



Division of Water
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Indiana Department
of Natural Resources

Mike Braun, Governor
Alan Morrison, Director

Date: January 7, 2026

To: Natural Resources Commission

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

Re: Petition for the Establishment of the Geist Reservoir Conservancy District
Cause No. 29D05-2410-MI-011775

**RECOMMENDATION AND REPORT OF THE DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WATER WITH RESPECT TO THE PETITION FOR ESTABLISHMENT OF THE
GEIST RESERVOIR CONSERVANCY DISTRICT IN HAMILTON COUNTY**

Section A: Petition

On October 18, 2024, under Cause Number 29D05-2410-MI-011775 the Petition for the Establishment of the Geist Reservoir Conservancy District (GRCD) sponsored by the Geist Lake Coalition was filed in the Hamilton County Superior Court. A copy of the Petition is attached hereto as Exhibit A. The proposed GRCD will be located in Hamilton, Hancock, and Marion Counties, Indiana. The Petition states the territory will include all waterfront parcels on Geist Reservoir, and all areas of Geist Reservoir, with the dam as the southwest boundary and Florida Road as the northeast boundary. Most parcels in the proposed district are residential with single family homes and comprise of 1,182 freeholders.

On November 20, 2024, Marina Limited Partnership (Marina) requested leave to intervene in this matter. All parties appeared for an initial hearing on December 17, 2024. At that initial hearing, the Court raised some questions regarding the Petition. On April 8, 2025, Marina II Corporation (Marina II) requested to join as a party to these proceedings. On April 9, 2025, Petitioners filed a Motion for Leave to Amend Exhibit C to the Petition to include additional freeholders and filed affidavits confirming the official capacities of individuals who signed the Petition on behalf of trusts, corporations, or limited liability companies that are the freeholders of record. The Court granted Petitioner's Motion on April 10, 2025, and Petitioner's Amended Exhibit C to the Petition was filed on April 10, 2025.

Marina Limited Partnership and Marina II Corporation (Remonstrators) argued that the original Petition did not bear the necessary signatures required by Indiana Code (IC) 14-33-2-16, that any post-hearing amendments to establish the necessary signatures are not legally permitted, any new signatories may not be included, and that non-individual freeholders must be excluded from consideration. Remonstrators concludes that once the new signatories and non-individual freeholders are excluded from consideration that the Petition fails to satisfy the percentage of assessed value requirements of IC 14-33-3-1 for both Indianapolis and Fishers. The Court found the Petition conformed to the requirements of the Indiana's Conservancy District and Reservoir Conservancy

District Statute and denied the Remonstrator's motion to dismiss. On October 14, 2025, the Honorable David Najjar, Judge, Hamilton Superior Court 5, deemed the petition complete as to form and content and issued an order referring the Petition to the Indiana Department of Natural Resources Division of Water (Division).

The proposed Geist Reservoir Conservancy District is in Hamilton, Hancock, and Marion counties with the majority of the land residing in Hamilton County. The Geist Reservoir/Upper Fall Creek Watershed (10-digit HUC 0512020108) is located in Central Indiana, northeast of Indianapolis in Henry, Madison, Delaware, Hancock, Hamilton, and Marion Counties. Originating in northwest Henry County, Fall Creek flows southwest through Madison, Hamilton, and Marion Counties, with tributaries in portions of Delaware and Hancock Counties. The Geist Reservoir/Upper Fall Creek Watershed consists of approximately 140,194 acres of mixed land-use with Geist Reservoir occupying 1,900 acres itself. Geist Reservoir Dam is located at the lake's southern end. Fed by Fall Creek on the north, the lake overflow is directed into the creek again at the south. The earthen dam is 40 feet (12 m) high, with an overall length of 1,900 feet (580 m).

The planning for Geist Reservoir began in early 1913, due to hydraulic engineers estimating that White River and Fall Creek would not meet the needs of Indianapolis. Clarence H. Geist, a former owner of Indianapolis Water Company, initially bought around 5,000 acres in the Fall Creek Valley area in the 1920's & 1930's for the reservoir. The small village of Germantown was in the proposed area for the reservoir and when the dam was completed the town was flooded and now lays at the bottom of the lake. The reservoir was completed in 1943 and began supplying Indianapolis with water, and in the 1950's it was proposed to build a commercial and residential development in the area surrounding the reservoir. In the 1970's there was a proposal to triple the size of the reservoir, but it was defeated by the growing commercial and residential area. In 2011 Citizens Energy Group bought the reservoir and the dam.

Geist Reservoir has experienced increased problems with invasive aquatic plants and algal blooms in the past decades. The Geist Lake Coalition has taken steps over the years to treat the lake with fundraising and donations. The petition for the GRCD is sponsored by the Geist Lake Coalition, a 501(c)(3) organization which was formed in 2000 with the mission of addressing and upholding the longevity of the reservoir. During the summer of 2007, the reservoir suffered a toxic blue-green algal bloom. That event caused the formation of Geist Watershed Alliance which focuses on the long-term improvement and protection of Geist Reservoir's water quality.

According to IC 14-33-2-2, the petition to establish must be signed by 30% or more of the freeholders owning land in the proposed GRCD. The Petition states that the proposed GRCD includes 1,182 freeholders (Exhibit 1) with representatives from 570 freeholders signing the Petition (48%). The Petitioners also stated they have satisfied the fifty-one percent 51% assessed valuation threshold required by IC 14-33-2-2(2). Petitioners recalculated this threshold valuation using the 2024 Property Tax Assessment data. Petitioners have shown that the threshold is met for the entire conservancy district, as well as for each municipality, Fishers (55.65%), Indianapolis (53.54%), and McCordsville (70.61%). The Hamilton County Superior Court found that the Petition conforms to the signatory requirements of Indiana's Conservancy District Statute and Reservoir Conservancy District Statute.

The Petition requests that the GRCD be established as a reservoir conservancy district for these purposes outlined in IC 14-33-24-6:

- 6) Developing forests, wildlife areas, parks, and recreational facilities if feasible in connection with beneficial water management
- 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.

The referral from the Hamilton Superior 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 served as the Hearing Officer for the Division of Water.

Section B: Public Notice, Hearings, and Comments

1. Advertising

In accordance with Indiana Code 14-33-2-21 and IB 36, on December 9, 2025, the Division circulated letters to state and local governmental entities that potentially have administrative jurisdiction over one or more of the purposes for which the GRCD 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: Citizens Energy, Hamilton County (Commissioners, Council, Surveyor, Soil and Water Conservation District, Emergency Management Agency, MS4 Coordinator, and Health Department), Marion County/Indianapolis (Commissioners, City Council, Surveyor, Soil and Water Conservation District, Emergency Management Agency, MS4 Coordinator, Health Department, and Drainage Board), Hancock County (Commissioners, Council, Emergency Management Agency, Surveyor, Soil and Water Conservation District, MS4 Coordinator, Regional Sewer District, Health Dept.) Fishers (City Council, Emergency Management Agency, MS4 Coordinator, and Health Department), McCordsville (Town Council, and MS4 Coordinator).

