



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

**Date:** February 26, 2026  
**To:** CLFLWD Board of Managers  
**From:** Mike Kinney, District Administrator  
**Subject:** 2026 AIS Prevention and Management Plan



**District Wide**

**Background/Discussion:**

The proposed 2026 Aquatic Invasive Species Prevention and Management Plan is attached. The plan focuses on seven lakes: Moody, Keewahtin, Bone, Shields, Little Comfort, Comfort, and Forest. Annual surveys for aquatic invasive species (AIS) are continued in 2026 and planned treatments for 2026 are based on 2025 activities and historical average AIS treatment acreage for individual lakes.

The 2026 Watercraft inspector budget allocation has decreased by \$5,000 compared to 2025. However, inspection hours will remain the same as a Conservation Corps member will conduct Friday inspections. Further details are provided for each lake in the attached plan.

District staff recommends the Board approve the attached 2026 CLFLWD AIS Prevention and Management Plan.

**Recommended Motion:**

Proposed Motion: Manager \_\_\_\_\_ moves to approve the 2026 CLFLWD AIS Prevention and Management Plan. Seconded by Manager \_\_\_\_\_.

**Attached:**

Draft 2026 AIS Prevention and Management Plan

# 2026 Aquatic Invasive Species Prevention and Management Plan



**Forest Lake**

**Bone Lake**

**Comfort Lake**

**Shields Lake**

**Moody Lake**

**Little Comfort Lake**

**Lake Keewahtin**



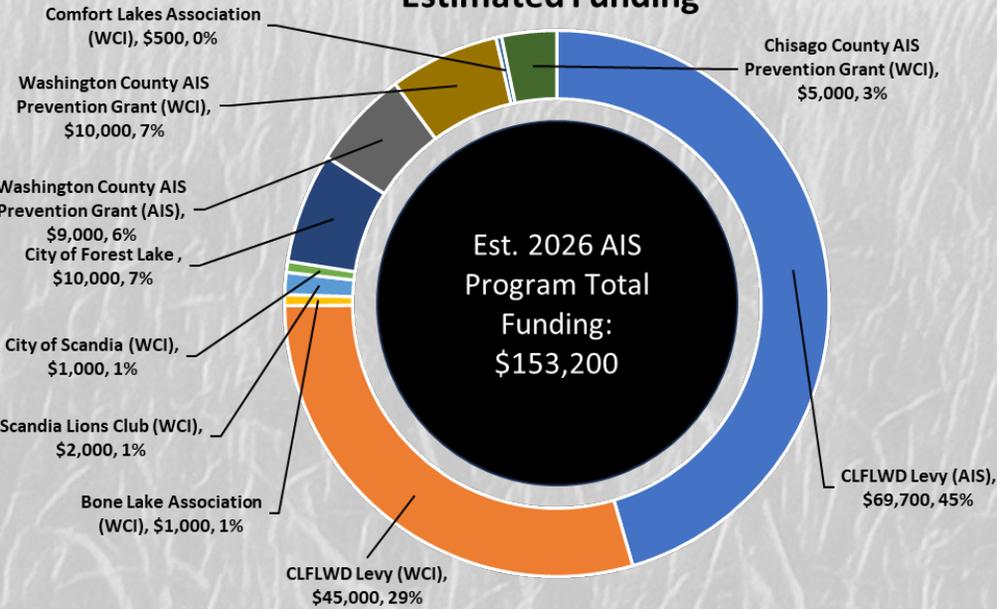
**CLFLWD**  
WATERSHED DISTRICT



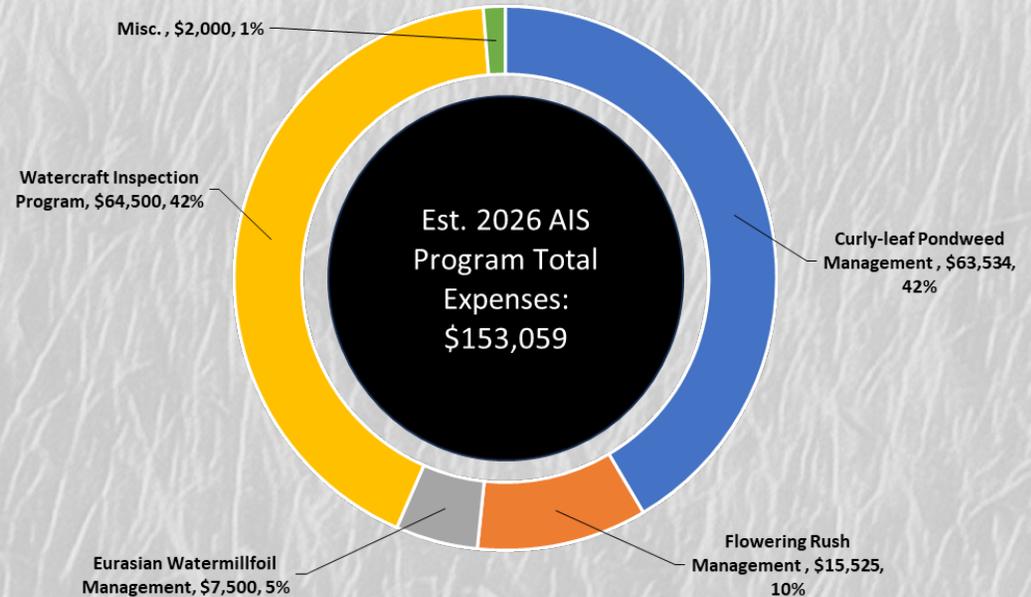
# District Wide AIS Budget

## 2026 AIS Management Budget

### CLFLWD's 2026 District-Wide AIS Management Program Estimated Funding



### CLFLWD's 2026 District-Wide AIS Management Program Estimated Expenses

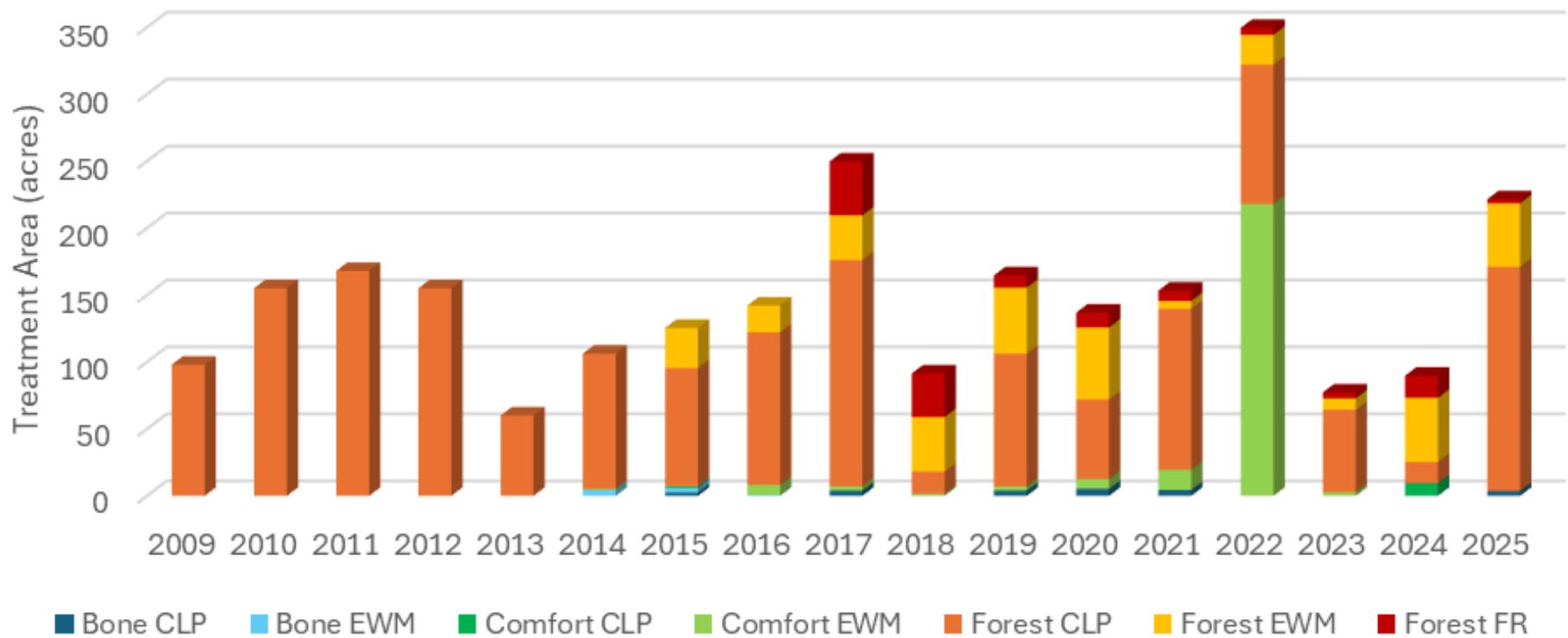


\*Estimated CLP expenses use historical AIS treatment average acreage from previous years that required treatment

# District Wide Historical Treatments

## CLFLWD Annual Treatment for AIS

CLFLWD Historical Large Lake Total Treatment Area



Curly-leaf pondweed – CLP  
Eurasian watermilfoil – EWM  
Flowering Rush – FR



