

Memorandum

To: Commissioners, Bassett Creek Watershed Management Commission
From: Karen Chandler, Greg Williams (Barr), and Laura Jester, BCWMC Administrator
Subject: 2025 Watershed Management Plan Gaps Analysis version 1
Date: May 26, 2022

This document, referred to as the Gaps Analysis, includes a list of issues and/or topic areas and subsequent discussion of those areas as they relate to the existing 2015 Bassett Creek Watershed Management Commission (BCWMC) Watershed Management Plan (2015 Plan). The Gaps Analysis intends to guide development of the new Plan by identifying new or evolving issues that may warrant updating the 2015 Plan based on new data, Commission priorities, or regulatory, political, or social environment.

1.0 Analysis of Gaps by Topic Area

This Gaps Analysis is generally organized according to the topic areas of the 2015 Plan. Topic areas within this document include:

- Water quality
- Water quantity and flooding
- Erosion and sedimentation
- Streams
- Wetlands, habitat, and shoreland areas
- Groundwater
- Education and outreach
- Administration

While issues addressed in this document are categorized into one of the preceding sections, many of the issues have implications for other topic areas.

1.1 Water Quality

Section 3.1 of the 2015 Plan discusses water quality issues in the Bassett Creek watershed, including water quality performance standards, impaired waters and total maximum daily load (TMDL) studies, pollutant (primarily nutrient) loading, and water quality monitoring.

Topic/Current Status	Identified Gap	Possible Opportunity
<p><u>Water quality performance standards</u></p> <p>The BCWMC’s water quality performance standards are based on the MPCA’s Minimal Impact Design Standards (MIDS). For projects >1 acre, the BCWMC generally requires capture and retainage of 1.1 inches of runoff from new or redeveloped impervious surface sites without restrictions. For linear projects, the standard applies for projects that create 1 or more acres of new impervious surface regardless of the area of redeveloped impervious surface.</p>	<p>The BCWMC’s water quality volume standard is not as stringent as the 2020 MS4 permit. The 2020 MS4 permit requires MS4s to enforce standards for volume control of linear projects (or demonstrate what they try to do); the water control volume must be the greater of one inch over the new impervious area or 0.5 inch over the sum of the new and redeveloped impervious area. In some cases, this may result in a water quality control volume greater than that required by the BCWMC. Inconsistency between BCWMC requirements and MS4 requirements may lead to confusion when reviewing and permitting projects.</p> <p>The current BCWMC linear project standard allows potential water quality improvement opportunities to be missed during development and redevelopment activities.</p>	<p>The BCWMC may consider revising its water quality performance standard for linear projects to match the standard included in the 2020 MS4 general permit. The BCWMC may consider a tiered approach to linear requirements so as to capture more water quality improvement opportunities.</p>
<p><u>Impaired waters and TMDL progress</u></p> <p>Relative to the 2015 Plan, the 2022 MPCA impaired waters list includes no new impairments within the BCWMC. Since the 2015 Plan, Wirth Lake has been delisted for its nutrient impairment. The recent approval of the Lake Pepin/ Mississippi River nutrient TMDL includes new wasteload allocations applicable to metro MS4s.</p>	<p>The BCWMC and its member cities have performed several projects to address existing impaired waters that should be described in the Plan.</p> <p>The Plan does not address the most recent wasteload allocations for MS4s tributary to the Mississippi River and Lake Pepin.</p> <p>New impairments and/or de-listings (e.g., Sweeney Lake) may occur during Plan development, including anticipated stream and lake listings.</p>	<p>The Plan should be updated to reflect current progress towards existing TMDLs and updated to address any new impairments that arise during Plan development.</p>

