



MEMORANDUM

Comfort Lake-Forest Lake Watershed District

Date: May 7, 2026
To: CLFLWD Board of Managers
From: Mike Kinney, District Administrator
Subject: Floodplain Resilience Action Plan



District Wide

Background/Discussion:

The purpose of this agenda item is to review the Floodplain Resilience planning process that the District has undergone over the last few years.

The last time this topic was on a board meeting agenda was [July 10, 2025](#). Since that time, staff have communicated with local municipalities to solicit feedback on the draft Floodplain Resilience Action Plan. Most of the proposed projects are located on city-owned land and require partnership with the local municipality. Drainage from the City of Forest Lake impacts downstream residents in the City of Wyoming and Chisago County. As such, City feedback and partnership are important elements of plan development.

As we know, the State of MN created the MN Watershed Law (S.S.103D) in 1955 to address situations similar to what is being observed here. Cities, Towns and Counties are artificial boundaries that are typically not aligned with watershed boundaries. As such, this law was adopted to address one LGU from artificially increasing runoff onto the next one downstream.

Recent Steps in the Planning Process

- The District shared the draft plan, as well as the adopted Strategic Plan, with partners and Technical Advisory Committee members in July 2025.
- The District further discussed the draft plan and solicited feedback from the two municipalities that overlap with the highest risk flood zones – Forest Lake and Wyoming.
- The City of Wyoming generally indicated support for projects and partnering on climate resiliency work.
- Staff and Emmons & Olivier Resources (EOR) met with City of Forest Lake staff multiple times over the last several months to discuss the plan and prioritize potential projects.
- The City of Forest Lake sent a comment letter to the District on January 27, 2026. The letter requested that the District specifically respond to four comments/questions.
- Staff have provided initial responses and proposed plan redlines to City staff for review.
- The Forest Lake City Council discussed this topic at the April 13th council meeting.
- City staff is currently reviewing the latest round of redlines to the draft Floodplain Resilience Action Plan Framework.



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Note that the Action Plan includes a list of potential mitigation actions which are dependent on a variety of outside factors. The District cannot guarantee completion of every action.

Managers are encouraged to watch the pre-recorded presentation in the May 14th board packet as a refresher on this topic.

Staff will distribute the proposed revised Action Plan Framework after we hear back from the City. At that point, staff will recommend the Board accept the revised Floodplain Resilience Action Plan Framework. From there, staff and EOR will bring a scope of work for project development to the following board meeting; **this work will be funded by the Water Quality & Storage Grant** that the District was recently awarded.

Attached

- City of Forest Lake Comment Letter
- Draft Response Letter
- Floodplain Resilience Action Plan Presentation Slides

MEMORANDUM

Date: 1/15/2025

To: Comfort Lake Forest Lake Watershed

From: City of Forest Lake

Subject: Comfort Lake Forest Lake Resiliency Study

The City of Forest Lake has reviewed the CLFLWD Flood Resiliency Study. We are interested in discussing potential projects at some of the sites identified in the study for flood control but other sites under the assumption that stormwater quality credits can be incorporated into the design. These credits would be applied to future linear projects and/or downtown redevelopment to satisfy stormwater requirements for those projects.

| CLFLWD Site Number | Considerations |
|--------------------|--|
| Site 2 | If project development could provide treatment credit for upstream facilities (i.e., 3 rd Ave SW, 12 th St SW) or would result in the City taking ownership, we would like to discuss this project in more depth. At this time the City does not support a floodplain project in this location until this area can be further reviewed on how it will benefit planned street reconstruction projects. |
| Site 3 and 4 | These sites are adjacent to areas of planned street reconstruction. We are interested in partnering on improvements that provide excess flood mitigation at these locations on the condition that regulatory credits (rate control, water quality, and volume control) can be incorporated into the improvements for future linear projects and/or downtown development or otherwise the City will need these locations to meet permit requirements at time of street reconstruction projects. |
| Site 5, 6, and 7 | Flood mitigation at these sites would have conflicts with existing municipal facilities. Space in these areas must be reserved to meet future regulatory requirements rather than above and beyond flood control/water quality project. |
| Site 8 | This site is located on MnDOT ROW, and MnDOT has proposed a BMP in this location as part of the Highway 8 reconstruction project. We are in support of CLFLWD looking for ways to flood storage in this area with the project. |
| Site 9 & 10 | We are supportive of CFLWD further exploring these areas for flood storage and implementing future projects. |

The City is not supportive of projects at Sites 1, 11, and 12. These properties are all located within the metropolitan urban service area (MUSA) and development potential at these parcels is very high. Given the development potential and significant wetland and drainage considerations for these sites, the city does not support projects unless they are discussed in detail at the same time as development.