# Moody Lake

## 2026 AIS Management Plan

District Staff performing winter lake profile monitoring

### Aeration System

- **Operation:** The District will continue the operation of the Moody Lake aeration system in winter months to increase dissolved oxygen, reduce winter fish-kills, and support a healthy fishery that suppresses invasive fish populations. The aeration system was activated on **February 11th**; this is the 11th consecutive winter the District has run the aerator.
- **Monitoring:** Oxygen levels are monitored throughout the winter, once dissolved oxygen approaches the 5mg/L threshold the aeration system will be activated.

### Curly-leaf Pondweed (CLP)

- **History:** no CLP has been treated on Moody Lake 2021-2025.
  - **2019:** 7.81 acres
  - **2020:** 3.1 acres
- **AIS Survey:** Staff will perform AIS assessment surveys to determine if CLP treatments will be necessary for future planning purposes.

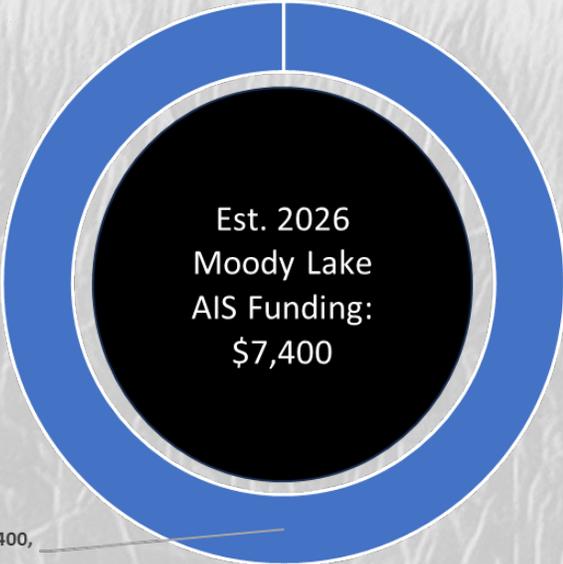
### Native Aquatic Plant Transplanting Project - 2023

- **History:** District staff and a researcher from the University of Minnesota implemented a native aquatic plant transplanting project on Moody Lake. A variety of native species were collected from Keewahtin Lake and planted in Moody Lake.
- **Monitoring:** In 2026 staff will perform assessments of the aquatic plant transplant locations with the purpose of evaluating the research projects effectiveness.

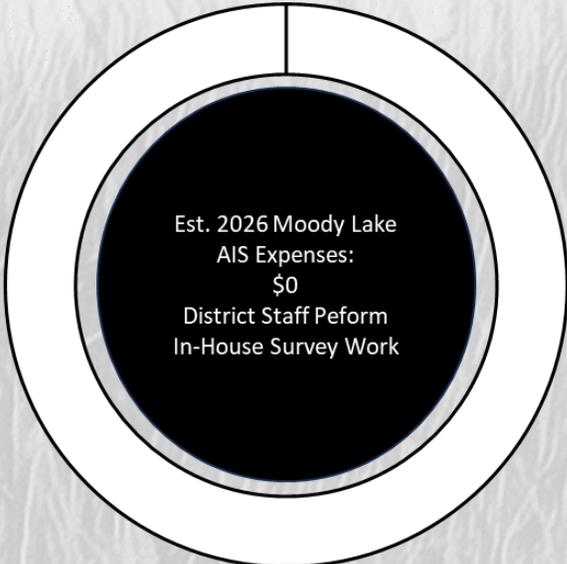


# Moody Lake - 2026 Budget Summary

CLFLWD's 2026 Moody Lake AIS Estimated Funding



CLFLWD's 2026 Moody Lake AIS Program Estimated Expenses



CLFLWD Levy , \$7,400,  
100%



# Bone Lake

## 2026 AIS Management Plan

### Curly-leaf Pondweed (CLP)

- **History:** Yearly surveys have been conducted by BWS to determine CLP growth on Bone Lake. Treatment has occurred in 5 of the last 11 years, with the latest being in 2025 for 3.66 acres.
- **Planned Activities**
  - **Survey:** BWS delineation and assessment for CLP
  - **Treatment:** Determined by initial BWS delineation

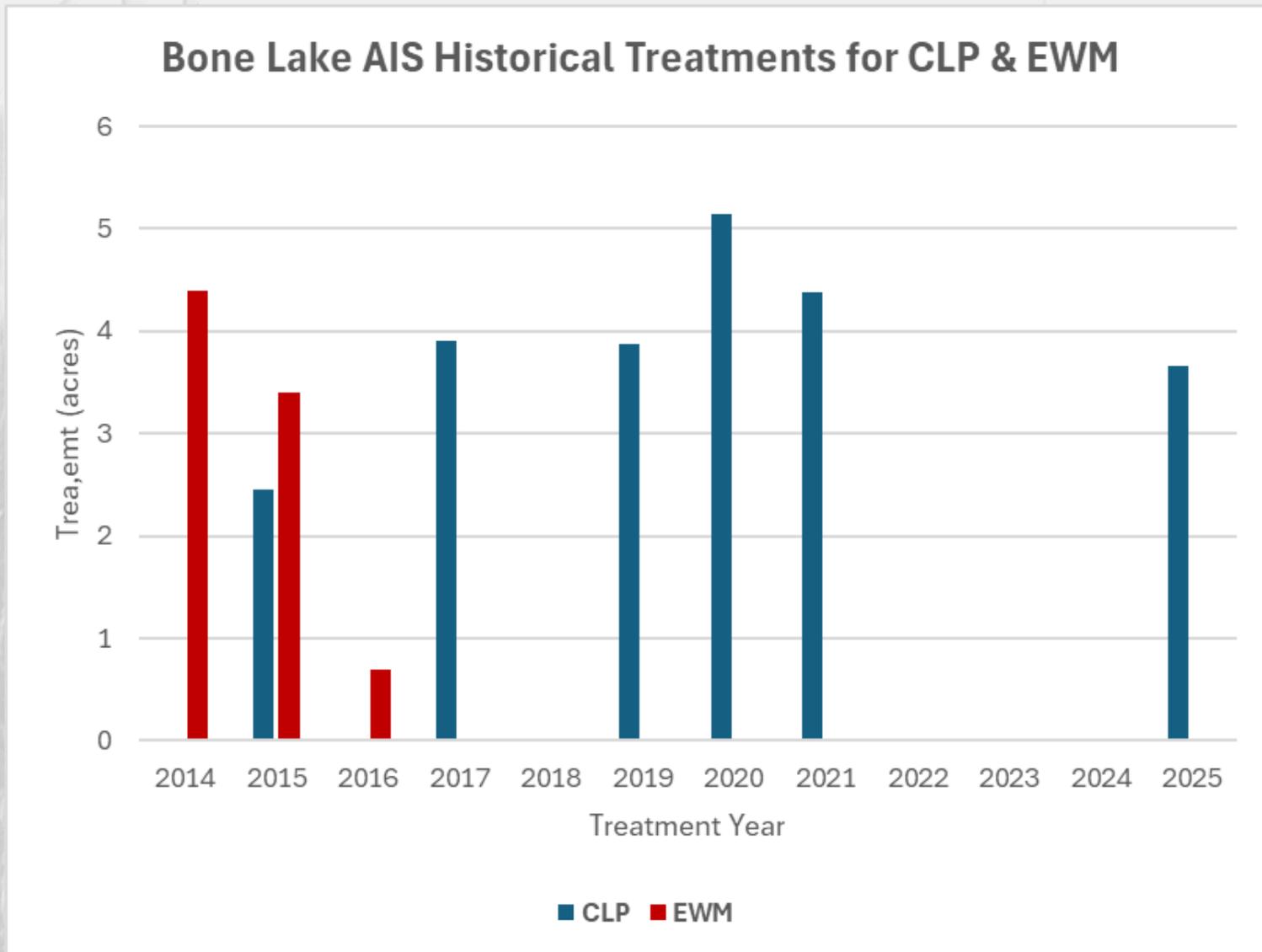
### Eurasian watermilfoil (EWM)

