA)
) SS:
COUNTY OF Noble)



Subscribed and sworn to before me this 18th day of September, 2025.

Angela M. Filler
Notary Public

My Commission Expires:
Resident of Noble County, Indiana

August 24, 2026

PUBLIC HEARING AND COMMENTS REPORT

1. Advertising

In accordance with Indiana Code (IC) 14-33-2-21 and Information Bulletin #36, on July 17, 2026, the Division of Water circulated letters to state and local governmental entities that potentially have administrative jurisdiction over one or more of the purposes for which the West Lakes Conservancy District (WLCD) is proposed to be established. The state agencies from which technical assistance was requested include Indiana Department of Environmental Management, Indiana Department of Agriculture, Indiana Department of Local Government Finance, Indiana Finance Authority, Indiana Utility Regulatory Commission, and Indiana Department of Health. County and local governmental entities that were contacted to provide input included: Noble County (Commissioners, Council, Surveyor, Soil and Water Conservation District, Emergency Management Agency, MS4 Coordinator, and Health Department).

The Division of Water scheduled a public hearing on July 15, 2026, to allow the Petitioner to provide evidence concerning the establishment of the WLCD and for any interested person the right to be heard. As required by IC 14-33-2-19(b), a notice of the public hearing was published on June 30, 2026, in The News Sun, a newspaper of general circulation in Noble County (Exhibit 9). No informal preconference was requested.

2. Public Hearing

The Division of Water held the public hearing as scheduled on July 15, 2026, at 11am ET to 2pm ET, at Noble County Public Library Albion, Cole Room at 813 E Main St, Albion, IN 46701. Every member of the public who wanted to comment had the right to be heard; therefore, a second public hearing was unnecessary. The public hearing was recorded and the recording placed on the Division of Water Conservancy District webpage.

Division of Water staff Kristi Johnson served as the Hearing Officer and opened the public hearing as scheduled on July 15, 2026, to receive evidence and public comments on the proposed WLCD as required by IC 14-33-2-19(a). Isabella Foster appeared on behalf of the Division of Water and Mr. Colby Barkes represented the Petitioners at the meeting.

Approximately fifty-five persons attended the public hearing. Johnson provided an overview of the Division's responsibilities regarding the review of the Petition and announced that Mr. Barkes would present additional evidence and offer testimony from witnesses on behalf of the WLCD.

The Petitioners' attorney, Colby Barkes, presented evidence in support of the Petition and offered testimony from five witnesses. Each witness's testimony is summarized below. Public comments from those opposed to the WLCD were accepted first followed by comments in favor. The meeting was concluded after all attendees were provided an opportunity to comment. The Division also received public comments that were emailed to the Division before July 29, 2026. At the public meeting, Johnson announced the date of the Natural Resources

Commission meeting at which the factfinding report would be presented on September 15th, 2026, at The Garrison in Fort Harrison State Park, Indianapolis IN. Instructions on where to find the meeting information on the Natural Resources Commission's website were provided.

3. Summary of Evidence Received from Petitioner at Public Hearing

I. Petitioner's Presentation in Support of Establishment

Attorney Colby Barks, counsel for the Petitioners, explained that the purpose of the proposed Conservancy District is to provide the only viable long-term structure capable of addressing persistent and well-documented flooding challenges across the West Lakes chain. He emphasized that multiple studies, including the Silver Jackets report (Exhibit F) and the North Branch Elkhart River report (Exhibit G), establish a clear history of recurring flood events and identify the need for continuous, coordinated watershed management. He described current mitigation efforts undertaken by the West Lakes Association, including annual installation and removal of seasonal stoplog structures and volunteer-led vegetation and logjam clearing, noting that these efforts rely heavily on aging volunteers and are not sustainable. Barks stated that a Conservancy District would provide statutory authority, predictable funding, and access to grants needed to implement long-term flood-control measures, conduct sediment management, coordinate with regulatory agencies, and maintain lake level infrastructure. He further described how the proposed boundaries were designed to encompass the areas most directly affected by flooding and most dependent on water-management operations. He stressed that no other governmental entity is addressing these watershed issues and that the Conservancy District offers a limited-purpose, community-led solution consistent with statutory requirements.