Topic/Current Status	Identified Gap	Possible Opportunity
<p><u>Infiltration guidance</u></p> <p>The 2015 Plan included performance standards to emphasize infiltration as the preferred and primary mechanism to treat stormwater runoff.</p> <p>Since the development of the 2015 Plan, the MPCA’s NPDES Construction Stormwater General Permit and MS4 General Permit have been revised. The revised permits include reference to an MPCA screening checklist to determine site suitability for infiltration practices.</p>	<p>While infiltration is still the preferred strategy to treat stormwater runoff in many locations, portions of the Plan text may refer to outdated infiltration guidance. The flowchart from the <i>Requirements for Development and Redevelopment Proposals</i> document (Requirements document) does not reference the MPCA screening checklist.</p>	<p>The Plan should be updated to reference current guidance regarding infiltration site restrictions and/or explicitly describe those site restrictions in the Plan. The BCWMC may also consider concurrent updates to the Requirements document.</p>
<p><u>Chloride loading</u></p> <p>Chloride loading was an emerging issue at the time of 2015 Plan development. It is briefly described in the Plan issues section. Policies included in the 2015 Plan are limited to encouraging cities to limit chloride loading to waters and cooperate with partners to implement the then-future Twin Cities Metro Area Chloride TMDL. Since the 2015 Plan, the Twin Cities Metro Area Chloride TMDL and implementation plan have been completed.</p>	<p>The 2015 Plan does not fully characterize chloride loading issues within the watershed.</p>	<p>The 2025 Plan should utilize recent land use analysis and P8 modeling to illustrate and prioritize chloride hot spots.</p> <p>The BCWMC may consider adopting a goal (and supporting policies) specifically related to chloride issues. The BCWMC could identify chloride management practices that are currently implemented, what gaps remain, and how the BCWMC can assist in filling those gaps. New BCWMC projects or programs could include targeted CIP projects to reduce chloride pollution or new requirements prioritized in watersheds of impaired waters</p>

Topic/Current Status	Identified Gap	Possible Opportunity
<p><u>Water quality modeling</u></p> <p>Since the 2015 Plan was adopted, the BCWMC has developed and updated a watershed-wide P8 model.</p>	<p>Watershed-wide pollutant loading estimates were not available or included in the 2015 Plan.</p> <p>Comprehensive pollutant loading estimates (in combination with other data) provide a quantitative means to prioritize areas or subwatersheds for program or project implementation.</p>	<p>The BCWMC may establish priority areas (i.e., hot spots) for implementation based on high pollutant loading and/or low existing treatment.</p>
<p><u>BCWMC priority waterbodies</u></p> <p>The development of the 2015 Plan included the identification of Level 1 and Level 2 priority waterbodies based on a number of factors including: public access, size, intercommunity watershed, impairments, and others.</p>	<p>The existing priority waterbody classification may not reflect current BCWMC and/or member city priorities.</p> <p>The existing waterbody classification does not consider water quality trends/data observed since 2015.</p>	<p>The BCWMC may review the waterbody classification data (Appendix C of the 2015 Plan), updated to reflect more recent water quality, and affirm or revise the list of BCWMC priority waterbodies.</p>

1.2 Flooding and Rate Control

Section 3.2 of the 2015 Plan addresses water quantity and flooding issues. Specific issues discussed include risk to public health, infrastructure, and natural resources from flooding, floodplain management, Medicine Lake water levels, and maintenance of the BCMWC Flood Control Project.

Current Status	Identified Gap	Possible Opportunity
<p><u>Climate change and precipitation trends</u></p> <p>The 2015 Plan includes discussion of Atlas 14 precipitation data, published in 2013. Recent studies suggest continuing increasing trends in precipitation volume and intensity. The 2011-2020 period was the wettest decade in Minnesota in recorded history.</p> <p>Public awareness of climate change and political interest in addressing climate change have increased relative to the 2015 Plan.</p>	<p>The 2015 Plan does not address include policies related to climate change, precipitation trends, or climate resiliency (e.g., performance of BCWMC projects under future climate conditions).</p>	<p>The BCWMC may consider its role relative to increased precipitation trends as well as broader climate change. Specific issues to consider may include, but are not limited to:</p> <ul style="list-style-type: none"> - Sustainability and/or carbon footprint of BCWMC projects - Designing for larger storm events - Assessing flood risk of larger storm events - Impacts of increasing precipitation on the Bassett Creek Flood Control Project
<p><u>Hydrologic and hydraulic modeling and mapping</u></p> <p>Since adoption of the 2015 Plan, the BCWMC has developed and updated a watershed-wide XP-SWMM hydrologic and hydraulic model (including inundation mapping for the 100-year event).</p>	<p>Watershed-wide inundation mapping in the 2015 Plan is limited to FEMA-mapped areas. Updated watershed-wide modeling is available and may be used to prioritize areas of increased flood risk for BCWMC projects.</p> <p>The watershed-wide model may need to be updated to estimate impacts of future precipitation trends on city and/or BCWMC infrastructure.</p>	<p>The BCWMC may establish priority areas for flood risk reduction projects based on model results.</p> <p>The BCWMC may update the watershed-wide model (beyond the regular updates made to incorporate new/re-development) to inform policies, projects, and projects related to climate change and precipitation trends.</p>

