

RECOMMENDATIONS SECTION COMMENTS BEGIN HERE

CMAP Staff Response as of 4/20/09

GENERAL COMMENTS ON ALL RECOMMENDATIONS

Our interpretation of the executive order is that the RWSPG is charged with studying, planning, and making recommendations based on its understanding of its region – not for making state-wide recommendations that could potentially affect other regions which it has not studied or become familiar with. Given this lack of study, the RWSPG is not in a position to specify policy to other areas of the state. **Thus, we request that all “State” recommendations be removed.**

The NE IL RWSPG is in a position to make recommendations to the State as the latter is charged with “defining a comprehensive program for state and regional water supply planning and management and develop a strategic plan for its implementation ...” The State is not likely to create such a program in a vacuum, but rather as an outcome of lessons learned and needs identified in the two pilot planning processes. Where there is broad support for particular recommendations, such might advance while other less attractive recommendations may not. If it is the consensus of the RWSPG to remain silent on a potential State role in an integrated framework for achieving greater conservation, for example, then the “State” recommendations can be removed. There have been no other similar requests, however, to remove recommendations for the State.

Specific to our region, information reviewed during the course of participation in the RWSPG supports that the water supply problems faced by the region are of a localized nature and that some time is available to address them. As such, we encourage the entire RWSPG to keep this fact in mind when considering costly or bureaucratic measures throughout the region. We would suggest that all recommendations be structured as recommendations, rather than requirements, emphasizing the statement currently on the bottom of page 34, and referred to above: “The most successful water conservation programs are implemented at the local utility level where an understanding of local needs and community character has typically been best developed.”

The above described concerns shape the comments detailed below:

Pg 31-32: Integrated Water Resources Planning

- Pg 31: The conclusion contained in the fourth full paragraph on this page: “...it is difficult to see how IRP can be rigorously applied beyond the municipal utility level in our region absent the creation of a state, regional, or subregional planning authority.” is not supported by the text, nor has it been adopted by the RWSPG. We recommend that the basis for this conclusion be adequately explained. Then the issue should be raised before the RWSPG with regard to its adoption.

This topic has been restudied and revised to provide improved explanation. The idea of a new planning authority is no longer explicitly mentioned in the discussion.

- Pg 32: The items described as the “comprehensive or holistic approach” have not been formally adopted by the RWSPG for recommendations. Mention of these approaches should include a clarifying point indicating that the group discussed the issues, but that a formal endorsement was not adopted.

The language of this section has been modified to note lack of formal adoption of this approach.

- Pg 32: The RWSPG is not in a position to unilaterally determine that more planning take place. To our knowledge, no formal approval of such a planning effort has been made. If the RWSPG recommends that there be a subsequent planning effort, such a discussion would be better included among the other recommendations.

The NE IL RWSPG and EC IL RWSPC were formed for the specific task of, “participation in the development and approval of regional plans in the Priority Water Quantity Planning areas.” That task will be completed June 30, 2009. IDNR has made it clear that they intend to provide both CMAP and MAC with some level of funding in FY '10 for plan implementation and related activity. Since it is logical and very common for water supply planning to be iterative in nature, it seems appropriate to suggest another planning cycle particularly since many important issues did not receive attention during this first and relatively short planning cycle. CMAP will continue to include issues of water demand/supply in the regional comprehensive planning process as well.

Page 33-35: Conservation Coordinator

The statement: “The most successful water conservation programs are implemented at the local utility level where an understanding of local needs and community character has typically been best developed.” Should be moved to the introduction of the conservation measures to inform the reader of what is envisioned by the subsequent measures and recommendations.

Pg 35: Conservation Coordinator Recommendations

- Delete “State” level recommendation. Benefit is achieved at the local level, not State. We do not need to create an expensive bureaucracy to achieve conservation measures.

This was addressed above.

- Refrain from designating a lead agency for the regional program (at this point CMAP) until such time as it can be determined where the greatest technical expertise lies and which agency is best suited for this task.

CMAP is the regional planning agency and was selected by IDNR to lead and facilitate the regional water supply planning process.

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Pg 36: Water Survey Program Recommendations

- Delete State level recommendation – this should be a local decision based on needs.

This was addressed above.

- Refrain from designating a lead agency for the regional program (at this point CMAP) until such time as it can be determined where the greatest technical expertise lies and which agency is best suited for this task.

This was addressed above.

- This should be a local voluntary program offering incentives to participate, with options to make it mandatory on a sub-regional basis if circumstances warrant.

This comment is unclear. All conservation measures include RECOMMENDATIONS for implementation. By definition this is a 'local' program.

Pg 37-38: Residential Plumbing Retrofit Recommendations

- The recommendations are not clear. What is meant by “require retrofit on resale”? Is it the consensus opinion of the RWSPG to endorse a program to prohibit sales of homes based on their appliances?

“Require” has been replaced with “Recommend.” A “program to prohibit sales of homes” is not the intention.

- Delete the State level recommendation.