- **History:** Yearly surveys have been conducted by BWS to determine EWM growth on Bone Lake. EWM has decreased on Bone Lake with no treatment needed since 2016
- **Planned Activities**
  - **Survey:** BWS delineation and assessment for EWM
  - **Treatment:** No treatment is budgeted for the 2026 season



BWS CLP Assessment Survey  
Rake with aquatic vegetation

# Bone Lake – Historical AIS Treatment Area



## Average Historical Treatment Acreage

CLP – 3.90 acres

EWM – 3.37 acres



# Bone Lake – 2026 AIS Management Plan

## Zebra Mussels

- **History:** On May 28, 2019, six juvenile zebra mussels were discovered near the Bone Lake Public access dock. Following this discover an eradication attempt was conducted by the District and partners. However, on July 20, 2023, BWS found 3 juvenile zebra mussels while performing a point intercept survey. The discovery was communicated to the DNR and long-term population monitoring resumed.
- **Sampler Plates:** In 2026 Staff will continue the zebra mussel plate program with the assistance of volunteer citizens lakeshore owners.

## Rough Fish Management

- **Fish Barrier:** Staff will maintain and manage the stop logs for the inlet barrier and clear debris as necessary for both the inlet and outlet of Bone Lake.

## Watercraft Inspection Program

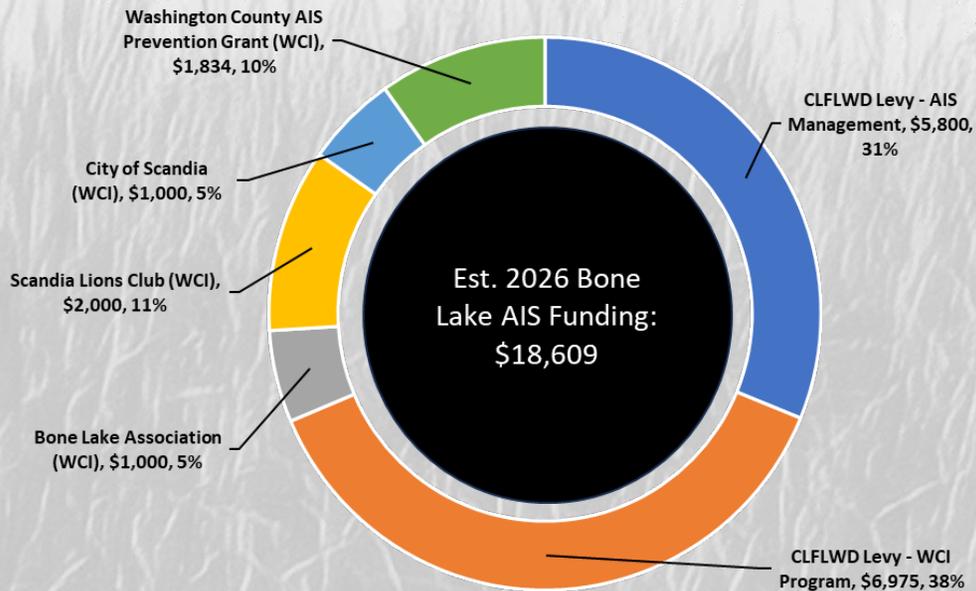
- **History:** In 2025 Watercraft inspectors performed 535 hours of inspections on Bone Lake which resulted in 535 inspections and associated surveys.
- **2026 Hours:** 545.1 hours\*

\*potentially increasing 2026 WCI hours for Bone Lake by 20-40 hours pending additional funding from Bone Lake Association

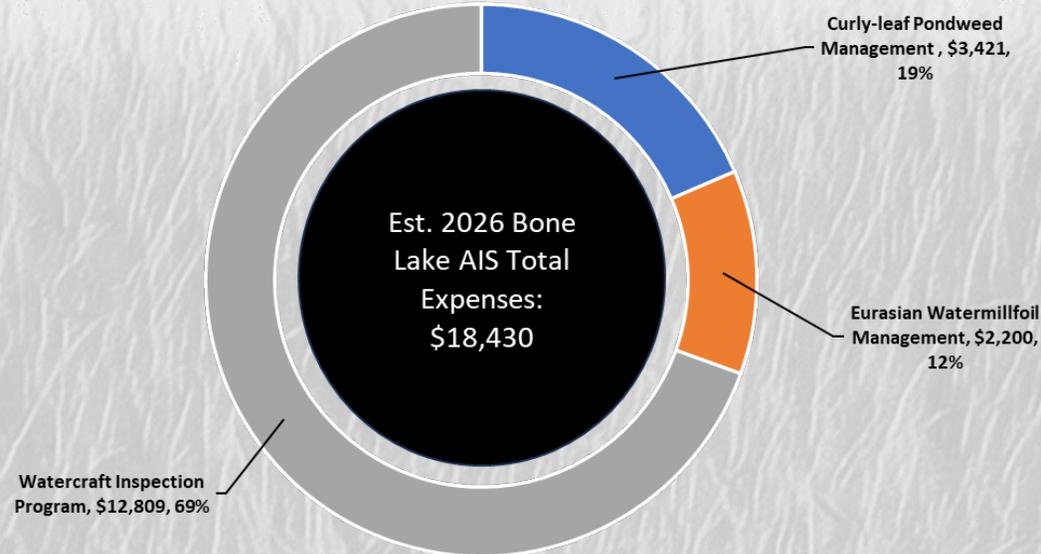


# Bone Lake - 2026 Budget Summary

## CLFLWD's 2026 Bone Lake AIS Estimated Funding



## CLFLWD's 2026 Bone Lake AIS Program Estimated Expenses



\*Financial contributions from the Bone Lake Association, Scandia Lions Club, & the City of Scandia are used exclusively for the Watercraft Inspection Program activities at the Bone Lake public launch

\*\*Estimated CLP expenses use historical AIS treatment average acreage from previous years that required treatment (3.90 acres)



# Little Comfort Lake

## 2026 AIS Management Plan

### AIS Tracking and Early Detection Survey

- **Overview:** District staff will perform an AIS tracking and early detection survey on Little Comfort Lake. This data will be used to assess the abundances of known species such as CLP, EWM, and Purple loosestrife. Additionally, this will also monitor for the presence of new invasive species.