In addition to the sites listed above, the resiliency report identified three regulatory actions for potential adoption by the watershed district/partner cities.

I. District-wide Overlay Zone for Climate Resilience

Create Overlay Zones that would;

- A) Set a uniform freeboard requirement above the modeled 100-year flood footprint.
 - Adoption of the modeled floodplain as an overlay district would significantly expand the regulated flood footprint/impact property values. The city has already adopted a flood fringe (FF) overlay zone (§ 154.005 FLOOD FRINGE OVERLAY DISTRICT (FF), passed 7-12-2010), and does not intend to adopt floodplain mapping in excess of state or federal standards.
- B) Restrict new development inside mapped 100-year flood footprint, unless compensatory storage or conveyance is provided.
 - Adoption of the modeled floodplain as the regulatory floodplain would exceed FEMA and Rice Creek Watershed standards. CLFLWD already requires compensatory excavation for fill within the 100-year floodplain in Rule 7.3.1. The City does not intend to adopt floodplain mapping in excess of state/federal requirements given the potential consequences to future development/redevelopment within the City.
- C) Offer incentives for projects that include green-infrastructure practices.
 - We would be supported of CLFLWD to create incentives for projects that include green infrastructure practices but would not support any projects to be planned or constructed in public ROW or drainage and utility easements without close coordination with the City. We do not want to push future street/utility projects towards condemnation of private property to meet regulatory requirements.

II. Coordination with Municipal Capital-Improvement Plan

- We are supportive of coordinating future capital improvements with increasing flood resiliency and capacity for regulatory stormwater quality credits.

III. Align Emergency-Routing Protocols and Flood-Risk Mapping

- The city is interested in partnering to implement projects that will reduce flooding/flood risk and leveraging flood modeling to develop robust emergency planning.

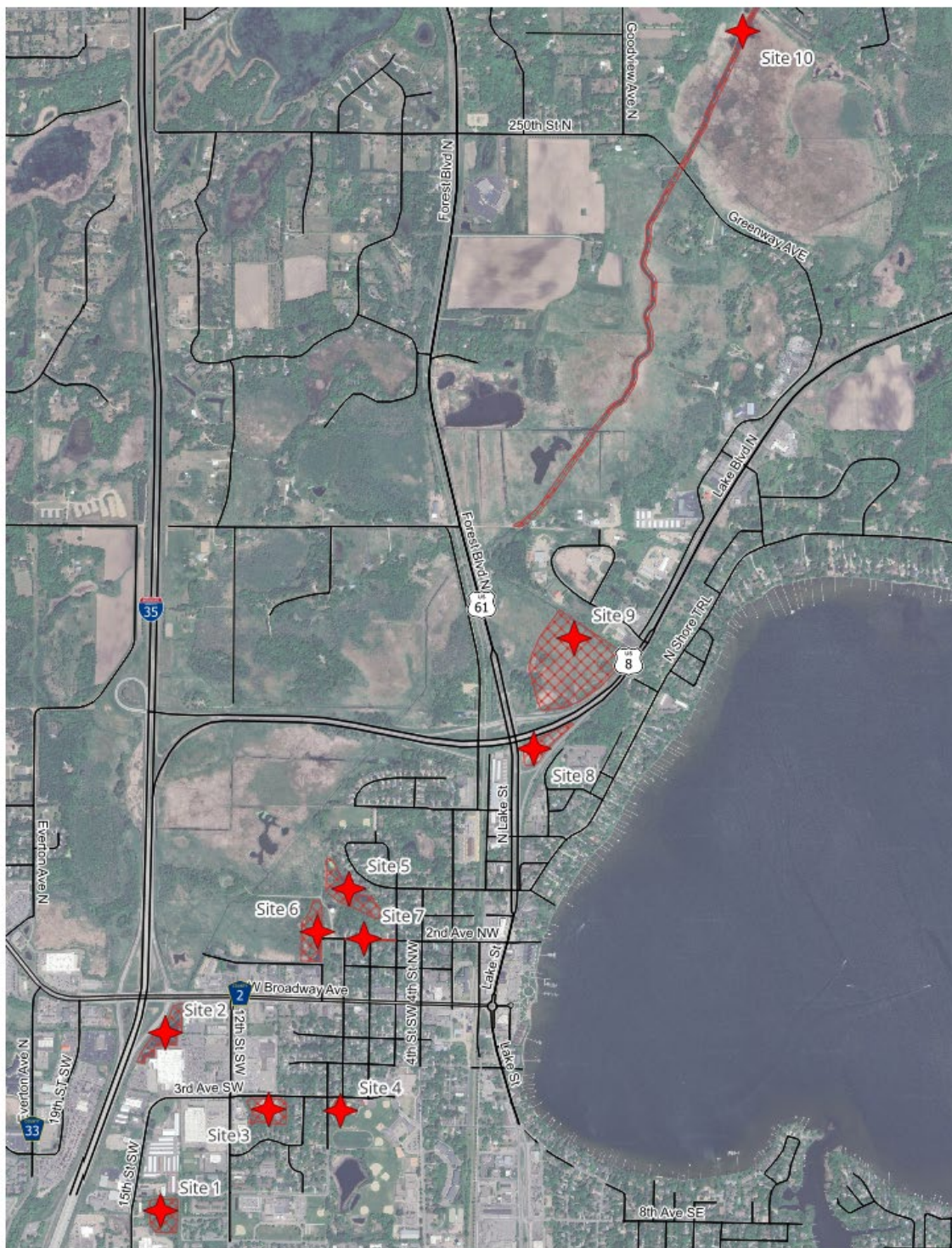
Name: Comfort Lake Forest Lake Resiliency Study