A public hearing was scheduled on December 8, 2025, to allow the Petitioner and Remonstrators to provide evidence concerning the establishment of the GRCD 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 Nov 22, 2025, in The Indy Star, a newspaper of general circulation in Hamilton, Marion, and Hancock County.

An informal preconference took place on December 4, 2025, with all parties being represented. DNR Assistant General Counsel Rebecca McClain led the meeting to discuss procedural components of the upcoming public hearing scheduled for December 8, 2025. The following was decided and agreed upon by all parties:

Public Hearing Procedure:

- 11am to 12:30 am
 - 1.5 hours for represented parties and their respected witnesses
 - 45 mins per represented party
- 12:30am to 2pm
 - 1.5 hours for public comment
 - 3 minutes per individual
 - Mayor Fadness has requested time to speak between 11:45 and 12:05.
 - A second public hearing will only be held if members of the public requesting time for public comment exceed the 1.5 hours allotted unless attendees subsequently submit written comments.
- Written documentation may be submitted prior to the commencement of the public hearing.

Written Comments:

- All written comments including any documentation should be submitted to the Division by Dec. 19.
- DNR legal encourages represented parties to file any evidence with the trial court, which has jurisdiction over any evidentiary hearing under IC 14-33-2-25.

2. Public Hearing

The Division of Water held the public hearing as scheduled on December 8, 2025, in the Fishers Municipal Center, Theatre Room, 1 Municipal Dr, Fishers, Indiana. 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 livestreamed and the recording placed on the Division of Water Conservancy District webpage.

Division staff Kristi Johnson served as the Hearing Officer and opened the public hearing as scheduled on December 8, 2025, to receive evidence and public comments on the proposed GRCD as required by IC 14-33-2-19(a). Isabella Foster appeared on behalf of the Division, David McGimpsey and Briana Clark represented the proposed GRCD, and Mike Maxwell, Alan Hux, and Gordon Byers appeared on behalf of the Remonstrators.

Approximately 25 persons attended the public hearing. Johnson provided an overview of the Division's responsibilities regarding the review of the Petition and announced that McGimpsey would present additional evidence on behalf of the GRCD.

The Petitioners' attorney, McGimpsey, presented evidence in support of the Petition. The Remonstrators then presented their evidence against the formation of the GRCD. Public comments in favor of the proposed GRCD were accepted first followed by comments from those opposed. 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 December 19, 2025. At the public meeting, Johnson announced the date of the Natural Resources Commission meeting at which the factfinding report would be presented on January 20, 2026, at The Garrison at Fort Harrison State Park in Indianapolis. 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

Cory Peter is the current president of the Geist Lake Coalition. He testified that the conservancy would provide dedicated funds to address the problems with the lake. The proposed GRCD would share the cost among all lake residents who would benefit from the work. About 25% of the residents currently support the Geist Lake Coalition. The Coalition operates solely on donations receiving around 200-300 donations a year. This amount does not sustain the amount that is needed to adequately manage the reservoir and fluctuates each year. Further, it is impossible to know from one year to the next how much the Coalition will receive in donations. The formation of a reservoir conservancy district would allow dedicated funding from everyone in the district's area. Those funds could be anticipated and budgeted.

Dale Gick, P.E. is a Project Manager from Commonwealth Engineers, Inc. with expertise in projects involving dams, levees, and stormwater engineering. His presentation consisted of the purposes of the GRCD, necessity, economic and engineering feasibility, cost/benefit ratio, projected upfront one time and annual costs, serves a proper area, and compatibility with existing water management or water supply projects. It was noted during the presentation that the petitioners did not have any sample data taken in support of their views and a majority of their evidence came from IDEM and from continued USGS studies that have taken place at Geist and Morse Lakes. IDEM has listed Geist Reservoir as eutrophic, with a score higher than 60. Geist Reservoir faces high amounts of blue green algae and possible fish kills without treatment. The petitioners noted that since the treatments on the lake started there has not been a health warning from the local health department warning lake users of the dangers of blue-green algae. Gick discussed the potential projects that GRCD would complete which included dredging, vegetation and algae treatment, channel stabilization, and shoreline stabilization. Johnson asked for clarification on what "stabilization of tributaries and shorelines" meant, she followed up with examples like hard armoring and bioengineering. Gick responded that any of the proposed options would be considered to complete the stabilization projects. Foster asked what the planned fees were per freeholder and the planned recreation fee. Peter from the Geist Lake Coalition stated that the special benefit tax rate would not exceed what is allowed in statute which is six and sixty-seven hundredths cents (\$0.0667) on each one hundred dollars (\$100) of assessed valuation of property in the taxing district (IC 14-33-7-3). Peter also commented that

the proposed annual recreation fees would be \$125 for freeholders and \$250 for non-district persons. No daily recreation fee was proposed, and it was unknown how GRCD would implement and collect the recreation fee. Johnson noted that the current proposed rates for recreation fees of \$125 for freeholder and \$250 for non-district watercraft are not allowable by statute. Under IC 14-33-24-9(d) the following apply to fees imposed under subsection (c):

- (1) The fee allowing a nonresident to use a watercraft for an entire year may not be more than fifty percent (50%) greater than the fee allowing a resident to use a watercraft for an entire year.
- (2) The fee allowing a resident to use a watercraft for a single day may not exceed seventeen percent (17%) of the fee allowing a resident to use a watercraft for an entire year.
- (3) The fee allowing a nonresident to use a watercraft for a single day may not exceed seventeen percent (17%) of the fee allowing a nonresident to use a watercraft for an entire year.

At the end of the Petitioners' time, it was clarified that the Geist Lake Coalition does have a treatment plan already established due to their previous years of treatment for algal blooms and vegetation on the lake. They worked in conjunction with a local company to create a plan and to obtain the correct permits from IDNR's Fish and Wildlife division. This plan was not submitted to the hearing officer at the public meeting but was verbally mentioned.

II. The Remonstrator's Presentation in Opposition to Establishment

Gordon Byers representing Marina first remarked how the remonstrators received the petitioners' technical report the Friday before the hearing, therefore the Marina did not have ample time to review and prepare an adequate response. The Marina has negotiated a license agreement and deed restrictions which the Marina believes is grounds to prevent the establishment of the GRCD. Byers also noted that the establishment of the GRCD would charge people for the use of the lake, arguing that the establishment of the GRCD would be setting a dangerous precedent. The Marina's concerns stem from the reservoir conservancy district statute never having been used before. He further argued that the benefits do not outweigh the costs to all the people who use Geist and that the proposed problems and works do not stay entirely within the bounds of the district.

Mike Maxwell representing Marina II addressed the necessity of a second hearing based on their interpretation of the law, arguing that because they did not have prior access to the technical report and were not able to prepare a response the Marina II was not provided a meaningful and effective opportunity to be heard at the public hearing.

Alan Hux representing Marina expressed an objection to the proposed GRCD because the boundary does not serve a proper area due to the benefits being received outside of the proposed area. Hux then covered that the costs do not outweigh the benefits, and that it is unfair to have recreators and the people adjacent to the lake paying to subsidize positive effects for the homeowners and the residents of Fishers that are not included in the boundary.