Representative David Abbott, speaking from his experience as both a long-time resident of Sylvan Lake and former board member of the Rome City Conservancy District, provided testimony supporting formation of the district. He recounted the severe dam-related flooding emergency at Sylvan Lake, which required immediate lake-level drawdown and ultimately led to creation of a conservancy district as the only practical solution. He explained that a conservancy district enabled coordinated maintenance, hydrologic studies, emergency planning, and access to significant state and federal funding, including multimillion-dollar support for dam repairs. Abbott described how comparable watershed conditions affect the West Lakes chain, citing major contributions of upstream runoff, increasing storm intensities, and the expanding presence of hard surfaces throughout the watershed. He emphasized that flood-related challenges will worsen over time without local funding mechanisms, and he stated that the Conservancy District model provides a proven and durable structure for managing watershed-scale issues, protecting property values, and improving long-term lake health.

Randy Sexton, the Noble County Surveyor presented a technical assessment of sediment transport, inlet conditions, downstream velocities, and vegetation management needs. He outlined five primary inflow points to the lake chain, including three regulated drains and two unregulated tributaries, and described how increasing sediment loads and reduced flow velocities have contributed to recurring flooding and declining water quality. Sexton explained that conventional sediment-removal methods within the lakes are costly and less effective than upstream sediment-capture strategies. He detailed a proposed plan for WLCD involving installing a two-stage ditch, four in-channel sediment basins, cooperative maintenance with the drainage board, and annual vegetation and woody debris removal in the downstream transition area. Sexton stressed that maintaining downstream velocity is critical to efficient outflow and noted that volunteer-driven vegetation clearing, though helpful, is inconsistent and insufficient. He testified that coordinated efforts between the Conservancy District and the county would enable systematic maintenance, long-term sediment management, and improved hydraulic performance throughout the watershed.

Paul Veldman, a member of the West Lakes Association and the steering committee, provided an overview of how the proposed Conservancy District satisfies statutory requirements. He explained that decades of studies consistently identify the same watershed challenges, yet no entity exists to implement recommendations or manage long-term solutions. Veldman described the district's comprehensive management strategy, including

reactive, preventative, and restorative components, and stated that a permanent organization is required to coordinate these responsibilities. He reported that the proposed tax structure equates to an average of one hundred and sixteen dollars per freeholder under current assessments and would generate reliable local revenue that could be paired with grants and technical assistance. Veldman stated that the district boundaries reflect hydrologic conditions, flood impacts, and proximity to the river and lakes. He concluded that the district offers necessary structure, feasible engineering strategies, and benefits that exceed anticipated costs, while ensuring compatibility with local agencies.

Dan Lash, representing the steering committee, discussed the history and effectiveness of vegetation and obstruction removal in the downstream transition area between Dukes Bridge and Cosperville. He explained that for decades local residents and, previously, county-funded crews have removed fallen trees and vegetation to maintain flow capacity, and he described the dramatic improvements in outflow rates following vegetation-control treatments. Lash presented U.S. Geological Survey flow-rate data showing that downstream vegetation treatment can triple flow volume within days, greatly reducing the severity of flood events. He noted that since consistent weed-control efforts began in 2018, the lakes have not experienced a major flood of the magnitude seen in earlier years. Lash emphasized that these results demonstrate the effectiveness of targeted vegetation control but also highlighted that volunteer-based labor is unsustainable due to aging membership, physical risk, and inconsistent participation. He stated that a Conservancy District would provide reliable funding to hire professionals and ensure that essential flood-control activities continue.

Jim Donahoe, representing Aquatic Weed Control, provided professional insight into aquatic vegetation management and its role in maintaining adequate outflow. He clarified that if WLCD was established, all vegetation, including natives, in the “transition zone” would be treated. He explained that downstream vegetation blockages function like a clogged bathtub drain, causing water levels to rise across the lake chain. Donahoe described how his team surveys vegetation, identifies invasive and native species, and performs targeted treatments under appropriate flow conditions. He explained that native vegetation, which constitutes the majority of downstream blockages, is not eligible for state funding and regenerates quickly, often requiring multiple treatments per season. He outlined the costs associated with vegetation management and noted that sustained funding is required to maintain the channel effectively. Donahoe’s testimony supported the petitioners’ position that formal governance and funding are necessary to maintain downstream hydraulic capacity and prevent severe flood impacts.