### Curly-leaf Pondweed (CLP)

- **Overview:** Given the historical sparse growth of CLP in Little Comfort, there is likely no ecological or recreational threat. This has resulted in no treatments being budgeted for in 2026, and District staff will continue to monitor the overall growth with the purpose of determining if future treatments will be necessary.

### Eurasian watermilfoil (EWM)

- **History:** EWM was first discovered in Little Comfort Lake in 2023 by the MN Department of Natural Resources Invasive Species Program, though no treatments have been deemed necessary due to low population density.
- **Overview:** Given the historical sparse growth of EWM in Little Comfort, there is likely no ecological or recreational threat. This has resulted in no treatments being budgeted for in 2026 and like CLP, District staff will monitor population density.



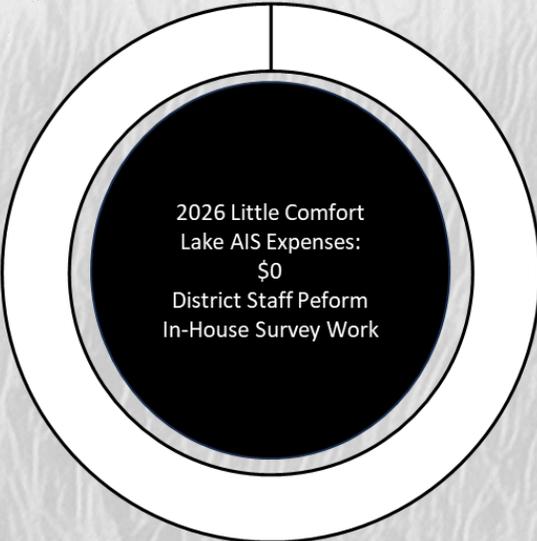
District Staff performing aquatic plant identification

# Little Comfort Lake - 2026 Budget Summary

CLFLWD's 2026 Little Comfort Lake AIS Funding



CLFLWD's 2026 Little Comfort Lake AIS Program Expenses



# Shields Lake

## 2026 AIS Management Plan

### Aeration System

- **Operation:** The District will continue the operation of the Shields Lake aeration system in winter months to increase dissolved oxygen, reduce winter fish-kills, and support a healthy fishery that suppresses invasive fish populations. The aeration system was activated on **January 31<sup>st</sup>**, this will be the 11th consecutive winter the District has run the aerator.
- **Monitoring:** Oxygen levels are monitored throughout the winter, once dissolved oxygen approaches the 5mg/L threshold the aeration system will be activated.

### Curly-leaf Pondweed (CLP)

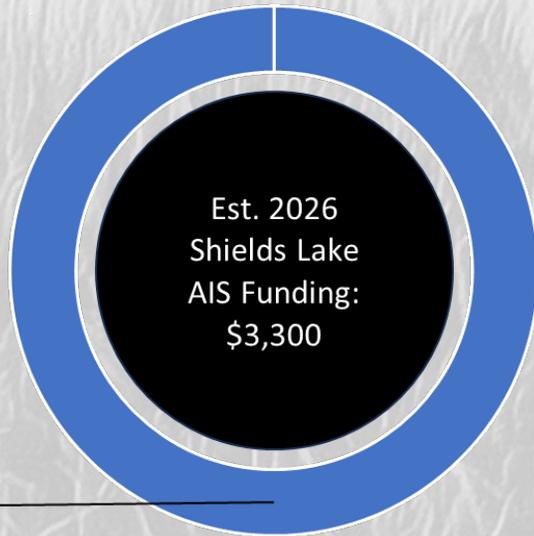
- **History:** Annual surveys have been conducted by BWS to determine CLP growth on Shields Lake. In 2025 Blue Water Science observed several areas with potential heavy growth but did not recommend any treatment to promote native aquatic plant growth. The historical average acreage for years that required CLP treatment is 2.89 acres
- **Planned Activities**
  - **Survey:** BWS delineation and assessment for CLP
  - **Treatment:** Potential CLP treatment, treatment acreage will be determined by 2026 BWS delineation.



CLP early winter growth from Shields Lake

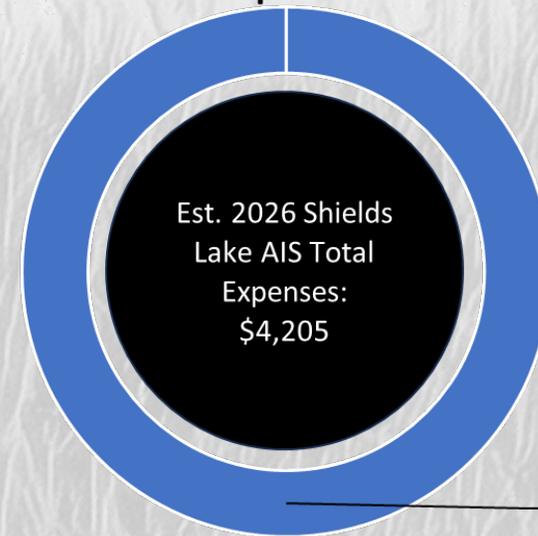
# Shields Lake - 2026 Budget Summary

## CLFLWD's 2026 Shields Lake AIS Estimated Funding



CLFLWD Levy ,  
\$3,300 , 100%

## CLFLWD's 2026 Shields Lake AIS Program Estimated Expenses



Curly-leaf Pondweed  
Management ,  
\$4,205 , 100%



\*Estimated CLP expenses use historical AIS treatment average acreage from previous years that required treatment (2.89 acres)

# Lake Keewahtin

## 2026 Management Plan

### AIS tracking and Early Detection Survey

- **Overview:** District staff will perform an AIS tracking and early detection survey on Lake Keewahtin. This data will be used to assess the abundances of known species such as CLP and Purple loosestrife. Additionally, this will also monitor for the presence of new invasive species.

### Purple Loosestrife (PL)

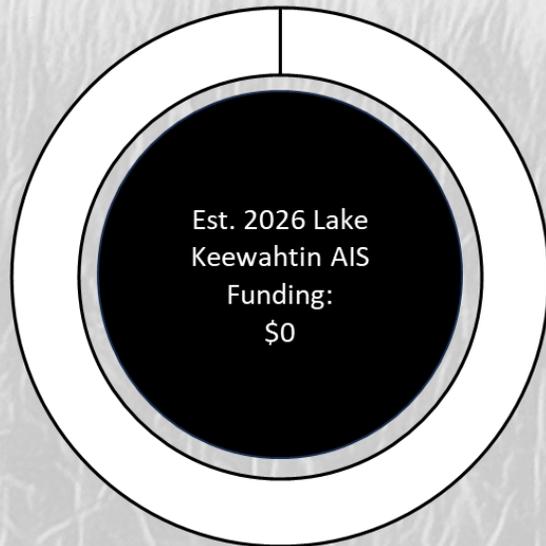
- **Overview:** In 2025 Staff performed a shoreline assessment of PL with the purpose of locating sites suitable for biocontrol management efforts following DNR guidelines. Suitable conditions with a large enough PL population and suitable accessibility have been identified adjacent to Keewahtin Ave and Highway 97.
- **Biocontrol Management:** In 2026 District staff will implement PL biocontrol management efforts following DNR beetle rearing and releasing guidelines. Additionally, staff will create a guidance document and potential outreach plan with the purpose of assessing the feasibility of expanding this into a citizen volunteer program in the 2027.