Scott Delpha provided testimony on behalf of the Remonstrators to speak in opposition of the establishment of GRCD. Delpha explained how he is from the area and was representing the Geist fishing community. He noted that all the fishing tournaments and local events that happen on the lake positively impact the local community and economy. Delpha further explained that if the GRCD was established this could prevent these types of events and tournaments from happening due to additional recreation fees that could price anglers out of visiting Geist reservoir. Concerns were expressed that recreators would be driven away from the lake due to fees.

III. Written Comments and Supporting Documentation from Petitioners and Remonstrators

On December 19, 2025, the Remonstrators submitted comments and supporting documentation to the Division in opposition to the formation of the GRCD. The main arguments cited were *Geist Reservoir Conservancy District Technical Report Review* by Theodore Blahnik of V3 Companies (Exhibit 3), *Review and Consulting*

Report by Carl Heckman and Michael Lady of Integra Realty Resources (Exhibit 3), a Limited Warranty Deed which transfers the ownership of the real estate for Geist Reservoir from the City of Indianapolis to Citizens Energy (Exhibit 4), and an Asset Purchase Agreement (Exhibit 5). The Blahnik Report's conclusion from Exhibit 3 is that the solutions proposed by the Petitioners will have little to no benefit towards the nutrient or sedimentation problems the reservoir faces. The Lady/Hackman report from Exhibit 3 concludes that the appropriate annual change for property values should be 8.5% per year if the issues are not addressed. The Remonstrator's claim that the Limited Warranty Deed (Exhibit 4) and Asset Purchase Agreement (Exhibit 5) prohibit Citizens Energy from restricting access of Geist Reservoir by unreasonable usage fees. The Remonstrators contends that if Citizens Energy and GRCD enter into an operating agreement, Citizens would be violating the restrictions of the Geist Deed.

In response to the Remonstrator's final comments, on December 19, 2025, Brianna Clark submitted additional information in rebuttal and to address questions asked by the Hearing Officer at the public hearing. Petitioners provided the *2026 Geist Reservoir Aquatic Vegetation Management Plan* by Aquatic Control (Exhibit 6), expert rebuttal to the Remonstrator's reports (Exhibit 8), and additional documentation in support of the establishment of the GRCD (Exhibit 7). Proposed fees for annual and day passes were provided in the additional documentation:

- A. Resident/In District fees of \$175.00 for an annual pass, \$15.00 for a day pass,
- B. Non-resident/Out of District fees of \$250.00 for an annual pass, \$25.00 for a day pass

Petitioner stated the fees are compliant with IC 14-33-24-9. The goals listed within the aquatic management plan (Exhibit 6) claim to address high areas of importance, invasive mapping and data collection, plans for future fish population studies, public meetings to collect public input, public education, and various feasibility studies. The rebuttal (Exhibit 8) addressed the Remonstrator's concerns about the cost benefit ratio, using the Remonstrator's recommended percentage for home valuation with treatment vs without. The Petitioners claim that both percentages provided by the Petitioners and Remonstrators show that the benefits outweigh the proposed costs.

The following Exhibits were accepted before and during the public meeting:

- Exhibit 1 Geist Reservoir Conservancy District Technical Report
- Exhibit 2 Geist Reservoir Conservancy District Public Hearing Presentation

The following Exhibits were accepted after the public meeting:

- Exhibit 3 Remonstrator's Comments on Geist Reservoir District
- Exhibit 4 Remonstrator's Limited Warranty Deed Geist Reservoir
- Exhibit 5 Remonstrator's Asset Purchase Agreement for Geist Reservoir
- Exhibit 6 Petitioners' Aquatic Vegetative Management Plan
- Exhibit 7 Petitioner's Additional Documentation in Support of Establishment
- Exhibit 8 Petitioner's Expert Rebuttal

The following Exhibits are attached to this report:

- Exhibit A Petition for the Establishment of the Geist Reservoir Conservancy District

Exhibit B Comments from State agencies

Exhibit C Comments from local agencies

4. Written 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 on December 10, 2025, recommending it would be beneficial to ask the Hancock County Regional Sewer District for comments due to a small overlap of “waterfront property” of service area of the sewer and conservancy district.

Martha Mettler responded on behalf of IDEM’s office of Water Quality on December 30, 2025, stating they have no concerns, only a reminder to apply for the necessary IDEM permits regarding dredging and other construction projects.

Steve Davies responded on behalf of IURC on December 23, 2025, recommending the DNR reach out to Citizens Energy for comment. IURC staff have no concerns with the proposed conservancy district. IURC staff further note that no other entity is proposing to operate a utility or to control the Citizens Water Geist Reservoir operations in any way.

II. Other Governmental Entities

Derek Adams, Environmental Health Specialist for Hancock County Health Department on December 9, 2025, stated the department had no comments on the information submitted at that time.

Morgan Bennett, Senior Environmental Health Specialist for Hamilton County Health Department on December 10, 2025, stated the proposed boundaries fall within the jurisdiction of City of Fishers Health Department and recommended we ask the Fishers Health Department for comment.

John Hazlett, Marion County Soil and Water Conservation District on December 18, 2025, provided the following comments; that the continued sedimentation of the reservoir will continue to be a problem from upstream agricultural impacts, the SWCD encourages GRCD to leverage other funding sources such as the IDEM 319 grant and the DNR LARE grant, the GRCD needs to address a bigger watershed area since both urban and agriculture uses are impacting the reservoir's health, lastly pet and lawn care educational efforts should be addressed to local residents and visitors.

III. Members of the Public

Comments in Favor of the Geist Reservoir Conservancy District:

Many of the comments in favor of GRCD focused on the condition of the lake. Several comments noted severe and continued algal blooms that are difficult and expensive to treat along with the persistent and invasive nature of zebra mussels. Residents pointed to the toxicity of the lake water and how it is necessary to wash off after recreating in/on the lake to prevent skin reactions. Some commentors opined a conservancy district would provide a reliable income stream to treat the invasives and to take measures to remediate the lake. Because all lakefront property owners would benefit, according to many comments, all should participate in the costs, rather than the few who have donated to the Geist Lake Coalition. Continuing to rely on voluntary membership in the Geist Lake Coalition and donations is not sufficient to manage the lake. It was argued the establishment of the GRCD will benefit all people who visit the reservoir for fishing, boating, recreating, and supporting local businesses. If the lake continues to degrade with no active management, it will negatively affect the local

economy due to less visitors. Without active management, this reservoir will continue to degrade and having compounding effects on businesses, the local community, and health of the environment.

Comments Opposed to the Geist Reservoir Conservancy District:

Those opposed to the proposed GRCD pointed to the extra fees that would make it a hardship to continue recreating on Geist and potentially drive away local anglers. It was noted that all motor craft belonging to visitors must use the Marina's ramp and pay a fee, then in addition would have to pay a fee to the GRCD. The main concern noted was the financial impact a conservancy district would have on fishermen, recreators, and local fishing tournaments that take place on the lake. Locals who live in the surrounding area who frequent the reservoir have noted beliefs that having to pay for use of the lake is unfair and have voiced concerns that lakefront owners are trying to pass on the financial responsibility. Others have stated that previous treatment plans haven't worked or seem to only benefit lakefront property owners. Most opposition shares a fear the GRCD will effectively privatize the lake pricing other locals and anglers from using the lake with high recreation fees. Some people mentioned the current boundaries do not represent people who live near the lake and use it; having to contribute financially to the GRCD is not fair without representation on the board.