Current Status	Identified Gap	Possible Opportunity
<p><u>Grant funding for flood risk reduction</u></p> <p>Since adoption of the 2015 Plan, BWSR has provided non-competitive watershed-based implementation funding (WBIF) for projects to address water quality issues. WBIF funding cannot be used for projects primarily to address flood risk reduction. Some member cities have successfully obtained Minnesota Department of Natural Resources Flood Reduction Grants to offset the cost of BWCMC CIP projects addressing flood risk.</p>	<p>New funding tools may not be available to address flood risk reduction as a primary benefit. Projects that incorporate water quality improvements alongside flood risk reduction may provide an opportunity for multiple benefits to be achieved through WBIF.</p>	<p>The BCWMC may consider revising the project prioritization framework to further promote projects that incorporate both water quality and water quantity benefits.</p>

1.3 Erosion and Sediment Control

Section 3.3 of the 2015 Plan addresses erosion and sedimentation issues. Specific issues discussed include requirements for MS4s to implement erosion and sediment controls and sediment deltas downstream of stormwater outfalls identified by stakeholders during 2015 Plan development.

Current Status	Identified Gap	Possible Opportunity
<p><u>NPDES Construction Stormwater Permit</u></p> <p>The Plan references the 2013 NPDES Construction Stormwater Permit. The permit was updated in 2018.</p>	<p>The references to the MPCA’s 2013 NPDES Construction Stormwater Permit in the 2015 BCWMC Plan are out of date. The updates to the permit do not substantially impact the references in the BCWMC Plan.</p>	<p>The BCWMC must revise impacted sections of the Plan to reference the current Construction Stormwater Permit.</p>

Current Status	Identified Gap	Possible Opportunity
<p><u>Sediment deltas</u></p> <p>Accumulation of sediment deltas downstream of pipe outfalls was identified as an issue during 2015 Plan development. The 2015 Plan includes a policy to potentially fund sediment removal in intercommunity waterbodies.</p>	<p>Existing policy may not be sufficient to determine roles and responsibilities related to addressing sediment deltas in BCWMC lakes or streams. The 2015 Plan lacks an implementation component to address this issue.</p>	<p>The BCWMC may consider consulting the City TAC to determine the extent and severity of this issue. If determined to be significant, the BCWMC may consider addressing it with a program or project(s) within the Plan implementation schedule.</p>

1.4 Stream Management

Section 3.4 of the 2015 Plan addresses stream management issues. Specific issues discussed include altered stream hydrology, ravine and streambank degradation, and stream restoration (including project prioritization methods and use of natural materials).

Current Status	Identified Gap	Possible Opportunity
<p><u>Stream health assessments</u></p> <p>Following adoption of the 2015 Plan, the BCWMC began monitoring flow and water chemistry on Bassett Creek tributaries. This data is in addition to the ongoing watershed outlet monitoring program (WOMP) and BCWMC stream biotic monitoring. Biotic impairments of BCWMC streams are anticipated with the 2024 impaired waters list.</p>	<p>Bassett Creek tributary water chemistry data was not available during 2015 Plan development. Stream health in the BCWMC has not been comprehensively assessed. Existing stream health tools may not be appropriate for urbanized streams like those in the BCWMC.</p>	<p>Plan development is an opportunity to develop a more complete assessment of BCWMC stream health and to better understand stream impairments, applicable stressors, and the impact of current or future protection or restoration strategies.</p>

1.5 Wetlands, Habitat and Shoreland

Section 3.5 of the 2015 Plan summarizes issues related to wetlands, habitat and shoreland areas. Specific issues discussed include wetland buffer widths, aquatic invasive species (AIS) management, and member city wetland classification and management. During 2015 Plan development, residents ranked wildlife habitat and AIS as high priorities.