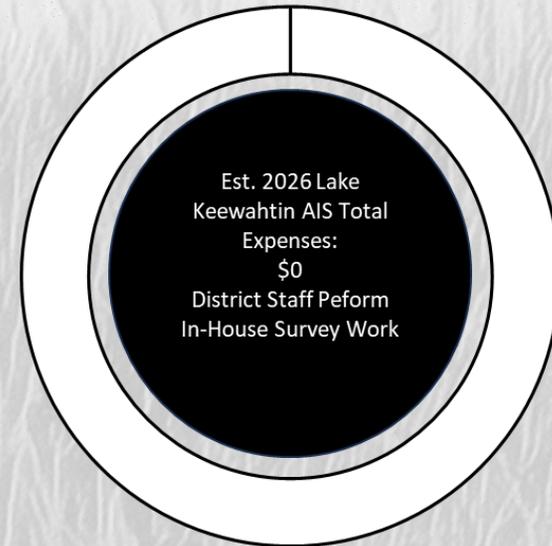
Purple  
loosestrife  
observed  
along Lake  
Keewahtin  
Shoreline

# Lake Keewahtin - 2026 Budget Summary

## CLFLWD's 2026 Lake Keewahtin AIS Estimated Funding



## CLFLWD's 2026 Lake Keewahtin AIS Program Estimated Expenses



# Forest Lake

## 2026 AIS Management Budget

### Curly-leaf Pondweed (CLP)

- **History:** Annual surveys have been conducted by BWS to determine CLP growth on Forest Lake and treatments have taken place since 2009. In 2025 CLP treatment acreage had a sizeable increase, 167.44 acres. Additionally, Flumioxazin was required to be used as a new strain of walleye fry which are susceptible to Diquat had been stocked by DNR Fisheries. Note this nearly doubles the cost of any treatment area.
- **Planned Activities**
  - **Survey:** BWS delineation and assessment for CLP
  - **Treatment:** Potential CLP treatment, treatment acreage will be determined by 2026 BWS delineation. Funds have been allocated for 2026 based on historical average treatment area acreage.  
**Additional Treatment Restriction:** In 2026 the District will use Flumioxazin for CLP treatment as no Diquat will be allowed until the month of June, which is outside the allowed treatment window for CLP.

### Eurasian watermilfoil (EWM)

- **History:** Annual surveys have been conducted by BWS to determine EWM growth on Forest Lake and treatments have taken place since 2015. CLFLWD provides the Forest Lake Lake Association (FLLA) with EWM delineation surveys which are then used for the management of EWM.
- **Planned Activities**
  - **Survey:** BWS delineation and assessment for EWM
  - **Treatment:** FLLA will coordinate the treatment management using the 2026 BWS delineation results.

### Zebra Mussels

- **Sampler Plates:** In 2026 Staff will continue the zebra mussel plate program with the assistance of volunteer citizens lakeshore owners.



# Forest Lake – 2026 AIS Management

## Flowering Rush (FR)

- **History:** The District's FR management program has been operating since 2014 and has been very successful at reducing overall abundance. The management program will be continued into 2026
- **Planned Activities**
  - **Survey:** BWS delineation and assessment for FR
  - **Treatment:** Large area treatments, spot treatments, and seedhead removal. Funds have been allocated for 2026 based on historical average treatment area acreage.



Flowering Rush with seed heads in bloom

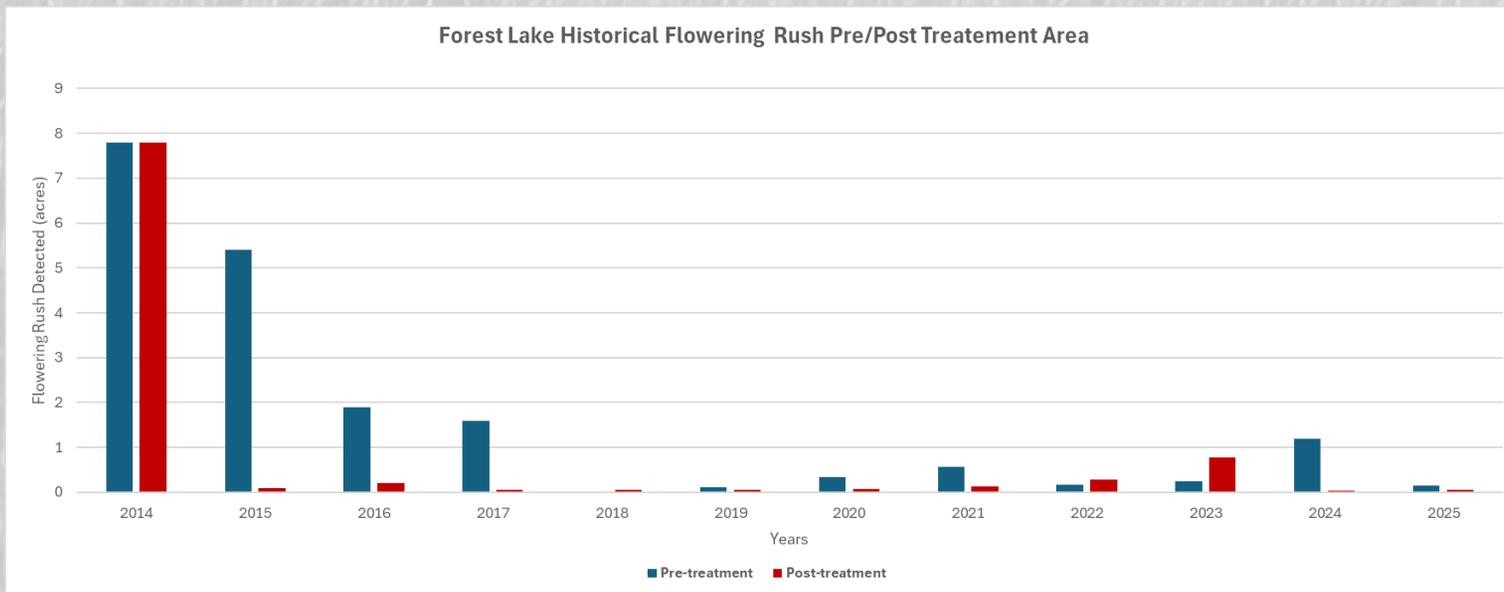
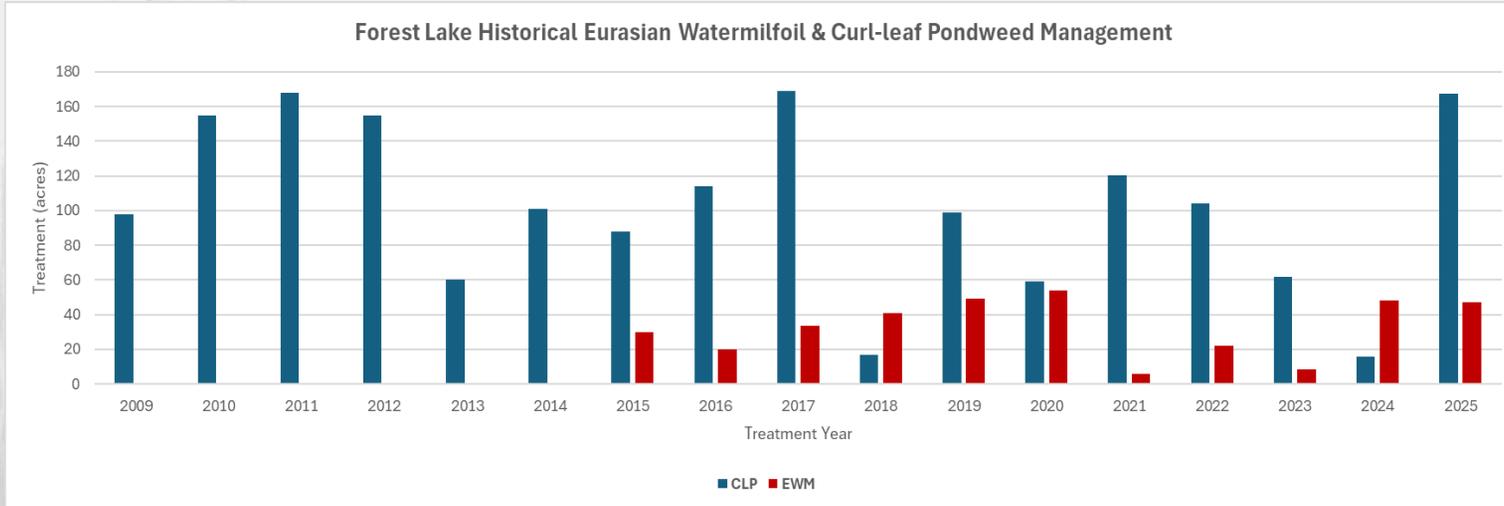
## Watercraft Inspection Program