Comments from Citizens Energy:

Steve Berube Director of Water Production submitted comments on behalf of Citizens Energy on December 19, 2025. Citizens has no opposition or concerns about the formation of GRCD and agree to adhere to IC 14-33-24. GRCD shares a common desire to for the reservoir to remain an asset for the community and it was noted that the proposed works will not only serve recreational purposes but are complimentary to Citizens' interests in water supply. Citizens has the right and need to approve any proposed work in the reservoir to make sure it does not affect their operations; prior successful voluntary efforts with the Geist Lake Coalition shows that this will not be an issue. Citizens offered a correction to the Petitioner's technical report, pointing out that USGS installed a real-time level gage stationed near the Geist Reservoir spillway in 2020.

Section C: Proposed Findings and Recommendations

Under IC 14-33-1-1 and IC 14-33-24-6, a conservancy reservoir district may be established for any of the following purposes:

1. Developing forests, wildlife areas, parks and recreational facilities if feasible in connection with beneficial water management;
2. 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.

Pursuant to IC 14-33-2-17, the Division's determination and recommendations to the Hamilton Superior 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. Appears to be necessary

The Petition proposes the GRCD to be established for two legislated purposes, 1) Developing forests, wildlife areas, parks, and recreational facilities if feasible in connection with beneficial water management and 2)

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.

It was clearly noted by the petitioners, the Geist Lake Coalition and the Mayor of Fishers, that the reservoir conservancy district is the only viable option to the jurisdictional issues that face Geist Reservoir due to the three counties and the several municipalities that surround the proposed area. Over the years no single entity has taken sole responsibility for the issues the residents and recreators face on Geist Reservoir which is why a voluntary effort was started but the continued reliance on donations only has become increasingly unsustainable.

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

Clearly defined specific activities related to the intent of this purpose were not identified within the Petition or during the presentation during the public hearing on December 8, 2025. Existing public park and recreational facilities in the proposed conservancy district consist of the reservoir owned by Citizens Energy, Geist Waterfront Park owned by the City of Fishers, Geist Park owned by Hamilton County Parks and Recreation Department, and a boat ramp owned by the Marina. It was mentioned that sedimentation over the years has reduced boat access on the reservoir, especially on the northeast end of the reservoir east of Olio Road. Proposed targeted dredging could increase reservoir access to waterfront freeholders.

Purpose: Operation, maintenance, and improvement of a work of improvement for water-based recreation purposes; 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; however, they were discussed during the hearing on December 8, 2025, the *Geist Reservoir Conservancy District Technical Report* by Commonwealth Engineers, Inc. (Exhibit 1), and the *2026 Geist Reservoir Aquatic Vegetation Management Plan* by Aquatic Control (Exhibit 6). A variety of issues were addressed at the public hearing and in the exhibits that negatively impact recreation at Geist Reservoir which are presented below. The proposed GRCD would address these issues mostly through in-lake or shoreline practices or treatments.

Sedimentation: Various United States Geological Survey (USGS) reports cited from 1980, 1996, and 2016 indicated that Geist Reservoir continues to receive a high enough amount of sediment that slowly fills in the lake. An annual sedimentation rate for Geist was calculated at 75,000 cubic yards per year based on the USGS 1996 study and 40,000 cubic yards per year based on the USGS 2020 study. No presented report indicated the source of the sediment, but based on bathymetric maps and aerial imagery, a good portion of sediment is entering the reservoir from the Fall Creek inlet on the northeast side of the reservoir where depths are shallow and impact recreation opportunities. The Marina's map of Boating Limitations on Geist Reservoir that was provided shows the shallow areas that boats are not allowed to navigate due to the sedimentation of the lake. It was indicated that dredging activities have been completed by Citizens, the City of Fishers, and the Geist Lake Coalition in the past but it has been inconsistent. The GRCD proposes to manage sedimentation through dredging, shoreline stabilization, and stabilization of tributaries if established. No detailed plans were provided. During the public hearing it was noted that proper dredging would increase access to more parts of the lake to all users. It was stated that dredging along with installation of catch basins would decrease the amount of nutrients in the lake, in turn decreasing turbidity and the chance of continued algal blooms.

Nutrients: During the public hearing, it was noted that the reservoir contained high nutrient levels. Despite not having recent monitoring data, the Exhibit 1 mentioned that the IDEM 2024 Integrated Water Monitoring and Assessment Report listed Geist Reservoir as eutrophic with a stable trend, which generally results from consistent high nutrient concentrations in a lake. Exhibit 1 referenced the *2015 Long-term Capital and Maintenance Plan* (2015 Fishers Report) prepared by the City of Fishers

which indicated that the reservoir is in a eutrophic state. The 2015 Fishers Report identified phosphorus as the limiting nutrient at Geist Reservoir and that future management efforts should focus on its reduction. The Petition did not state how it would address phosphorus reduction but can be included in the required work plan if approved.

Aquatic Invasives: It was noted that Geist Reservoir contains multiple aquatic invasives including zebra mussels (*Dreissena polymorpha*) and Eurasian watermilfoil (*Myriophyllum spicatum* L.) which impede recreational opportunities. No current or future plans were presented for the management of zebra mussels which can be difficult to eradicate after a waterway has been infested with them for a longer period of time. Eurasian watermilfoil is currently being treated through funds from the Geist Lake Coalition at the cost of around \$275,000 a year. The Petitioners stated that current funds raised through donations is not enough to adequately treat the reservoir and that long-term funding through a conservancy district would assist in full treatment of aquatic invasives on the lake. Exhibit 6 stated that the Geist Lake Coalition have been treating the reservoir since 2013 and that the area of treatment varied to funding and colony fluctuations. The proposed GRCD indicated that it would continue treatment of Eurasian watermilfoil and other nuisance aquatic plants. There was no indication if there would be any treatment or preventative measures completed for zebra mussels if the GRCD were to be established. If GRCD is established, it is recommended that GRCD complete aquatic invasive and nuisance management in a way that will not negatively impact fish habitat and recreational fishing.

Algae: Exhibit 1 stated that Geist Reservoir was considered impaired (Category 5) for algae on Indiana's Finalized 2024 303(d) list of Impaired Waters. Exhibit 6 stated that the reservoir has been treated for filamentous algae since 2009 with the Geist Lake Coalition providing funding starting in 2013. No recent harmful algal blooms have been observed but the Great Lakes Coalition believe this is due to them treating the reservoir for algae every year. It was stated that the GRCD would continue treatment of algae if it were to be established.

Polychlorinated biphenyls (PCBs): It was noted in Exhibit 1 that Geist Reservoir was considered impaired (Category 5) for PCBs in fish tissue on Indiana's Finalized 2024 303(d) list of Impaired Waters. Typically, fish become contaminated with PCBs from runoff with PCBs or by eating contaminated prey. PCB contamination can be difficult to remove in a lake and is usually not addressed by conservancy districts. The Petitioners stated that the GRCD would not address PCBs. If GRCD is established, it is recommended that GRCD promote the Indiana Fish Consumption Guidelines developed by the Indiana State Department of Health.