Date: 1/13/2025

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As a follow-up to our comments, we have the following questions we would like the watershed to provide responses to;

1. We respectfully request CLFLWD not pursue a LOMR through FEMA based on the most recent modeling completed at this time.
2. We also request CLFLWD not adopt a new modeled floodplain as an overlay district that is more restrictive than what the City has already adopted to meet state and federal standards.
3. What timeline does CLFLWD expect for pursuing the projects identified in the resiliency plan?
4. What funding mechanisms does the district intend to pursue, and will these sources preclude regulatory treatment credits?

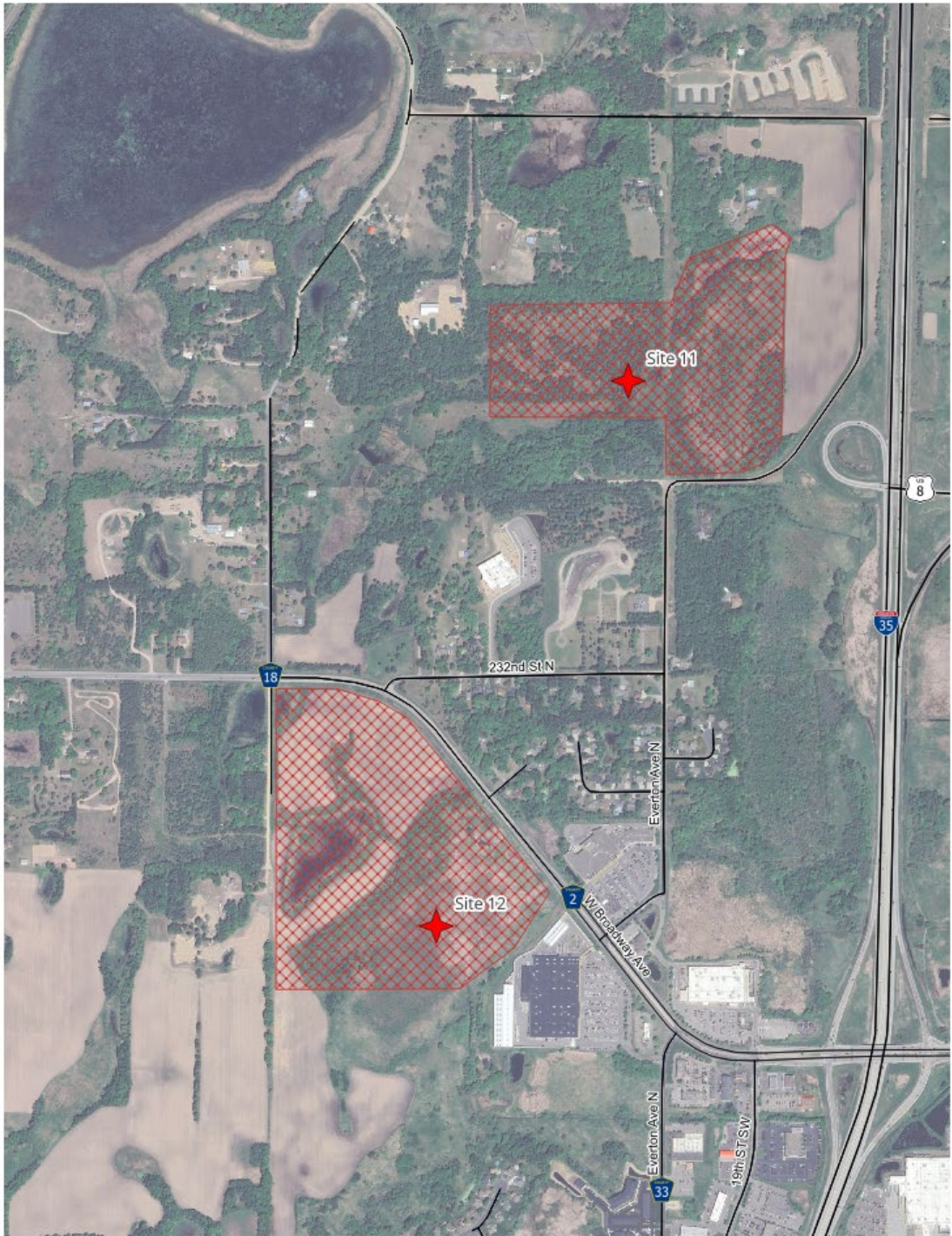


-  Conceptual Mitigation Actions Site
-  Conceptual Mitigation Actions Extent

CLFLWD
Conceptual Mitigation Actions Locations



Figure 15. Conceptual Mitigation Actions Location Map



-  Conceptual Mitigation Actions Site
-  Conceptual Mitigation Actions Extent

CLFLWD
Conceptual Mitigation Actions Locations

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0 800 1,600 ft

Figure 17. Conceptual Mitigation Actions Location Map - Wetland-Restoration Opportunities



MEMORANDUM
Comfort Lake-Forest Lake Watershed District

Date: April 23, 2026
To: City of Forest Lake Staff
From: Comfort Lake-Forest Lake Watershed District
Subject: Floodplain Resilience Action Plan Comments and Responses



The City of Forest Lake shared comments and questions regarding the CLFLWD’s draft Floodplain Resilience Action Plan on January 27, 2026. The City requested responses to the four comments below, and City staff requested the District share draft responses prior to finalizing with the Board of Managers. The purpose of this memo is to provide responses to the questions and comments posed by the City, per feedback from the CLFLWD Board of Managers.

| # | City Question/Comment | CLFLWD Draft Response |
|---|---|--|
| 1 | We respectfully request CLFLWD not pursue a LOMR [Letter of Map Revision] through FEMA based on the most recent modeling completed at this time. | The proposed Floodplain Resilience Action Plan did not include pursuing a LOMR, and it is not the District’s recommendation to pursue one at the time. |