- **History:** In 2025 Watercraft inspectors performed 2458.75 hours of inspections on Forest Lake which resulted in 4743 inspections and associated surveys.
- **2026 Hours:** 2401.8 hours Total Inspection Hours
  - Conservation Corps team member will contribute and estimated 208 Inspection Hours
  - DNR will contribute an estimated 525 Inspection Hours

## Purple Loosestrife (PL)

- **Overview:** In 2025 Staff performed a shoreline assessment of PL with the purpose of locating sites suitable for biocontrol management efforts following DNR guidelines. Suitable conditions with a large enough PL population and suitable accessibility have been identified adjacent to the Forest Lake #3 Public Launch.
  - **Biocontrol Management:** In 2026 District staff will implement PL biocontrol management efforts following DNR beetle rearing and releasing guidelines. Additionally, staff will create a guidance document and potential outreach plan with the purpose of assessing the feasibility of expanding this into a citizen volunteer program in the 2027.
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# Forest Lake – Historical AIS Annual Treatment Area



## Average Historical Treatment Acreage

CLP – 103.06 acres

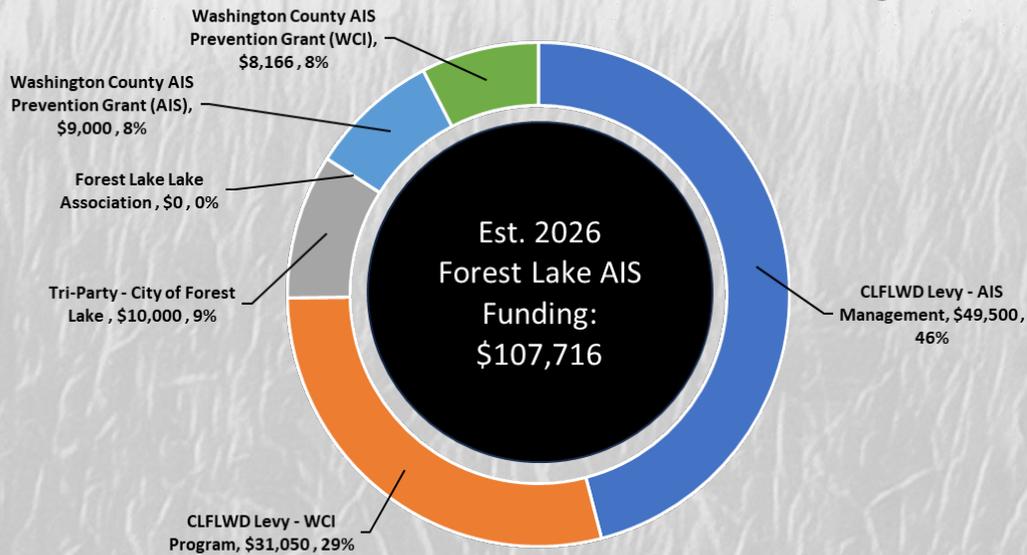
EWM – 32.09 acres

FR ~ 15 acres \*2-3 treatments per season

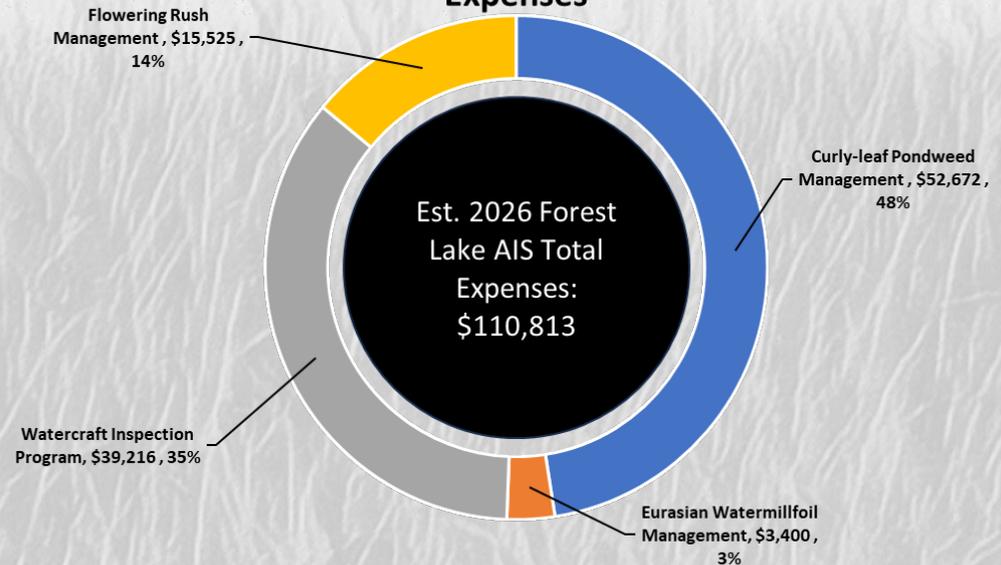


# Forest Lake - 2026 Budget Summary

**CLFLWD's 2026 Forest Lake AIS Estimated Funding**



**CLFLWD's 2026 Forest Lake AIS Program Estimated Expenses**



\*Estimated CLP expenses use historical AIS treatment average acreage from previous years that required treatment (103.06 acres)

# Tri-Party Agreement Purpose and Partners

**Overview:** Successful aquatic invasive species management requires a community wide effort. CLFLWD received considerable support across the district in it's efforts. This community partnership is codified on Forest Lake between CLFLWD, the City of Forest Lake, and the Forest Lake Lake Association (FLLA) in the Tri-Party agreement. The agreement ensures the financial cost of AIS management is shared by all three parties in a fiscally responsible manner which ensures stability and flexibility through reserve funds and equal contribution. The main points are listed below but is not an exhaustive list.