The formation of the GRCD for the petitioners' purpose of developing forests, wildlife areas, and recreational facilities has not been clearly supported with additional information in the submitted technical report; if established it is recommended that district plan adequately addresses this purpose with plans, specifications, and costs. Despite the petition not identifying any activities except dredging for this purpose, it is recommended that if GRCD is established, this purpose remains since it will be established as a reservoir conservancy district under IC 14-33-24. In general, the purpose for operation, maintenance and improvement of a work of improvement that is built for any other purpose authorized by this section appears to be necessary. Many of the exhibits, testimony, and discussion at the public hearings focused on water quality issues and recreational needs, and it appears to be important and necessary to address these issues and needs with beneficial water management.

2. Holds promise of economic and engineering feasibility

The petitioners seek establishment of a reservoir conservancy district to finance units of work and operating costs to achieve the purposes stated in the petition.

Currently, there is a Geist Lake Coalition that provides some funding for units of work with a minimal budget. All efforts are voluntary, and their yearly budget can fluctuate based on local donations year to year. It was

indicated that Geist Lake Coalition and individual property owners funding for units of work was not enough to maintain or improve Geist Reservoir. The current budget for Geist Lake Coalition was not provided, but they mentioned that around \$275,000 a year is spent on treating aquatic invasives and algae. Many of the public comments in favor of the conservancy district stated that the long-term funding of Geist Lake Coalition is not stable enough to provide the proper management services that Geist Reservoir needs.

Exhibit 7 stated that recreation fees for freeholders would be \$175.00 for an annual pass and \$15.00 for a day pass. Non-freeholders would pay \$250.00 for an annual pass and \$25.00 for a day. No estimate was provided on how much revenue would be generated and it is unclear on how it would be implemented since the proposed GRCD would not control any of the ramps or beaches on the reservoir. The proposed fees are in compliance with IC 14-33-24-9 and seem comparable to fees on other lakes in Indiana. Many of the comments that were received that are against the formation of GRCD stated that they were fearful that they would be priced out of being able to recreate on Geist or access would be restricted. If established, GRCD should be careful that their recreation fees do not violate the Geist Purchase Agreement (Exhibit 5) which prohibits unreasonable usage fees and IC 14-33-24-8.

During the public hearing it was stated that the special benefit tax rate would not exceed what is allowed in statute which is six and sixty-seven hundredths cents (\$0.0667) on each one hundred dollars (\$100) of assessed valuation of property in the taxing district (IC 14-33-7-3). No annual estimate was provided however, the summary of 2024 assessed values for the conservancy district was \$1,485,920,300 as provided in the property cards and summary attached to the Petition (Exhibit A). The proposed special benefit tax rate would result in an estimated budget of \$991,108.84 a year and would meet the requirements of IC 14-33-9-11.

Tables No 5. Estimated One-Time/Upfront Costs & No 6. Estimated Annual Costs from Exhibit 1 represent the GRCD's priorities for their works of improvement. Included was a disposal site for sedimentation removal, engineering costs, legal fees, biological services, technical services, contingencies, and operation and maintenance. The upfront costs are listed as \$2,717,546 and the estimated annual costs are listed as \$1,745,782. The total estimated costs of the listed projects for thirty years are \$55,091,006.

There were no specific designs for the proposed activities in Exhibit 1 except for the aquatic invasive and algae treatment plan provided in Exhibit 6. The proposed activities of dredging, treatment, shoreline stabilization, and bank stabilization are fairly common best management practices for lake management and can be addressed in more detail in the work plan if approved. Also, most of the potential units of work that were presented in the exhibits and public hearings could be implemented in phases so costs could be covered in the annual GRCD budget and have a reduced financial burden on the freeholders and recreational users.

Establishing the GRCD offers public entity status, direct local oversight, and affordable financing options to the petitioners while also enhancing water management and recreational possibilities that can be shared by all freeholders. The establishment of a reservoir conservancy district would also allow grants and loans to be secured as outlined in IC 14-33.

It appears that the proposed GRCD mostly holds promise of economic and engineering feasibility if works of improvement are implemented at a rate that does not create a financial burden to the freeholders and those that would recreate on the reservoir.

It is recommended:

- that more detailed economic and engineering feasible units of work be presented in the district plan if the GRCD is approved
- that the rates be in conformance with IC 14-33-7-3 special benefits tax rate and

- if an annual recreation fee is implemented it is also recommended to implement a daily recreation fee and make sure the fees are in accordance with IC 14-33-24-9(d)

3. Seems to offer benefits in excess of costs

Exhibit 1 provided by the petitioners on December 5, 2025, included estimated costs of the works of improvement and a comparison of the benefits and costs. The Valuation Consulting Report (2019) and Addendum to the Valuation Consulting Report (2025) in Exhibit 1, states that with the proposed works by the GRCD, waterfront property values will rise 12.5% compared to 2.5% per year without improvements. Per year the district is reporting a net benefit of \$157,032,057. It is noted in Exhibit 1 that the cost benefit ratio is entirely based on property values and additional benefits of improved recreation, removal of invasive species or plants, and restored reservoir depth are not factored into the analysis.

The public comments received at the meeting and via email have noted concerns with sedimentation, lake depth, and invasive species. There were some comments from the public that have waterfront docks stating they can no longer jump off them or have to dig out sedimentation from under their docks to ensure they can dock their boats. The fishermen in support of the GRCD view the formation to be key in restoring lake depth to improve water quality in the lake thus increasing the quality in fishing. Long standing locals stated the need for establishment after watching the reservoir deteriorate over decades and see the GRCD as a viable way to share responsibility of stewardship over the reservoir.

Remonstrators submitted a review and consulting report on December 19, 2025, completed by Integra Realty Resources (Exhibit 3). This report served as an analysis for the accuracy of the Addendum to the Valuation Consulting Report in Exhibit 1. Exhibit 3 indicated that waterfront property values will rise 8.5% per year without improvements compared to the 2.5% per year cited in Exhibit 1. However, Exhibit 3 also showed that waterfront property values only increased on average 3.3% from 2023-2024 and 2.3% from 2024-2025 without improvements.

On December 19, 2025, Brianna Clark submitted additional information to address the Remonstrator's concerns and questions asked by the Hearing Officer at the public hearing on December 8, 2025. The rebuttal addressed the Remonstrator's concerns about the cost benefit ratio, using the Remonstrator's recommended percentage (8.5%) for home valuation with treatment vs without, both percentages provided by the Petitioners and Remonstrators show that the benefits outweigh the proposed costs. The cost would be \$55,091,006 and the revised benefits at 8.5% would be \$62,812,823 with a revised benefit-cost ratio of 1.14.

Based on the exhibits, testimony, and comments presented during the public hearings on December 8, 2025, it is anticipated that the establishment of the GRCD for the two stated purposes will offer benefits in excess of costs for recreational improvements and operation and maintenance. It is also anticipated that the establishment of the GRCD for the stated purposes would have a sustaining positive effect on property values.

