

**MEMORANDUM**  
**Comfort Lake-Forest Lake Watershed District**

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**To:** Plan Amendment Review Agencies **Date:** November 1, 2017  
**From:** Comfort Lake-Forest Lake Watershed District  
**Subject:** Proposed Watershed Management Plan Amendment

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**Introduction**

The Comfort Lake-Forest Lake Watershed District (CLFLWD) is proposing a minor amendment to its 2012-2021 Watershed Management Plan (Plan). The purpose of this memo is to provide an outline of each amendment item and explanation for why the revision is proposed. The outline below contains each activity that is either being added, deleted, or revised as part of the amendment. A brief explanation for the addition/deletion/revision is provided. Full proposed amendment language can be found in the attached documents. For the sake of brevity, explanations are short. More details can be obtained by contacting CLFLWD Watershed Technician, Emily Heinz at [emily.heinz@clflwd.org](mailto:emily.heinz@clflwd.org) or (651) 395-5856.

In general, the purpose of the amendment is to incorporate new projects that have been identified through diagnostic work, and to modify formatting so that the Plan more closely aligns with the annual budget.

Note that activity identifier codes will follow the proposed amendment. For example, several activities are proposed to be deleted from the 5221 Moody Lake project category. Proposed lettering takes these deletions into account; items that are deleted or moved from a certain section are not lettered within that section (if moved, they are lettered in the section they've been moved to).

**Proposed Amendment Explanations**

**Section 2 – INTRODUCTION**

The location map of the District (Figure 1) has been updated per the District's recent boundary change. The change occurred in two sections along the boundary with Rice Creek Watershed District.

**Section 4 - IMPLEMENTATION**

**4.5 Programs (3000 Series)**

4.5.0 General Program Development

- This was added in order to keep the Plan formatting consistent with budget formatting.

4.5.2 Permitting (3002)

- Program Description: Language added to address the District's ongoing inspections and reporting associated with past permit BMPs.
- Progress Evaluation Metrics: Language added to incorporate feedback from progress evaluation/progress report drafting process throughout 2016 and early 2017. Additional ways to quantify progress are proposed.

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#### 4.5.4 Non-Point Source Pollution Abatement Program (3004)

- Progress Evaluation Metrics: Language has been changed in order to move away from the original mentality of measuring progress based on how much money is spent. Spending money doesn't necessarily mean that goals are being reached. Other metrics for evaluating program effectiveness are proposed.

#### 4.5.5 Education and Outreach (3005)

- B. Summer Boat Launch Monitoring: Deleted. Incorporated under new item 3011B.
- Progress Evaluation Metrics: Language added to include more specific guidelines for measuring progress in the program. Initial metric is open to interpretation, which can be a good thing, but doesn't provide much structure for evaluation. Proposed metric aims to provide more structure, but still leave room for other ideas.

#### 4.5.9 Grant Research and Preparation (3009)

- New program added to keep Plan formatting consistent with budget formatting.

#### 4.5.10 Operations and Maintenance (3010)

- New program added to keep Plan formatting consistent with budget formatting.

#### 4.5.11 Aquatic Invasive Species Prevention and Management (3011)

- New program added to keep Plan formatting consistent with budget formatting. Unlike 3009 and 3010, this program contains elements that were already present in the Plan. Most of these elements were contained under individual lakes in the Projects section (5000 Series). The objective for combining all of these items under one program umbrella is to address AIS in a consistent and comprehensive manner district-wide. Below are subsections for specific activities under this program.

##### A. (District-Wide) Comprehensive Plan and Policy Development

- Over the past three years the District's involvement in AIS prevention and management has grown exponentially. This program has largely grown through the adaptive management feedback loop. The development of a comprehensive plan and policy will allow this program to take a more formal shape, while still allowing room for adaptive changes over time. This activity would develop a clear policy, targeted goals, and specific procedures for implementing this complex and multi-faceted program.

##### B. (District-Wide) Watercraft Inspections

- This activity would replace the existing Plan item, "3005B Summer Boat Launch Monitoring." Proposed language is based on three main sources: other organizations' AIS plans (e.g. DNR's State Management Plan for Invasive Species), the District's experiences with the program since its conception, and public/interagency input received in late 2016/early 2017.

##### C. (District-Wide) AIS Prevention at Boat Launch Sites

- Modified from recent budget line item, "Boat Launch Site Upgrades". This will be an ongoing activity for the District to keep track of. There is always room for improvement on educational signage and resources at public boat

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launches, especially considering the ever-changing climate of AIS in Minnesota.