| 2 | We also request CLFLWD not adopt a new modeled floodplain as an overlay district that is more restrictive than what the City has already adopted to meet state and federal standards. | While the draft Floodplain Resilience Action Plan included this as a recommended resiliency strategy (see page 34, items 4.4(l)(a) and 4.4(l)(b)), the CLFLWD is considerate of City feedback on this item. The District has revised this item to reflect the City’s request. The District’s new modeled floodplain may still be utilized as guidance when considering new development and re-development activities. Additionally, proposed implementation strategies may be further explored when updated guidance from NOAA (Atlas 15) is available. |



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|---|---|--|
| 3 | What timeline does CLFLWD expect for pursuing the projects identified in the resiliency plan? | Construction for projects identified within the study is not expected until 2028 or later. The CLFLWD will rely heavily on grant funding, and co-beneficial community partnerships to develop and implement projects. The CLFLWD has been awarded a Board of Water and Soil Resources Water Quality & Storage Grant to fund project modeling and further identify concept designs and opportunities. Additional planning work may begin as early as May 2026 under this planning grant. |
| 4 | What funding mechanisms does the district intend to pursue, and will these sources preclude regulatory treatment credits? | <p>There is a wide variety of funding sources available for flood mitigation projects such as MPCA’s “Implementation Grants for Stormwater Resilience” and DNR’s “Flood Hazard Mitigation Grants.” Most grants would preclude regulatory treatment credits.</p> <p>However, there is one grant program that <i>may</i> potentially fund stormwater credit projects if multiple benefits can be achieved; namely, achieving a wasteload allocation under a Total Maximum Daily Load (TMDL) study. The MN Public Facilities Authority (PFA) offers Point Source Implementation Grants (PSIG) providing 80% grant funding for large-scale, MS4 city-owned, stormwater projects that achieve TMDL wasteload allocations. The District and City would need to work with PFA to determine eligibility of a specific project.</p> |