Current Status	Identified Gap	Possible Opportunity
<p><u>Wetland priority areas</u></p> <p>The 2015 Plan includes discussion of the National Wetland Inventory (NWI) and corresponding figure. The 2015 Plan also notes that member city wetland inventories exist but vary in their extent.</p>	<p>The 2015 update to Minnesota Rules 8410 requires that the Plan include priority areas for wetland preservation, enhancement restoration, and establishment. The 2015 Plan does not include such a prioritization.</p>	<p>The 2025 Plan should include the determination of priority areas for wetland management to be consistent with MN Rules 8410.0060.</p>
<p><u>Buffer standard implementation</u></p> <p>The 2015 Plan and subsequent revisions to the Requirements document included increased minimum buffer width performance standards. Member cities must include buffer widths in their local controls (e.g., ordinances).</p>	<p>Since adoption of the 2015 Plan, the BCWMC has not comprehensively reviewed the implementation of wetland buffer width standards to assess its impact on resource protection or development or redevelopment opportunities (i.e., are higher standards limiting projects)</p>	<p>The planning process is an opportunity for the BCWMC to review buffer width implementation by member cities to determine if any changes to performance standards or implementation are warranted.</p>
<p><u>AIS management</u></p> <p>Since adoption of the 2015 Plan, the BCWMC developed the <i>BCWMC AIS Rapid Response Plan</i>. That plan includes specific roles for cities, the BCWMC, and partner agencies related to AIS management in BCWMC Level 1 priority waterbodies.</p>	<p>The policies in the 2015 Plan related to AIS do not reflect the specific roles and responsibilities detailed in the <i>BCWMC AIS Rapid Response Plan</i>.</p> <p>The inventory of AIS present in the BCWMC in the 2015 Plan is not current and should be updated (e.g., to include zebra mussels and starry stonewort).</p>	<p>The planning process is an opportunity for the BCWMC to reflect on the implementation of the <i>BCWMC AIS Rapid Response Plan</i>, revise the AIS plan if needed, and update Plan policies to be consistent with the <i>BCWMC AIS Rapid Response Plan</i>, as revised.</p>

Current Status	Identified Gap	Possible Opportunity
<p><u>Shoreland habitat monitoring</u></p> <p>Policy 78 of the 2015 Plan states that the BCWMC will consider implementing a shoreline habitat monitoring program for Level 1 priority lakes.</p>	<p>Following a recommendation by the TAC in November 2016, the BCWMC chose not to implement the monitoring program referenced in policy 78 of the 2015 Plan.</p>	<p>The 2015 policy should be updated (or deleted) to reflect the BCWMC prior action or current intend. The planning process is an opportunity for the BCWMC to re-evaluate if additional habitat monitoring of BCWMC priority lakes is worthwhile and should be included in the ongoing monitoring program (or coordinated with member cities).</p>

1.6 Groundwater

Section 3.6 of the 2015 Plan summarizes issues related to groundwater management. Specific issues discussed include clarifying the BCWMC’s role in groundwater management, guidance for infiltration in vulnerable areas, and groundwater conservation.

Current Status	Identified Gap	Possible Opportunity
<p><u>Groundwater Management Roles</u></p> <p>Policy 47 in the 2015 Plan identifies potential BCWMC groundwater management roles in coordination with other partners, including:</p> <ul style="list-style-type: none"> - identify data gaps and attempt to fill those gaps through collection of groundwater level data and/or surface water flow data. - develop a groundwater budget for the watershed. - develop and utilize tools to assess surface water impacts and groundwater impacts of groundwater use 	<p>To date, the BCWMC has not collaborated with partners to perform the potential groundwater roles identified in policy 47.</p>	<p>The BCWMC may use the Plan update process to get input from planning partners regarding priority groundwater issues and appropriate roles for the BCWMC.</p>

1.7 Public Involvement and Education

Section 3.7 of the 2015 Plan discusses issues related to outreach and education. The 2015 Plan notes opportunities for increased education tracking metrics, collaborative relationships with Metro Blooms, West Metro Watershed Alliance, Hennepin County, and other partners, and identification of specific training for member city staff.