1. The district will carry out AIS management on Forest Lake according to its Watershed Management Plan
2. The city will carry out native plant harvesting and other activities to support recreation on Forest Lake
3. FLLA will assist with AIS management
4. The city will contribute \$63,750, the district \$63,750, and FLLA \$22,500
  - o The tri-party agreement covers the first \$150,000 spent on Forest Lake AIS. Any additional expenses beyond that are the responsibility of the spending party.
5. A shared agreement of expenditures
6. A reserve fund will be created if necessary
7. Each party determines and is responsible for its own activities

## **Tri-Party Agreement- 3-year agreement under consideration**

- Potential increase in 2027 and 2028 to account for rising expenses.
- Discussion on creating a 3-year agreement with escalation
- Partners discuss the reduction of CLP acreage treatment if necessary
- Weed harvester usage – 2027 decision



# Comfort Lake

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## 2026 AIS Management Plan

### Curly-leaf Pondweed (CLP)

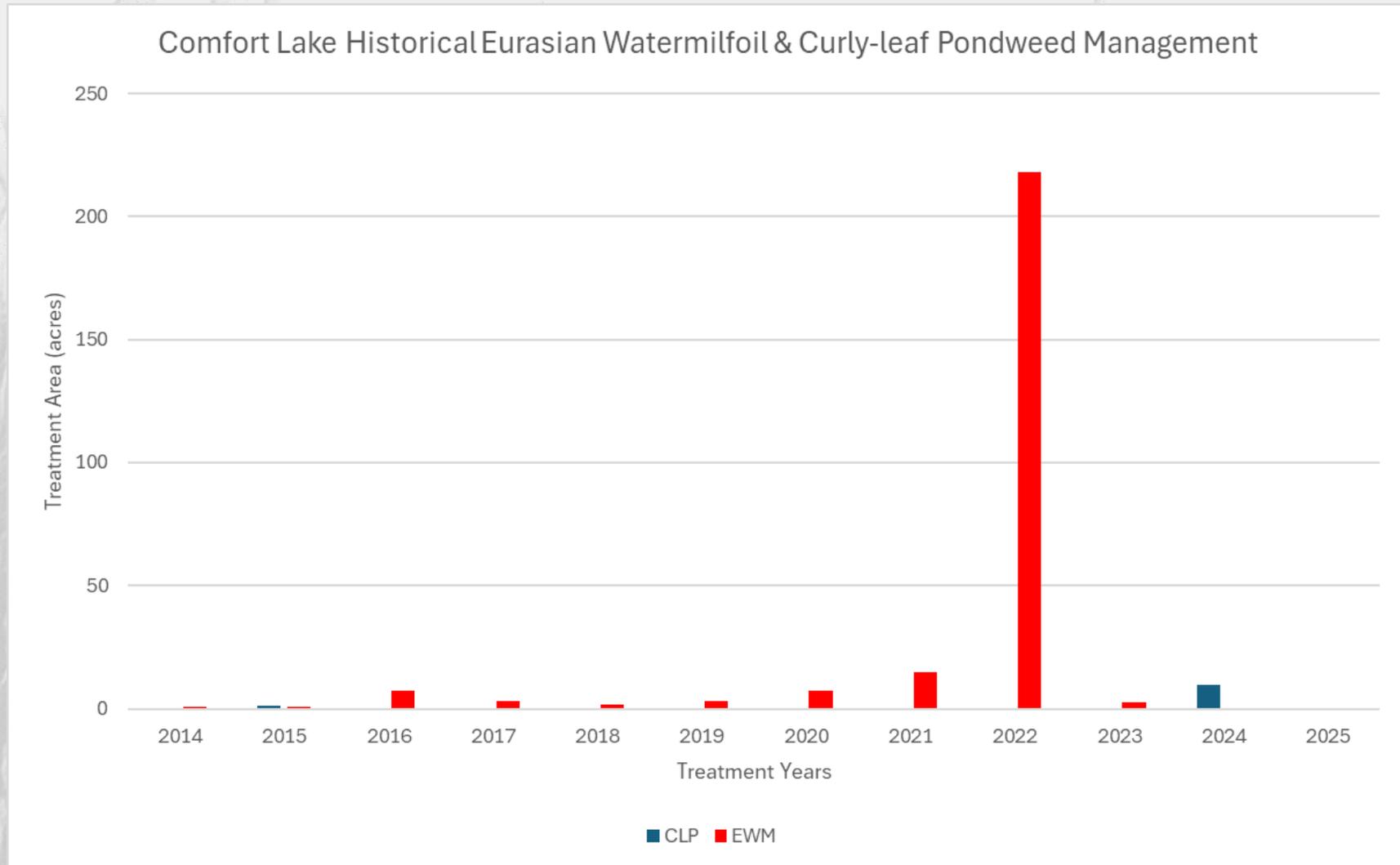
- **History:** Annual surveys have been conducted by BWS to determine CLP growth on Comfort Lake. CLP treatment was conducted on Comfort Lake in 2024 for the first time since 2015. No treatment was conducted in 2025.
- **Planned Activities**
  - **Survey:** BWS delineation and assessment for CLP
  - **Treatment:** Potential CLP treatment, treatment acreage will be determined by 2026 BWS delineation. Funds have been allocated for 2026 based on historical average treatment area acreage.

### Eurasian watermilfoil (EWM)

- **History:** Yearly surveys have been conducted by BWS to determine EWM growth on Comfort Lake. A lake wide treatment occurred in 2022 followed by a 2.77-acre treatment in 2023. In 2025 no treatment was recommended though a follow up assessment survey identified a potential area with light to moderate growth that may require treatment in 2026.
- **Planned Activities**
  - **Survey:** BWS delineation and assessment for EWM
  - **Treatment:** Potential EWM treatment, treatment acreage will be determined by 2026 BWS delineation.



# Comfort Lake – Historical AIS Treatment Area



## Average Historical Treatment Acreage

CLP – 5.23 acres

EWM – 4.66 acres \*does not include 2022 whole lake treatment



# Comfort Lake – 2026 AIS Management

## Zebra Mussels

- **History:** Zebra mussels were first discovered in Comfort Lake in 2017 and are now widely distributed around the lake. The University of Minnesota has conducted research regarding zebra mussel populations and the various external factors that may influence their productivity. Currently this program is transitioning into a long-term population study that will hopefully provide insights for future research and management.
- **Sampler Plates:** In 2026, the Comfort Lakes Association will likely continue to participate in the zebra mussel monitoring program being piloted by the University of Minnesota.

## Rough Fish Management

- **Carp Management:** Staff will continue to investigate potential partnerships and funding for a carp movement study that builds upon the carp population study that the Comfort Lake Association commissioned in 2024. Managers are also exploring funding avenues.

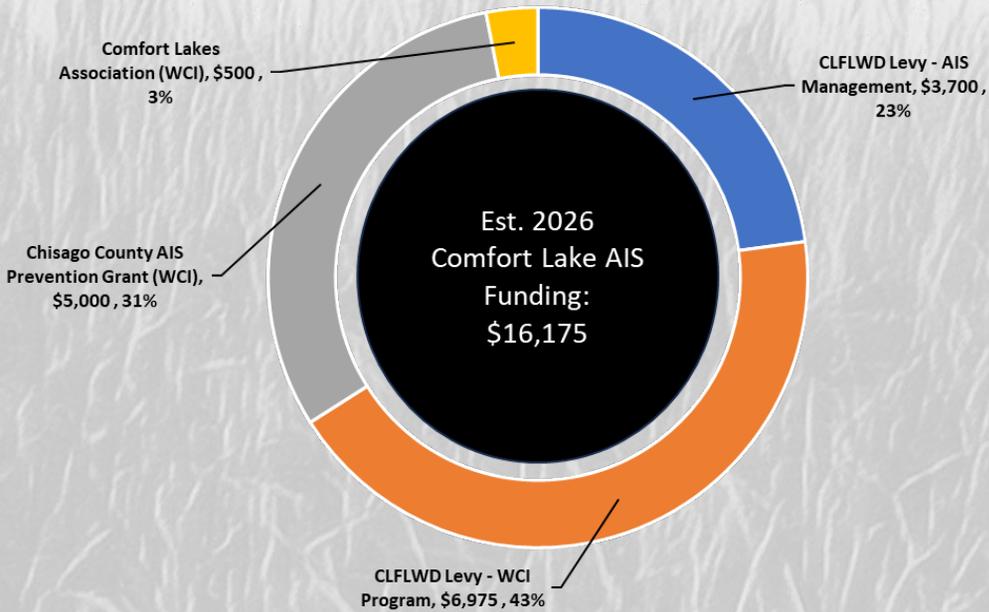
## Watercraft Inspection Program

- **History:** In 2024 Watercraft inspectors performed 562 hours of inspections on Comfort Lake which resulted in 775 inspections and associated surveys.
- **2026 Hours:** 530.85 hours