- D. (District-Wide) AIS Early Detection and Rapid Response
  - This activity would incorporate two recent budget line items: “Rapid Response Fund” and “Zebra Mussel Monitoring”. By combining these two closely-related line items into a single activity, the District can address them in a comprehensive way while leaving room for additional related activities such as the drafting of early detection rapid response planning documents.
- E. (District-Wide) Invasive Species Pilot Control Projects
  - This is an existing activity in the Plan, simply moved to a new location. One minor revision is proposed with regard to Forest Lake and zebra mussels/starry stonewort.
- F. (District-Wide) Point-Intercept Macrophyte Survey
  - Modified version of the existing “Macrophyte and Invasives Survey” with specific mention of invasive species taken out. The thought here is to move the “invasives survey” piece into the next line item, “Aquatic Invasive Species Management”. The purpose of this activity will be to focus on performing periodic point-intercept surveys on lakes that include all macrophytes. Invasives won’t be the focus of these surveys, but they would still be part of them.
- G. (District-Wide) Aquatic Invasive Species Management
  - Language for this activity comes from multiple sources including the current Plan, Minnehaha Creek Watershed District’s long-term AIS plan, and the District’s experience with AIS management activities over the past few years. This section is kept relatively broad, with the plan of establishing more detailed specifics under activity 3011A Comprehensive Plan and Policy Development.
- H. (District-Wide) Rough Fish Management
  - This activity previously existed under several individual lake sections. It includes all of the same language that currently exists within the Plan, plus some additional details on fish surveys that seem particularly relevant to this activity.

#### 4.6 Projects (5000 Series)

##### 4.6.0 General Project Development

- This was added in order to keep the Plan formatting consistent with budget formatting.

##### 4.6.2 Lakes (5200 Series)

###### 5220 District-Wide

- Invasive Species Control Pilot Projects: Moved to 3011E.
- C. Chemical Treatment of Inflows: Moved up from item D to C.

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#### 5221 Moody Lake

- Curly-Leaf Pondweed Management: Deleted. Aspects are incorporated under new item 3011G.
- B. (CIP) Moody Lake Diagnostic Study Implementation: New item that includes activities outside of the Moody wetland rehabilitation project, such as the Lofton pond alum treatment and other potential projects resulting from the study.
- C. Alum Treatment: Minor addition regarding Diagnostic Study Implementation.
- Rough Fish Management: Deleted. Incorporated under new item 3011H.
- Macrophyte & Invasives Survey: Deleted. Aspects are incorporated under new item 3011F.

#### 5222 Bone Lake

- Curly-Leaf Pondweed Management: Deleted. Aspects are incorporated under new item 3011G.
- Alum Treatment: Moved up from F to E.
- Macrophyte & Invasives Survey: Deleted. Aspects are incorporated under new item 3011F.
- Rough Fish Management: Deleted. Incorporated under new item 3011H.
- F. (CIP) Bone Lake Diagnostic Study Implementation: New item added to allow for implementation of activities identified through diagnostic study that was completed in 2015.

#### 5223 Birch Lake

- A. Phosphorus Source Assessment & Implementation Plan: Revised to refer to Little Comfort Phosphorus Source Assessment & Implementation Plan (5225D) which will address Birch Lake.

#### 5224 School Lake

- Added note to refer to Little Comfort Phosphorus Source Assessment & Implementation Plan (5225D) which will address School Lake.

#### 5225 Little Comfort Lake

- Curly-Leaf Pondweed Management: Deleted. Aspects are incorporated under new item 3011G.
- Rough Fish Management: Deleted. Incorporated under new item 3011H.
- C. Alum Treatment: Moved up from E to C.
- Macrophyte & Invasives Survey: Deleted. Aspects are incorporated under new item 3011F.
- D. (CIP) Little Comfort Lake Phosphorus and Sediment Source Assessment Implementation: New item to allow for implementation of activities identified through in-progress 5225A Phosphorus Source Assessment.

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#### 5226 Shields Lake

- Rough Fish Management: Deleted. Incorporated under new item 3011H.
- Curly-Leaf Pondweed Management: Deleted. Aspects are incorporated under new item 3011G.
- B. Shoreline Survey: Moved up from item D to B.
- Macrophyte & Invasives Survey: Deleted. Aspects are incorporated under new item 3011F.
- C. Shields Lake Diagnostic Study and Implementation Plan: New item to retroactively incorporate completed diagnostic study.
- D. (CIP) Shields Lake Diagnostic Study Implementation: New item to allow for implementation of activities identified through the Shields Diagnostic Study.

#### 5227 Sylvan Lake

- Macrophyte & Invasives Survey: Deleted. Aspects are incorporated under new item 3011F.

#### 5228 Forest Lake

- B. (CIP) Forest Lake Diagnostic Study Implementation: More detail added per EOR input from experience with ongoing study.
- Macrophyte & Invasives Survey: Deleted. Aspects are incorporated under new item 3011F.
- Aquatic Macrophyte and Invasive Species Management: Deleted. Aspects are incorporated under new item 3011G.
- [Items 5228F-J re-labeled to account for deleted items above]
- K. Washington Judicial Ditch 6 Assessment and Implementation Plan: New item added to incorporate recent acquisition of ditch authority.
- L. (CIP) Washington Judicial Ditch 6 Improvements Implementation: New item added to allow for implementation of activities identified through WJD 6 Assessment and Implementation Plan.

#### 5229 Comfort Lake

- Macrophyte & Invasives Survey: Deleted. Aspects are incorporated under new item 3011F.