4. Comments from State Agencies, Other Governmental Entities, and Members of the Public

I. State Agencies

Emily Faust, Regional Sewer District Coordinator responded on behalf of IDEM’s Office of Water Quality on May 26, 2026, stating that the West Lakes Regional Sewer District (RSD) provides sewer service to a portion of the area within the potential District. She further discussed it would be a good opportunity for collaboration between the RSD and potential District.

Beth Helene, General Counsel for the Indiana Utility Regulatory Commission (IURC), stated on August 18, 2026, that IURC staff see no conflicts created with the utilities the IURC regulates, and do not have any concerns about the proposed conservancy district.

II. Other Governmental Entities

Zachary Smith, Noble County Highway Director, spoke at the public hearing. He stated that the Highway Department is neutral and that they are there to serve the public. Smith commented on how the department has been working on replacing or repairing the bridges downstream of the West Lakes chain to reduce obstructions and how they react to flooding events.

Matt Meersman, Director of the St. Joseph River Basin Commission, stated in his submitted letter (Exhibit E) and comments at the public hearing that a locally led Conservancy District aligns with regional watershed-management priorities identified in both the Silver Jackets report and the 2020 North Branch study. He stated that managing vegetation downstream “will not protect lives” and cautioned that expectations for significant flood-level reductions through such work are misplaced. Meersman also noted that the 2020 North Branch Study (Exhibit G) stresses the need for flood-resilience strategies tailored to specific geographic areas within the watershed, emphasizing that adaptation, not attempts to accelerate lake drainage, is the only scientifically supported path forward. He explained that such a district would be capable of implementing localized projects, coordinating with regional agencies, and advancing recommendations related to vegetation management, sediment reduction, and watershed-level resilience planning. Meersman emphasized that while the district cannot eliminate flooding entirely, it can meaningfully improve water-level management and reduce the duration of high-water events through consistent maintenance and professionalized operations.

III. Members of the Public

Comments in Favor of the West Lakes Conservancy District:

Supporters of the conservancy district emphasized the chronic and severe nature of flooding across the West Lakes chain, recounting previous events that isolated residents, damaged homes, and hindered emergency response access. Many described decades of repeated studies identifying sedimentation, excessive vegetation, impaired drainage, and lake-level management challenges, noting that no entity currently holds the authority or stable funding needed to implement the recommended solutions. They stressed that nearly all flood-mitigation efforts such as log-jam removal, aquatic vegetation treatments, and seasonal stop-log operations are presently completed by aging volunteers or through unstable donations. Supporters argued that a conservancy district would establish a reliable funding mechanism to hire professionals, maintain downstream flow paths, coordinate with county and state agencies, pursue grants and loans, plan long-term watershed resilience, and make it easier to secure access for projects. Several highlighted that the district could provide consistent management of lake levels, protect recreational use, reduce property damage risk, improve water quality, and preserve economic and community value. They contended that without a formal district, essential maintenance will become unsafe or unsustainable, leaving the lakes and downstream communities vulnerable to increasing flood-related impacts.

Comments Neutral to the West Lakes Conservancy District:

Neutral commenters generally offered clarifications regarding taxation procedures, drainage roles, transportation infrastructure, or technical feasibility without taking a definitive position. County officials explained how property assessments, tax rates, and billing processes function, noting that certain publicly circulated statements had inaccurately described assessor responsibilities. Highway department representatives described ongoing bridge replacements and flood-response work within their jurisdiction, affirming willingness to coordinate regardless of petition outcome. Some commenters highlighted engineering realities associated with sediment basins, two-stage ditches, and long-term watershed maintenance, noting that such measures require significant land area, cooperative landowner participation, and sustained funding to remain effective. Others acknowledged that while vegetation management can accelerate outflow and shorten flood duration, it cannot eliminate watershed-scale flood risks entirely. Neutral commenters focused primarily on ensuring the Commission has accurate, realistic, and complete information when evaluating necessity, feasibility, and boundary appropriateness.