Current Status	Identified Gap	Possible Opportunity
<p><u>Diversity, equity, and inclusion (DEI)</u></p> <p>The 2015 Plan does not address diversity, equity, or inclusion in watershed management.</p> <p>The BCWMC has expressed interest in addressing DEI in the 2025 Plan. The BCWMC co-hosted an event in April 2022 to share information about DEI aspects of watershed management.</p>	<p>The BCWMC has identified DEI as a gap in the current Plan.</p> <p>There are opportunities to address DEI in the Plan, including:</p> <ul style="list-style-type: none"> - Goals - Policies - Implementation priorities - Outreach and partnerships <p><i>Note: while this item is included under "Outreach and Education" it affects many aspects of the Plan update and ongoing operations.</i></p>	<p>BCWMC staff and/or commissioners plan to meet with representatives from community groups to identify ways the BCWMC can address DEI in its operations, programs, and projects.</p> <p>The BCWMC may develop outreach strategies to increase engagement with under-represented groups and consider equity principals in setting priority areas for programs and projects.</p>
<p><u>Community Grants</u></p> <p>The BCWMC does not currently provide grant funds to individuals or groups to implement stormwater BMPs.</p>	<p>There is increasing public interest in water and natural resource stewardship. Many watershed management organizations (WMOs) implement grant programs to fund voluntary stormwater BMPs constructed on private property.</p>	<p>The BCWMC may consider developing (or partnering to support) a grant program to implement private-property stormwater BMPs.</p>

Current Status	Identified Gap	Possible Opportunity
<p><u>Education Program</u></p> <p>Appendix B of the 2015 Plan is an Education and Outreach Plan (EOP). That plan describes key audiences, methods for communication, topics and messages, and methods for evaluation.</p>	<p>BCWMC evaluation of education program may identify areas for effective outreach. The topics emphasized in the EOP may not reflect priority issues identified in this Plan update. The EOP does not address issues or strategies related to DEI.</p> <p>A key recommendation in the 2021 Watershed Performance Review and Assistance Program (PRAP) Report developed by BWSR includes “Prioritize developing an education and outreach strategy for BCWMC constituents.” The PRAP noted that BCWMC education programs are limited by staff capacity and funding.</p>	<p>The BCWMC may update the EOP concurrent with the Plan update to reflect the priorities of the Plan and specifically address DEI gaps.</p> <p>The BCWMC should explore opportunities to expand its education programs through additional funding, additional staff, collaboration with Hennepin County, or expanded partnership with the West Metro Water Alliance.</p>

1.8 Administration and Implementation

Section 3.8 of the 2015 Plan describes issues and opportunities related to the BCWMC’s responsibilities and implementation. Issues identified in the 2015 Plan include lack of quantifiable goals, opportunities to clarify maintenance roles, evaluation of member city implementation, and updates to Minnesota watershed law.

Current Status	Identified Gap	Possible Opportunity
<p><u>Measurable goals</u></p> <p>Since development of the 2015 Plan, the Board of Water and Soil Resources (BWSR) revised Minnesota Rules 8410 and placed additional emphasis on the measurability of goals. Most of the goals in the 2015 Plan are qualitative.</p>	<p>Existing BCWMC goals included in the 2015 Plan are not sufficiently measurable or quantifiable.</p>	<p>BCWMC Plan goals must be updated to provide additional measurability to receive BWSR approval. This is also reflected as a recommendation in the 2021 PRAP by BWSR to “develop clear, measurable goals and actions for future plan implementation.”</p>

Current Status	Identified Gap	Possible Opportunity
<p><u>Performance standards documentation</u></p> <p>The 2015 Plan includes several performance standards related to water quality volumes, minimum building elevations, vegetated buffers, and stormwater rate control. These are included in the 2015 Plan policies.</p> <p>These performance standards are also included in the BCWMC's <i>Requirements for Development and Redevelopment Proposals</i> document (Requirements document).</p>	<p>BCWMC performance standards are documented in two different sources. The Requirements document has been revised several times since adoption of the 2015 Plan. Including performance standards in two documents may result in future inconsistencies.</p>	<p>The BCWMC may consider omitting performance standards from the policies included in the Plan. Instead, the Requirements document may be used as the sole source of performance standards. The Requirements document may be referenced within, and appended to, the Plan.</p>
<p><u>Progress assessment</u></p> <p>The revised Minnesota Rules 8410 require the BCWMC to assess its progress towards measurable goals at least every two years. The BCWMC submits an annual report each year.</p>	<p>The 2015 Plan does not describe a process for assessing progress towards goals. Progress towards goals is not quantified in the BCWMC's annual report.</p>	<p>The Plan must include description of a process for assessing progress towards measurable goals. This may include a tracking table, summary sheets for select goals and/or waterbodies, or other methods.</p>
<p><u>Capital Improvement Planning</u></p> <p>Following adoption of the 2015 Plan, the BCWMC developed a project prioritization framework to score and rank potential CIP projects. New projects are often added with TAC recommendations.</p>	<p>The BCWMC CIP project prioritization framework is a tool to rank potential projects following their addition to the CIP. Some commissioners have expressed interest in a more "proactive" process that includes a more systematic identification of possible projects.</p>	<p>The planning process is the ideal time for the BCWMC to evaluate its CIP development, project scoring process, and program implementation to determine if changes are needed. This was also a recommendation in the 2021 PRAP by BWSR to "conduct a review of the BCWMC capital improvement program (CIP)."</p>

