



Mill Creek Water Reclamation District

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March 31, 2009

Ms. Dawn Thompson
Associate Planner
Staff Secretary to the Wastewater Committee
Chicago Metropolitan Agency for Planning
233 South Wacker Drive
Suite 800, Sears Tower
Chicago, Illinois 60606

Re: Grand Prairie Sanitary District
New Land Treatment System
CMAP Water Quality Review Number 09-WQ-005

Dear Ms. Thompson:

The Mill Creek Water Reclamation District ("MCWRD") objects to the Amendment Request of the Grand Prairie Sanitary District to install a new spray irrigation wastewater treatment facility to serve the Settlements of LaFox development (the "Subject Property"). The Subject Property is already within the MCWRD's Facility Planning Area and the MCWRD has spent a significant amount of time and resources in anticipation of serving the Subject Property. Please know the MCWRD remains interested in providing the necessary water and wastewater services to this property and can do so in an efficient and cost-effective manner.

From its inception, both by design, and by the actions of the MCWRD's Board of Trustees, the MCWRD has taken an environmentally friendly approach to wastewater treatment. The MCWRD's treatment of wastewater, through the utilization of extended aeration wastewater recycling and the reuse of the treated wastewater through land application, attempts to maintain and improve the quality of Kane County's water resources. We believe that the MCWRD's approach is consistent with the general goals and objectives of the Illinois Environmental Protection Agency, the comprehensive plan of Kane County and the general policies and objectives of the Chicago Metropolitan Agency for Planning ("CMAP").

The Settlements of LaFox developers initially approached the MCWRD about the possibility of annexing into the MCWRD in 2005. The MCWRD viewed this as a tremendous opportunity to expand its environmentally-friendly operations, to avoid the unnecessary proliferation of independent wastewater treatment facilities and to potentially reduce costs to its users by taking advantage of the economies of scale that the annexation would create. With support from Kane County, the MCWRD's Trustees made plans and took significant action to provide for and accommodate the Settlements of LaFox development.

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On March 20, 2007, the IEPA approved the expansion of the MCWRD Facility Planning Area (FPA) to include the Settlements of La Fox development. The expansion of the MCWRD Facility Planning Area was obtained pursuant to the request of the Settlements of LaFox developers. Fortunately, the MCWRD's systems were designed to facilitate expansion in order to serve properties outside of the MCWRD's initial boundaries. The expansion of the MCWRD's systems to serve the Subject Property was the logical course of action.

Over the past three years, the MCWRD has (i) prepared plans, drawings and specifications relating to the necessary infrastructure and improvements, (ii) obtained permits from the IEPA for construction and operation of improvements to its water supply system and its wastewater recycling facilities to serve the Settlements of LaFox development and (iii) completed (or caused other parties to complete) numerous infrastructure improvements to support the future expansion of the MCWRD's systems in order to accommodate the Subject Property. The improvements included the following items:

- (a) Gravity sand filters in the new sand filter building were sized to include the proposed development of the Subject Property.
- (b) A parallel forcemain from lift station 6 was installed for future connection to the Subject Property.
- (c) A bi-directional irrigation transfer line was constructed from irrigation station 1 to the MCWRD's north boundary for future connection to the Subject Property.
- (d) A 12" water main has been extended to the northwest corner of Neighborhood Y for a future connection to the Subject Property.
- (e) A 16" water main was originally constructed along Brundige Road to Keslinger Road for future growth to the north.

The MCWRD has relied on the requests from the Developers of the Settlements of LaFox to receive water and sewer service from the MCWRD, and the MCWRD has performed in accordance with that reliance, by expanding its FPA, obtaining permits for the expansions of its water and sewer facilities, and completing construction of the initial improvements. Accordingly, the MCWRD will be adversely affected by the course of action outlined in the requested amendment.

The requested amendment is not consistent with the long-standing goals of the Chicago Metropolitan Agency for Planning and the Illinois Environmental Protection Agency to employ the facilities planning area system to promote orderly design, construction, financing and operations of wastewater projects. In fact, the requested amendment will result in the proliferation of small water and wastewater systems and set a bad precedent.

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Therefore, the Trustees of the MCWRD hereby object to the Settlements of La Fox proposal to go it alone by duplicating water and wastewater facilities within the MCWRD Facilities Planning Area. The MCWRD is willing to consider all of the various cost-effective approaches to make this project work and is disappointed that the Settlements of LaFox developers have not contacted it to explore some of these alternatives.

Sincerely

MILL CREEK WATER RECLAMATION DISTRICT

By: 
Brian Grinstead, President

cc: Tim Kellogg