Comments Opposed to the West Lakes Conservancy District:

Commenters opposing the conservancy district raised concerns regarding taxation, property rights, easements, and the perceived lack of a clear, fully defined project plan. Many expressed worry that assessments based on rising property values would impose significant financial burdens, particularly on fixed-income households or landowners located far from the lakes who do not directly benefit from recreational access or lake-level

management. Several downstream and upland residents stated that watershed-level flooding is inherent to natural floodplain conditions and influenced by historic river modifications, suggesting that proposed projects such as sediment basins, ditch modifications, or drainage interventions may be insufficient, unproven, or potentially detrimental to properties. Numerous individuals objected to the district's statutory authority to acquire easements or exercise eminent domain, viewing such powers as threats to long-held agricultural or private land rights. Some commenters expressed procedural concerns, stating that portions of the petition process or public information had been misleading or incomplete. Others questioned whether a small tax district could meaningfully address watershed-scale issues already involving multiple federal, state, and local agencies. Overall, opponents characterized the proposed district as financially risky, overly expansive in authority, and lacking clarity regarding long-term obligations and benefits.

Exhibit 8
Comments from State Agencies

STATE of INDIANA

INDIANA UTILITY REGULATORY COMMISSION
101 WEST WASHINGTON STREET, SUITE 1500 EAST
INDIANAPOLIS, INDIANA 46204-3419



www.in.gov/iurc
Office: (317) 232-2701
Facsimile: (317) 232-6758

August 18, 2026

Isabella Foster
Indiana Department of Natural Resources
Division of Water
402 W. Washington Street, Room W264
Indianapolis, IN 46204

RE: Proposed Establishment of the West Lake Conservancy District,
Noble County, Indiana

Dear Ms. Foster:

The Office of General Counsel and the Water/Wastewater Division (together "IURC Staff") of the Indiana Utility Regulatory Commission ("IURC") have reviewed the Petition for Establishment of the West Lake Conservancy District. IURC Staff sees no conflicts created with the utilities the IURC regulates, and we do not have any concerns with the proposed establishment of this conservancy district.

Should you have questions, comments, or require additional information, please do not hesitate to contact me at (317) 232-2092.

Thank you.

Sincerely,

A handwritten signature in black ink, reading "Beth E. Heline". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Beth E. Heline
General Counsel

cc: Marcus Turner, Director, IURC Water/Wastewater Division

From: [Faust, Emily E](#)
To: [Foster, Isabella C](#)
Subject: Re: DNR DOW Requests Comments - IDEM RSD
Date: Wednesday, August 12, 2026 12:38:19 PM
Attachments: [West Lakes RSD Questionnaire 2026.pdf](#)
[West Lakes RSD area.pdf](#)
[Outlook-rwop2d35.png](#)
[Outlook-ketq3hz1.png](#)

Good afternoon,

I've been reviewing the formation documents and wanted to make you aware of the existing West Lakes RSD that provides sewer service to a portion of the Wawaka and Rome City in Noble County, this includes some areas of West Lakes (see attached map). If not already discussed by the potential CD, this could be a good opportunity for collaboration between the RSD and potential CD. I've attached an overview of the RSD's operations that has some contact info.

Thanks!



Emily Faust
OWQ NPDES Municipal / RSD Coordinator
(317) 232-5727 | efaust@idem.IN.gov
idem.IN.gov

From: Foster, Isabella C <IsFoster@dnr.IN.gov>
Sent: Friday, July 17, 2026 9:26 AM
To: Faust, Emily E <EFaust@idem.IN.gov>
Subject: DNR DOW Requests Comments - IDEM RSD

Good Morning,

The Department of Natural Resources Division of Water has received a petition for the establishment of West Lake Conservancy District and is requesting your assistance in its review. The Petition proposes the WLCD to be established for following legislated purposes: 1) Flood prevention and control, 2) Improving drainage, 3) Providing for irrigation, 6) Developing forests, wildlife areas, parks, and recreational facilities if feasible in connection with beneficial water management 7) Preventing the loss of topsoil from injurious water erosion, 9) Operation, maintenance, and improvement of a work of improvement for water-based recreation or other work of improvement that could have been built for any other purpose authorized by this section. I have attached a letter and [a shared file with related documentation](#) for your consideration and will factor your comments in our fact-finding report that will be presented to the Natural Resources Commission. Please forward any comments

you may have by August 19th, 2026.

Thank You,

Isabella Foster

Water Planner II

Indiana Department of Natural Resources

Division of Water

317-232-1507

IsFoster@dnr.IN.gov

www.dnr.IN.gov

Please let us know about the quality of our service by taking this brief [customer survey](#).