Current Status	Identified Gap	Possible Opportunity
<p><u>Watershed-based implementation funding (WBIF)</u></p> <p>It is likely that BWSR will continue to allocate non-competitive grant funding to be used in the Bassett Creek watershed via WBIF. The BCWMC collaborates with cities, Hennepin County, and others to allocate those funds.</p>	<p>WBIF is in its early stages and the process for its allocation has changed with each biennium. The 2015 Plan generally describes funding sources but does not address a cooperative grant source like WBIF.</p>	<p>The BCWMC may use the Plan update process to clarify its financial policies and/or program and project priorities as they relate to WBIF or similar sources of funding.</p>
<p><u>BCWMC Organizational Capacity</u></p> <p>The BCWMC does not maintain full time staff. The BCWMC contracts with a part time administrator and consultants to conduct its operations and implement the Plan.</p>	<p>The existing BCWMC organizational capacity may not be sufficient to carry out all tasks necessary to maintain the organization and implement the updated BCWMC Plan.</p>	<p>The BCWMC may use the Plan update process to evaluate whether increases in staff resources/capacity are necessary to implement the updated Plan.</p>
<p><u>Bassett Creek Valley Master Plan Implementation</u></p> <p>The City of Minneapolis seeks to implement portions of the Bassett Creek Valley Master Plan (BCVMP). The Plan identifies potential flood storage and water quality treatment opportunities.</p>	<p>Implementation of the BCVMP may provide potential opportunities to achieve shared City/BCWMC goals, including increased flood storage and water quality treatment. Potential project funding sources, roles, and responsibilities for implementing the BCVMP are not established.</p>	<p>The BCWMC may use Plan development as an opportunity to collaborate with Minneapolis to identify improvements to achieve shared goals move forward with the BCVMP.</p>

2.0 Addressing Significant Gaps

This memorandum summarizes a range of known gaps. Some of these gaps are the result of internal drivers (e.g., commissioner priorities) while others are functions of external drivers (e.g., agency requirements). The matrix below provides a qualitative comparison of 1) the relative effort or complexity to address each gap, and 2) the relative priority to address each gap. The priority and complexity of each gap assigned herein is preliminary, based on best professional judgement of BCWMC staff. The relative effort to address each gap will vary according to the “solution” pursued by the BCWMC (see Next Steps). Gaps related to Plan content requirements are identified as high priority and specifically noted.

		Priority to address		
		Low	Medium	High
Complexity / difficulty to address	High	<ul style="list-style-type: none"> Community grants 		<ul style="list-style-type: none"> DEI CIP process Chloride pollution H&H modeling and mapping Linear project requirements
	Medium	<ul style="list-style-type: none"> WBIF policies Grant funding for flood risk reduction Sediment deltas 	<ul style="list-style-type: none"> AIS management Buffer standard implementation Impaired waters and TMDL progress Organizational capacity Stream health assessment Bassett Creek Valley Plan 	<ul style="list-style-type: none"> Goal measurability* Progress assessment* Water quality performance standards (non-linear) Climate change and precipitation trends Education program
	Low	<ul style="list-style-type: none"> Performance standards documentation Groundwater management roles Shoreline habitat monitoring NPDES construction stormwater permit 	<ul style="list-style-type: none"> Infiltration guidance 	<ul style="list-style-type: none"> Wetland priority areas*

* Plan content requirement per Minnesota Rules 8410

3.0 Next Steps

This memorandum summarizes known and anticipated gaps the Commission may choose to address as part of the Plan update process (and some gaps that must be addressed to address Plan requirements). This version of the memorandum was developed prior to the results of other planned stakeholder engagement activities including:

- Responses to the Plan notification letter
- Responses to the City staff questionnaire
- Resident survey responses
- Meetings with community groups

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The gaps presented in this memorandum are intended to serve as input to commissioner discussion of priority issues at a workshop tentatively scheduled for July 2022. Following that discussion, BCWMC staff will develop a more detailed scope and schedule to address those gaps/challenges identified as high priority.

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