4. Proposes to serve the public health

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

5. Proposes to cover and serve a proper area

IC 14-33-3-1 states that "any area may be established as a District if each part of the District is contiguous to another part." The petition filed on October 18, 2024 (29D05-2410-MI-011775) states that the proposed GRCD boundaries include all waterfront parcels on Geist Reservoir and all areas of Geist Reservoir, with the dam as the southwest boundary and Florida Road as the northeast boundary. The detailed map of the exact proposed district boundaries was provided by the petitioners to confirm the contiguous nature of the proposal (Exhibit A).

The proposed GRCD has committed to work within the unique local constraints in order to achieve its purposes. It is duly noted that a utility owner, Citizens Energy, governed by a board of directors owns at least twenty-five percent (25%) of the surface of the reservoir located within the boundaries of the proposed reservoir conservancy district. It is noted the Citizens Energy owns the dam and a 20ft easement along the surrounding shoreline.

It was noted by the Remonstrators, multiple public comments, and the Marion County Soil and Water Conservation District that the proposed area would not adequately address sediment, nutrients, and other pollution that is flowing into the reservoir from areas outside of the proposed district. While this is probably true, the formation of a reservoir conservancy district would at least allow for a single entity to start providing continuous in-lake treatment to address its water quality and recreation issues. Exhibit 1 also indicated the educational materials would be used to assist in reducing nutrients from entering the reservoir and furthering the mission of the proposed GRCD. The reservoir conservancy district would also have the option to expand its boundaries in the future as allowed under IC 14-33-4. An expansion of boundaries could help address the amount of sediment and nutrients flowing into Geist.

As proposed, the GRCD boundaries appear to cover and serve a proper area in order to achieve the proposed purposes.

6. 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

There are no other conservancy districts whose boundaries overlap those of the proposed District. Part of the Hamilton County Regional Utility district is in the proposed boundaries, however GRCD would not be providing any utility services since it would only function as a reservoir conservancy district. The proposed GRCD could be established and operated in a manner compatible with other already established Districts and local government. Citizens Energy did not oppose the establishment of the GRCD and will sign an operating agreement with the GRCD to ensure each party's responsibility. It should be noted that Citizens Energy includes dredging costs in their customers' fees and has completed dredging projects in the past. It is unclear how Citizens will coordinate with GRCD on proposed dredging projects, but according to public comments, Citizens has coordinated with Geist Lakes Coalition in the past on dredging projects and it is anticipated that they will continue to do so. The City of Fishers in a public statement mentioned that they would have no objection to the formation of GRCD. It is recommended that discussions between Citizens Energy, GRCD, and the City of Fishers continue, and a decision is made as to which entity is responsible for what kind of dredging and where.

It is unknown how the proposed GRCD would collect and enforce recreation fees on the reservoir. The Marina owns the only boat ramp on the reservoir that can be used by the public, and they are opposed to the establishment of a reservoir conservancy district. While cooperation between the two entities would be preferred, it is unknown how they would operate in a manner compatible with each other. The Petitioners mentioned at the public hearing that they could have their recreation fees paid online but it is unclear how it would be enforced.

Overall, the proposed GRCD would be considered compatible with established conservancy districts, government units, flood control projects, reservoirs, lakes, drains, levees, and other water management or water supply projects. If established, it is recommended that:

- The reservoir conservancy district enters into an operating agreement with Citizens Energy as required under IC 14-33-24-7
- Enters into an agreement with the City of Fishers, Hamilton County Parks and Recreation Department, and the Marina on recreation fee prices and how it will be implemented.

Section D: Division's Recommended Findings

The Division finds that the documentation, testimony, statements, and exhibits presented by the Petitioners mostly

answer the questions from IC 14-33-2-17 and therefore recommends the establishment of the proposed GRCD.

It is recommended by the Division that if the GRCD is established:

- That the district plan adequately addresses the purpose of developing forests, wildlife areas, and recreational facilities with plans, specifications, and costs. Despite the petition not identifying any activities except dredging for this purpose, it is recommended that if GRCD is established, this purpose remains since it will be established as a reservoir conservancy district under IC 14-33-24.
- That more detailed economic and engineering feasible units of work be presented in the district plan if the GRCD is approved.
- That the special benefits tax rates be in conformance with IC 14-33-7-3 and if an annual recreation fee is implemented it is also recommended to implement a daily recreation fee and make sure the fees are in accordance with IC 14-33-24-9(d). It is also recommended that the daily recreation fees are set at a rate that would not discourage public use of the reservoir (IC 14-33-24-8).
- That coordination with dredging activities between Citizens Energy, GRCD, and the City of Fishers continue.
- That the reservoir conservancy district enters into an operating agreement with Citizens Energy as required under IC 14-33-24-7.
- That the GRCD enters into an agreement with the City of Fishers, Hamilton County Parks and Recreation Department, and the Marina on recreation fee prices and how it will be implemented.
- That all activities that require notice or permits are submitted to all proper agencies and/or authorities.

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

 Recoverable Signature

X David Knipe, P.E., CFM

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

Exhibit A

Petition for the Establishment of the Geist Reservoir Conservancy District

STATE OF INDIANA)
) SS: IN THE HAMILTON SUPERIOR COURT 5
COUNTY OF HAMILTON) CAUSE NO. 29D05-2410-MI-_____

IN THE MATTER OF THE GEIST)
RESERVOIR CONSERVANCY)
DISTRICT)

**PETITION FOR THE ESTABLISHMENT OF THE
GEIST RESERVOIR CONSERVANCY DISTRICT**

We and each of us, are freeholders within the territory described in Exhibit A attached hereto who desire, and hereby petition for the establishment of a “reservoir conservancy district” pursuant to Ind. Code § 14-33-24 *et seq.*, Ind. Code § 14-33-2, and Ind. Code § 14-33-2-4, in and encompassing said territory, and state as follows:

1. That the reservoir conservancy district is established and created pursuant to Ind. Code § 14-33-24 *et seq.*
2. The name for the district shall be the “Geist Reservoir Conservancy District” (the “District”).
3. The territory, substantially as described in Exhibit A but which may be amended from time to time prior to the establishment of the District, is to be included in the District.
4. Pursuant to Ind. Code § 14-33-24-6(1)(A) and (B), the purposes of the District shall be as follows: (1) developing forests, wildlife areas, parks and recreational facilities in connection with beneficial water management, and (2) operation, maintenance and improvement of works of improvement including but not limited to Geist Reservoir.
5. The necessity for accomplishing such purposes are as follows: (a) the territory spans portions of three counties, which creates difficulties for any one of the counties to carry out the purposes of the District; and (b) an entity is required which is capable of and responsible for

directly overseeing, financing and carrying out the treatment and maintenance of Geist Reservoir as a recreational facility in connection with beneficial water management.

6. The boundaries of the District will encompass part or all of Geist Reservoir which is located partly within a consolidated city.

7. At least twenty-five percent (25%) of the surface of the reservoir located within the boundaries of the District is owned by a utility governed by a board of directors for utilities under Ind. Code § 8-1-11.1-3.