#### 4.6.4 Wetlands (5400 Series)

#### 5422 Bone Lake

- G. Wetland Restoration Feasibility & Design (all SBL subwatersheds): New item added to more accurately represent necessary feasibility and design components of in-progress Bone Lake Partially Drained Wetland Restorations project.
- H. (CIP) Wetland Restoration Implementation (all SBL subwatersheds): New item added for implementation portion of Bone Lake Partially Drained

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Wetland Restorations project. Language also allows for implementation of other potential projects down the line.

#### CIP Implementation Schedule and Cost Table

The Implementation Schedule and Cost Table has been updated to include new amendment line items. Additionally, projected costs for some otherwise un-amended line items from the Plan have been revised to reflect the latest budget outlook. Specific explanations for revising these items are provided below. On the Implementation Schedule and Cost Table revised costs are shown in red underlined text and highlighted in yellow.

- 1003 General Administration: Budget figures for staff time are based on annual work plan; some dollars are allocated to administration, but majority is allocated to programs and projects.
- 1004 Professional Services: This item has always been part of the Plan, but was never specifically included in the CIP table. Adding it in now with latest projected costs so that yearly CIP totals align more closely with actual budget outlook.
- 3002A Permitting Ongoing Initiatives: Updated to reflect latest projected costs. Permitting program activity has been steadily increasing since 2010, with more large multi-residential and commercial developments occurring each year.
- 3004E Municipal Stormwater Remediation Cost-Share Program: Updated to reflect latest projected costs. District has budgeted for this program in the past but has historically not used the funding.
- 3005A Education and Outreach Ongoing Initiatives: By popular demand, the District has significantly increased its education and outreach efforts in recent years with the addition of outreach-focused staff members and increased event coordination. The District continues to participate in EMWREP as well.
- 5220A&B District-Wide Volume Control Facility: Did not complete in prior years as CIP indicated. Planning to complete throughout 2017-2020.
- 5221C Moody Lake Alum Treatment: Planning for completion in 2019 after upstream wetland restorations are complete.
- 5222E Bone Lake Alum Treatment: Planning for completion in 2020 after upstream and watershed loading are addressed.
- 5225A Little Comfort Lake Phos. Source Assessment & Impl. Plan: Adaptive management monitoring and project planning from 2017-2021. Will be used to target most cost-effective projects in the Little Comfort lake management district.
- 5227A&B Sylvan Lake Stormwater and Shoreline BMPs: Was not completed in 2014-2015 as CIP previously indicated. Planning to complete in 2017-2019.
- 5228B Forest Lake Diagnostic Study Implementation: The diagnostic study has identified multiple priority areas for project implementation. Four main priorities for the short-term are broken out in the CIP table in order to assist the District with financial planning. These tasks are rolled into the same activity within the body of the WMP.

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- 5228B1 Street Sweeping Plan: This activity created a prioritized street sweeping plan to target the most cost-effective methods for load reductions.
- 5228B2 Street Sweeping Implementation: This activity will implement the plan described above, addressing loading from the Forest Lake direct drainage area.
- 5228B3 Castlewood Golf Course: This activity will address loading from the Castlewood Golf Course area located to the south of the middle basin.
- 5228B4 Hayward Avenue: This activity will address loading from the Hayward Avenue area located to the east of the west basin.
- 5228D Forest Lake Urban Stormwater Retrofit Implementation: Forest Lake direct-drainage projects (Hilo Lane, 3<sup>rd</sup> Lake Pond) completed in 2017 were not as costly as CIP previously indicated (decreased by \$400,000).
- 5229G Comfort Lake Bixby Park Stormwater Treatment: Decreased annual costs by roughly \$1M each year because project is now complete and final costs were much lower than anticipated (previously, CIP had ~\$6M for total project).
- 5340A Sunrise Stream Assessment: Was not completed in 2012 as CIP previously indicated. Planned for 2018.
- 5421A Moody Lake Wetland Restoration and Cattle Exclusion: Was not completed in 2011 as CIP previously indicated. Phase 1 completed in 2017 and subsequent phases planned for 2018.
- 5628A&B Sylvan Lake Groundwater Protection Feasibility Study: Was not completed in 2015-2015 as CIP previously indicated. Planned for 2018-2020.
- 5628B Forest Lake GW-Dep. Nat. Res. Interpretive Feature: Was not completed in 2017 as CIP previously indicated. Not slated for immediate future as surface water quality-focused projects are taking priority.

### **Section 8 – INTERGOVERNMENTAL COORDINATION AND IMPACT**

Updates to table 7, “Local Plan Adoption Deadlines”, have been made to reflect current status of local plan approvals. Additionally, the map of lake management districts (Figure 6) immediately before this section has been updated, per the District’s recent boundary change.

### **Section 9 – AMENDMENTS TO THIS PLAN**

Language updated to match current 8410 statute.

#### **Attached:**

- Proposed Amendment Summary (contains amended language only and includes stricken portions)
- WMP Vol I Proposed Amendment (full volume 1 of plan; revised portions shown in red and underlined; proposed stricken portions are removed)