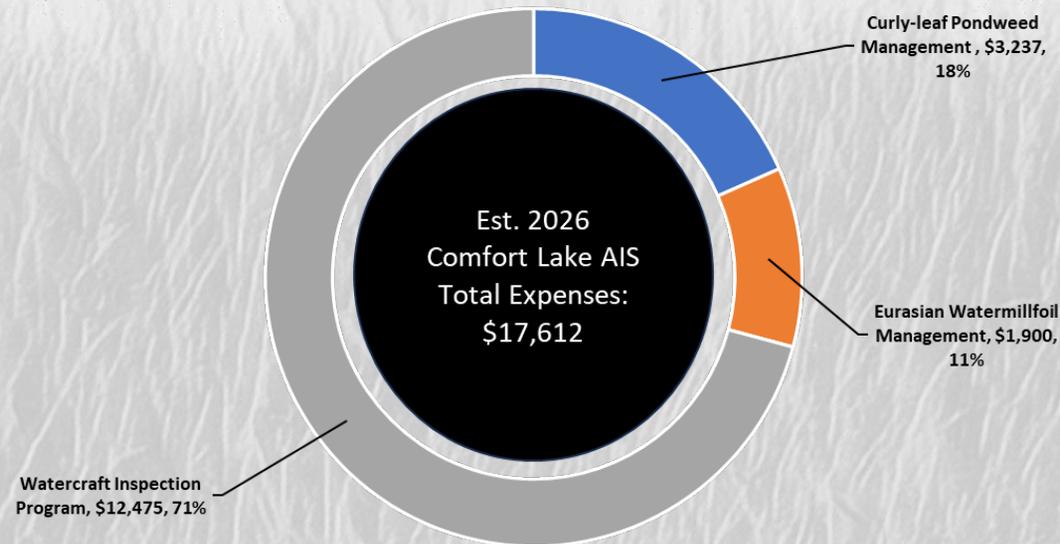


# Comfort Lake - 2025 Budget Summary

## CLFLWD's 2026 Comfort Lake AIS Estimated Funding



## CLFLWD's 2026 Comfort Lake AIS Program Estimated Expenses



\*Estimated CLP expenses use historical AIS treatment average acreage from previous years that required treatment (5.23 acres)

# District Wide – Early Detection & Rapid Response

**District Staff will continue to develop and evaluate the Early Detection and Rapid Response plan with the purpose of increasing overall effectiveness and efficiency.**

- 1. Detection of AIS**
- 2. Investigating and Verifying Reports of Findings of Suspected AIS**
- 3. Communication to Partners and Public**
- 4. Assessment of Risk**
- 5. Population Assessment**
- 6. Make Action Recommendations**
- 7. Implement Response Actions**
- 8. Effectiveness Monitoring**

**Following whatever outcome of the project, communicate to partners, DNR, and the public the results and future management plans.**



CLFLWD Seasonal WCI Staff at Bone Lake Public Launch

# District Wide - Purple Loosestrife

## Purple Loosestrife

- District staff performed several Purple loosestrife assessment surveys in 2025 with the purpose of implementing a future loosestrife beetle biocontrol management following DNR guidelines.
- Three sites with suitable conditions have been identified with large stands for sustaining beetle populations and easy access locations

### **Forest Lake Public Launch 3**

**Keewahtin** (Northern bay along Highway 97)

**Shallow Pond** (adjacent to Hawk Meadow Park trail system)

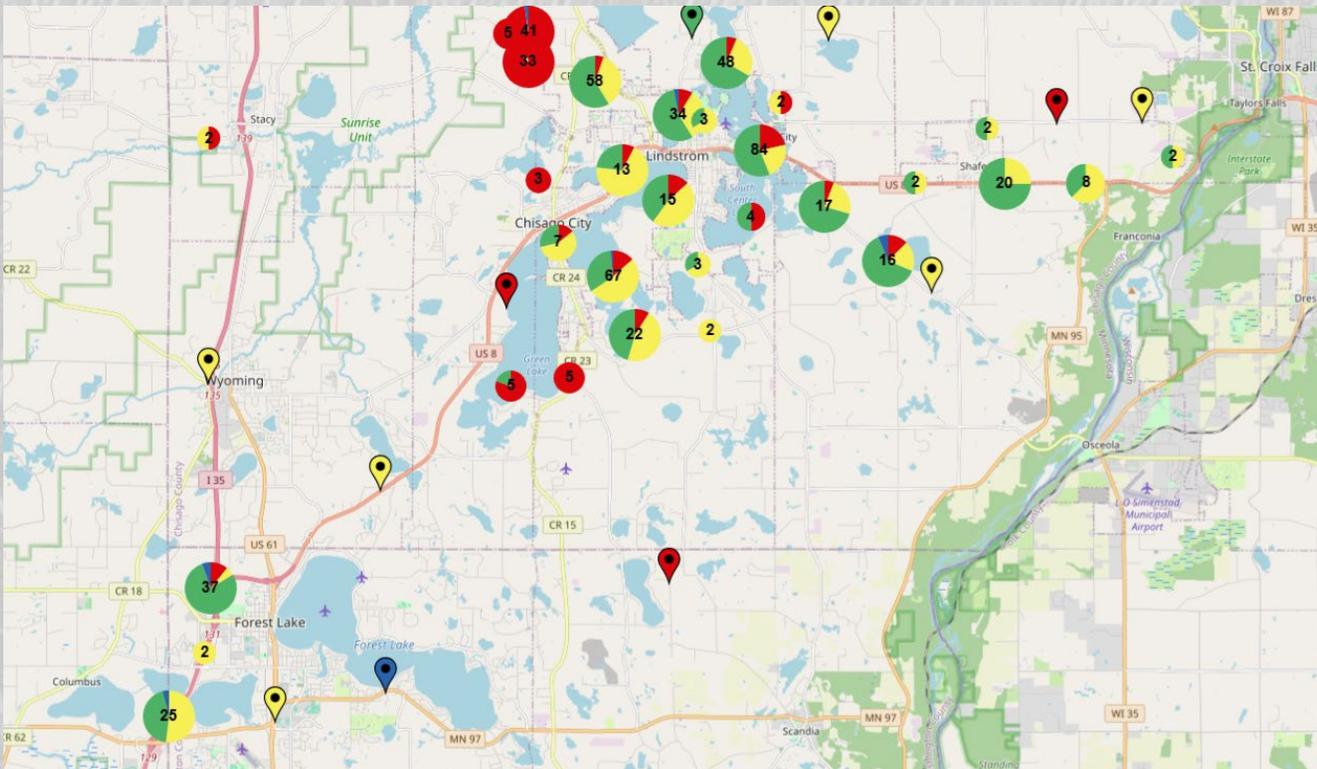
**Biocontrol Management:** In 2026 District staff will implement PL biocontrol management efforts following DNR beetle rearing and releasing guidelines. Additionally, staff will create a guidance document and potential outreach plan with the purpose of assessing the feasibility of expanding this into a citizen volunteer program in the 2027.



# District Wide - Phragmites

## Nonnative Phragmites

- District staff will continue to confirm and identify potential native & nonnative phragmites populations while out in the field.
- All nonnative phragmites stands have been reported on the EDDmaps application that the DNR & MAISRC use for determining potential future treatment locations.



Screenshot from EDDmaps web application indicating nonnative phragmites populations are present and in high numbers within proximity to the District.