8. Establishment of the District will be conducive to the public health, safety, or welfare.

9. The costs and damages of and to be paid solely by the District for treating and maintaining Geist Reservoir will probably be less than the benefits received in the District.

10. This Petition is not conditioned upon either a grant of federal or state funds.

11. Maintenance, repair and operation of the works of improvements necessary for (1) developing forests, wildlife areas, parks and recreational facilities in connection with beneficial water management and (2) operation, maintenance and improvement of works of improvement including, but not limited to Geist Reservoir, shall be paid for by both an annual levy of special benefit taxes and an assessment on any land found to be exceptionally benefitted; or by another method provided by statute, all as the Court may order in its approval of the district plan.

12. There shall be nine (9) directors of the District, one elected from each of the nine (9) areas described in Exhibit B.

13. The District shall have all powers provided by applicable statute, whether in effect now or in the future, and in accordance with any agreements that the District may enter into with

any commercial licensee or utility owner, as those terms are defined in Ind. Code § 14-33-24-1 and Ind. Code § 14-33-24-5.

14. Further details regarding the operations of the District shall be set forth in the district plan.

15. As shown on the signature pages attached hereto as Exhibit C, this Petition exceeds the signature requirements outlined in both Ind. Code § 14-33-2-2 relative to the District as a whole, and Ind. Code § 14-33-3-1 relative to the municipalities included within the District.

16. Following the posting of a bond pursuant to Ind. Code § 14-33-2-8, proper notice being given pursuant to Ind. Code § 14-33-2-14 to the appropriate parties and by the required means pursuant to Ind. Code § 14-33-2-12, Petitioners request a hearing by the Court in conformance with Ind. Code § 14-33-2-11 to determine whether the Petition bears the necessary signatures and otherwise complies with the requirements as to form and content pursuant to Ind. Code § 14-33-2-16.

17. Upon a finding by the Court that this Petition meets the statutory requirements, Petitioners request the Petition be referred to the Natural Resources Commission pursuant to Ind. Code § 14-33-2-17 for further hearing.

18. The most land in the District is located in Hamilton County; accordingly, this Court has jurisdiction over this Petition pursuant to Ind. Code § 14-33-2-1.

WHEREFORE, Petitioners pray that the Court find that this Petition meets all statutory requirements for filing, that this Petition should be referred to the Natural Resources Commission for hearing, that upon receipt of the findings of the Natural Resources Commission the Court enter its Order establishing the District as proposed and for all other relief just and proper in the premises.

Respectfully submitted,

/s/Briana L. Clark

David T. McGimpsey, #21015-49

Briana L. Clark, #27208-06

Matthew T. Troyer, #20408-29

Dentons Bingham Greenebaum LLP

10 Market Street

2700 Market Tower

Indianapolis, IN 46204

david.mcgimpsey@dentons.com

briana.clark@dentons.com

matt.troyer@dentons.com

Attorneys for Petitioners

Exhibit B

Comments from State Agencies

From: [Faust, Emily E](#)
To: [Foster, Isabella C](#)
Subject: RE: Comments Requested - Proposed Geist Reservoir Conservancy District
Date: Wednesday, December 10, 2025 8:55:36 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)

Hi Isabella,

One comment I have so far, looks like the Hancock County Regional Sewer District and the proposed conservancy district have a very small overlap of “waterfront property” according to the written and digital description of service area. Just these two properties along W Hampton Cove Ln. The properties are in a small corner of Hancock County in the “Hampton Cove” area. Might be beneficial for the RSD and potential CD to get into contact and discuss if this overlap would be an issue.

Really doubt this would cause much of an issue but it’s worth noting.

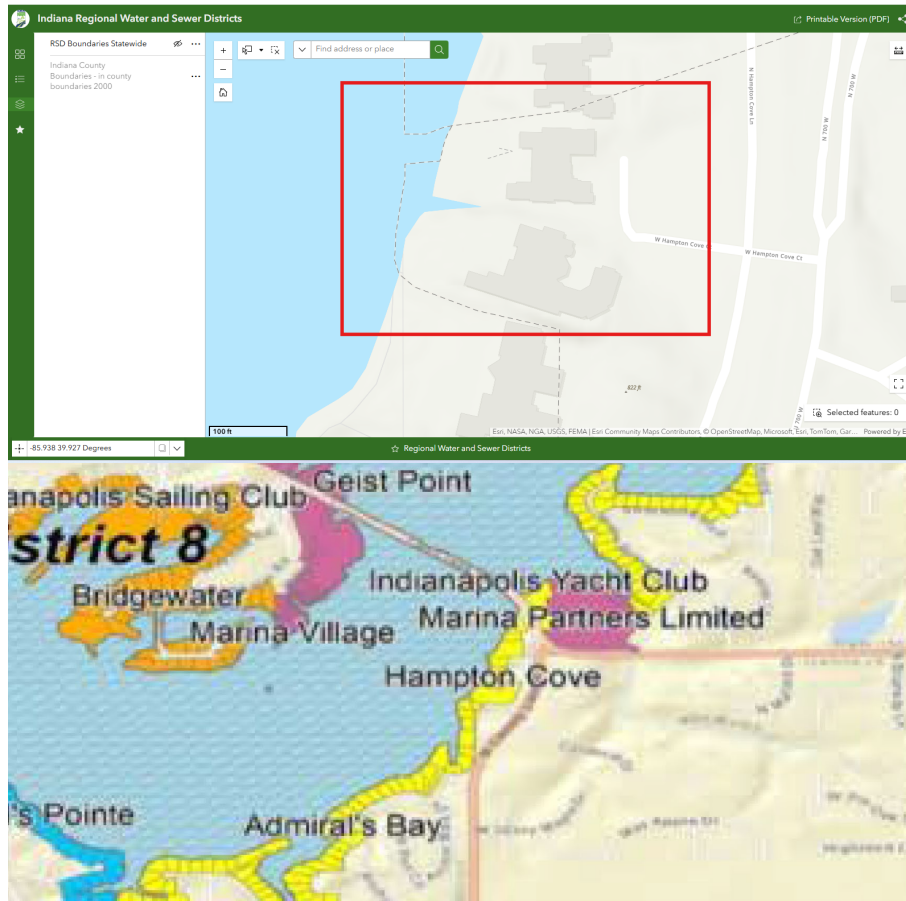
Here’s the contact info I have for the RSD:

Tom Tucker
Board President
8127384600, tuckertom481@gmail.com

And

Robert Woosley
RSD Engineer
8122808201
bwoosley@heritageeng.com

Here’s a screenshot from RSD service area map and below that is a screenshot of the boundary provided in “Exhibit B” of the petition attachments.



Let me know your thoughts.

Thanks!
Emily



Emily Faust
(she/her/hers)
Regional Sewer District Coordinator
Office of Water Quality
(317) 232-5727 • efaust@idem.IN.gov

    | www.idem.IN.gov

From: Foster, Isabella C <IsFoster@dnr.IN.gov>
Sent: Tuesday, December 9, 2025 6:39 AM
To: Faust, Emily E <EFaust@idem.IN.gov>
Subject: Comments Requested - Proposed Geist Reservoir Conservancy District

Good Morning,

The Department of Natural Resources Division of Water has received a petition for the establishment of Geist Reservoir Conservancy District and is requesting your assistance in its review. The proposed district will have the purposes of (1) developing forests, wildlife areas, parks and recreational facilities in connection with beneficial water management, and (2) operation, maintenance and improvement of works of improvement including but not limited to Geist Reservoir and will have boundaries that include all waterfront parcels on Geist Reservoir, and all areas of Geist Reservoir, with the dam as the southwest boundary and Florida Road as the northeast boundary. 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.