This was addressed above.

- Delete the County recommendation – this program would likely be *extremely* costly to implement, and should be a local decision.

“Require” has been replaced with “Recommend.” Thus, the issue of cost is moot.

- We suggest that if this recommendation is retained at all, it be reformulated as an incentive based approach (i.e. waive the recorder fees or transfer taxes), or as a public education/information campaign to encourage retrofits.

Thank you.

Pg 38: System Water Audit Recommendations

- Delete State level recommendation.

This was addressed above.

Pg 38-39: Metering with Commodity Rates for New Connections and Retrofit of Existing Connections

The suggestion that there be "...separate meters in industrial processes to delineate consumptive and nonconsumptive uses" requires clarification. Metering a non-consumptive use (i.e. water immediately returned to the source) adds nothing to our understanding of water use. Since water in = water out, the expense of metering is not justified.

The rationale behind the above statement is that water utilities sometimes provide sewer allowances for water used but not returned to sewer, e.g. once thru cooling, water lost to evaporation through cooling towers. This requires separate meters for lines to cooling towers and for other industrial processes that involve consumptive water uses.

Page 39: Metering Recommendations

- Delete the state level recommendation. This should be a local decision.
- This was addressed above.

Pg 40: Residential ULFT Program Recommendations

- Remove State recommendation – this should be a local decision.
- This was addressed above.
- Refrain from designating a lead agency for the regional program (at this point CMAP) until such time as it can be determined where the greatest technical expertise lies and which agency is best suited for this task.
- This was addressed above.

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Pg 41: HEW Program Recommendations

- Remove State recommendation – this is a local decision.
- This was addressed above.
- Refrain from designating a lead agency for the regional program (at this point CMAP) until such time as it can be determined where the greatest technical expertise lies and which agency is best suited for this task.
- This was addressed above.

Pg 42: Water Waste Prohibition Recommendations

- Remove State recommendation. This was addressed above.
- We have no rational basis to recommend state-wide adoption of the Lake Michigan service area requirements. The recommendation has been changed to "regionwide."

- A county or local decision to adopt reasonable measures commensurate with their local situation is a reasonable approach. Okay.
- Reference to single pass cooling should specifically reference comfort HVAC systems only, not process/production systems.

Why not?

Pg 43: Large Landscape Conservation Program Recommendations

- State recommendation should be removed in favor of local decision making. This was addressed above.
- The recommendation on the “exclusive” use of native plantings appears to be excessive.

We disagree. Furthermore, we believe the targets for this recommendation – county government, municipal/private utility – are best able to judge their ability/willingness to follow the recommendation.

Pg 43 Conservation Programs for Commercial, Industrial & Institutional Accounts

The paragraph starting with “financial and regulatory incentives...” talks about a “waiver of permit fees” and the granting of “Variances and waivers”. Please provide greater specification regarding what kinds of incentives and regulatory relief are envisioned.

“Permit fees” refers to whenever a commercial, industrial or institutional facility needs a permit to allow it to operate in a specific location (whether it is for plan review, building/construction permits or otherwise). Generally, there are fees associated with such permits and a governmental unit may consider a reduction or waiver of such fees if a facility demonstrates commitment to significant reduction in water use. The same can apply for granting a zoning variance. Faster processing times can also be part of the incentives.

Some cities/states, e.g. Portland/Oregon, offer grants and low-interest loans to businesses for the implementation of cost- and resource-saving programs. See <http://bestbusinesscenter.org/resources/financial-incentives/> for more details.

Pg 45 Commercial, Industrial & Institutional Conservation Program Recommendations

- As noted previously, we believe that all State recommendations be removed. Specific to State recommendation 1) requiring audits of every building every year is impractical, burdensome, not cost effective and as proposed compromises business trade secrets and confidentiality. Businesses that are not resource efficient will be driven out of business by their more efficient competitors; we do not need to create an expensive bureaucracy that will further increase already high business regulatory costs in Illinois.

This has been addressed above and, ‘require’ has been changed to ‘recommend’.

- Refrain from designating a lead agency for the regional program (at this point CMAP) until such time as it can be determined where the greatest technical expertise lies and which agency is best suited for this task.

This was addressed above.

Pg 47: Table x

This table, while a very good idea, requires a substantial amount of additional information in order for the reader to fully understand what it shows. Absent that information, meaningful comments cannot be offered. For example, the appendix containing the calculations is not included – have these calculations been done? – will they require lengthy explanation? What is meant by the Low Conservation and High Conservation columns? The footnotes do not adequately explain – please elaborate. What baseline-level of conservation, already in place, is being used to derive the potential additional savings? How is that determined?

Yes, calculations and explanations have been done and will appear in an appendix. Low and High Conservation columns will have an enhanced explanation in the text. The calculations are a result of staff research from a combination of sources and methods used for calculating BMP water savings. Research involved both the review of written material and correspondence with current water conservation program staff members from across the United States.

Pg 48: Tables x and x

The same general comments, as outlined above, apply.