Thank You,
Bella Foster
Water Planner II
Indiana Department of Natural Resources
Division of Water
317-232-1507
IsFoster@dnr.IN.gov
www.dnr.IN.gov

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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

December 23, 2025

Indiana Department of Natural Resources - Division of Water
Indiana Government Center South
402 W. Washington Street, Room W264
Indianapolis, IN 46204

RE: Petition for the Establishment of the Geist Reservoir Conservancy District

Ms. Foster –

The Office of General Counsel and the Water and Wastewater Division of the Indiana Utility Regulatory Commission (together “IURC staff”) have reviewed your letter and the petition regarding the proposed establishment of the Geist Reservoir Conservancy District. IURC staff do not have any concerns with the proposed conservancy district.

IURC staff notes generally that since Geist Reservoir is proposed to be included in the district, and since the reservoir is owned and operated by Citizens Energy Group, the Department of Natural Resources may wish to reach out to Citizens Energy Group for comment. IURC staff can provide specific contact information if needed.

IURC staff further note that no other entity is proposing to operate a utility or to control the Citizens Water Geist Reservoir operations in any way. Maintenance, repair and operation of the works of improvement appear limited to that necessary for developing forests, wildlife areas, parks and recreational facilities in connection with beneficial water management.

Please do not hesitate to contact me if you have any questions or require additional information.

Sincerely,

Steve Davies
Deputy General Counsel
Indiana Utility Regulatory Commission
317-232-2711
sdavies@urc.in.gov

From: [Mettler, Martha Clark](#)
To: [Foster, Isabella C](#)
Subject: RE: Comments Requested - Proposed Geist Reservoir Conservancy District
Date: Tuesday, December 30, 2025 11:55:37 AM
Attachments: [image001.png](#)

Isabella, I'm closing the loop on this, only comment we have is to include a reminder that the dredge and fill projects under consideration may need permits from us.

From: Foster, Isabella C <IsFoster@dnr.IN.gov>
Sent: Tuesday, December 9, 2025 12:10 PM
To: Mettler, Martha Clark <MCLARK@idem.IN.gov>
Subject: Re: Comments Requested - Proposed Geist Reservoir Conservancy District

No problem, just let me know. Thank you!

Bella Foster

Water Planner II
Indiana Department of Natural Resources
Division of Water
317-232-1507
IsFoster@dnr.IN.gov
www.dnr.IN.gov

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From: Mettler, Martha Clark <MCLARK@idem.IN.gov>
Sent: Tuesday, December 9, 2025 12:05:15 PM
To: Foster, Isabella C <IsFoster@dnr.IN.gov>
Subject: RE: Comments Requested - Proposed Geist Reservoir Conservancy District

Thanks Bella, I am coordinating with others in the agency – I may need you to provide more people with access to the files.

From: Foster, Isabella C <IsFoster@dnr.IN.gov>
Sent: Tuesday, December 9, 2025 6:38 AM
To: Mettler, Martha Clark <MCLARK@idem.IN.gov>
Subject: Comments Requested - Proposed Geist Reservoir Conservancy District

Good Morning,

The Department of Natural Resources Division of Water has received a petition for the establishment of Geist Reservoir Conservancy District and is requesting your assistance in its review. The proposed district will have the purposes of (1) developing forests, wildlife areas, parks and recreational facilities in connection with beneficial water management, and (2) operation, maintenance and improvement of works of improvement including but not limited to Geist Reservoir and will have boundaries that include all waterfront parcels on Geist Reservoir, and all areas of Geist Reservoir, with the dam as the southwest boundary and Florida Road as the northeast boundary. 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.

Thank You,

Bella Foster

Water Planner II

Indiana Department of Natural Resources

Division of Water

317-232-1507

lsFoster@dnr.IN.gov

www.dnr.IN.gov

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Exhibit C

Comments from Local Agencies

From: [Morgan Bennett](#)
To: [Foster, Isabella C](#)
Subject: RE: Comments Requested - Proposed Geist Reservoir Conservancy District
Date: Wednesday, December 10, 2025 11:53:22 AM

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Bella,

Thank you for reaching out regarding the proposed Geist Reservoir Conservancy District. Based on my review, this area appears to fall fully within the jurisdiction of the City of Fishers Health Department, so you may wish to contact them directly for input.

The project does sound interesting. Since it is outside our jurisdiction, I'm not certain my comments would carry weight. However, I do serve on the Hamilton County Wellhead Protection Committee, and this may be a topic worth sharing with that group. Gary Duncan, the Hamilton County Surveyor, serves as the committee's chairman.

Please don't hesitate to let me know if you need any additional information or assistance from our office.

Best regards,

Morgan Bennett
Senior Environmental Health Specialist
Program Coordinator
Hamilton County Health Department
18030 Foundation Dr.
Noblesville, IN 46060
Phone: 317-776-8500
morgan.bennett@hamiltoncounty.in.gov



Serving Our Community – Strengthening Our Future



From: Foster, Isabella C <IsFoster@dnr.IN.gov>
Sent: Tuesday, December 9, 2025 8:46 AM
To: Health <health@hamiltoncounty.in.gov>

Subject: Comments Requested - Proposed Geist Reservoir Conservancy District

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Good Morning,

The Department of Natural Resources Division of Water has received a petition for the establishment of Geist Reservoir Conservancy District and is requesting your assistance in its review. The proposed district will have the purposes of (1) developing forests, wildlife areas, parks and recreational facilities in connection with beneficial water management, and (2) operation, maintenance and improvement of works of improvement including but not limited to Geist Reservoir and will have boundaries that include all waterfront parcels on Geist Reservoir, and all areas of Geist Reservoir, with the dam as the southwest boundary and Florida Road as the northeast boundary. I have attached a letter and related documentation for your consideration and will factor your comments in our fact-finding report that will be presented to the Natural Resources Commission.

Thank You,

Bella Foster

Water Planner II

Indiana Department of Natural Resources

Division of Water

317-232-1507

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From: [Derek Adams](#)
To: [Foster, Isabella C](#)
Subject: Comments Requested - Proposed Geist Reservoir Conservancy District
Date: Tuesday, December 9, 2025 10:51:34 AM

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Ms. Foster,

Thank you for sending over the documentation regarding the proposed Geist Reservoir Conservancy District.

After reviewing the documents, exhibits and otherwise, the Hancock County Health Department has determined that, at this time, the Department has no comment on the information submitted.

Please let us know if there are any additional comments, questions, or concerns. I can be reached at this email address or the phone number listed below!

Thank You,

Derek M. Adams, BES, CPO
Environmental Health Specialist

Hancock County Health Department
111 American Legion Pl Ste. 150, Greenfield, IN 46140
P: (317) 477-1125

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