



Chicago Metropolitan Agency for Planning

233 South Wacker Drive
Suite 800
Chicago, Illinois 60606

312 454 0400
www.cmap.illinois.gov

MEMORANDUM

TO: Land Use Committee

FROM: Dawn Thompson, CMAP Staff

DATE: June 19, 2013

RE: Facility Planning Area Revised Procedures Manual

CMAP and one of its predecessors, has long served as the area wide water quality planning agency in northeastern Illinois. As such, it has aided in implementation of areawide water quality management plans¹ through the Facility Planning Area (FPA) review process. The FPA process provides an important means by which the inherent relationship between land use and water quality can be considered in an integrated fashion.

In light of a recent change to the FPA process² and the fact that the CMAP FPA Process and Procedures manual has not been updated since the 1990s, CMAP staff is reevaluating its role in executing the [FPA process](http://www.cmap.illinois.gov/water-quality/about-fpa-requests) to determine how it might better fulfill its area wide water quality management responsibility. (The original manual is available at <http://www.cmap.illinois.gov/water-quality/about-fpa-requests>).

CMAP believes that it would best add value to the overall water quality protection efforts within northeastern Illinois by focusing its planning expertise where it will have the most significant return. To do so, CMAP believes it should, as far as possible, align the FPA process to implement its regional comprehensive plan, GO TO 2040. It should also simplify and streamline the review process to avoid duplication of efforts between CMAP, Illinois EPA, and other agencies.

In an effort to realize this vision, CMAP has revised its FPA Process and Procedures Manual. Specifically, the draft manual (available at <http://www.cmap.illinois.gov/environmental-and-natural-res/minutes>) modifies the review procedures for FPA review Criteria to reflect GO TO 2040 priorities and other changes in the policy landscape. Specifically, the manual specifies that an FPA amendment request should be consistent with CMAP's regional forecasts. Its aim is to ensure that wastewater and other "gray infrastructure" expansion does not come at the expense of the regional green infrastructure network and that water conservation efforts are implemented throughout the

¹ Delegated authority to develop the area wide plan has its roots in the federal Clean Water Act (P.L. 92-500).

² Illinois EPA has ultimate authority for FPA reviews and recently announced it will no longer deny a State construction permit based solely on a project not being consistent with an FPA boundary.

region. It addresses criteria that would assist CMAP in maintaining its role in helping local governments resolve disagreements over their responsibilities for providing wastewater service and encourage intergovernmental cooperation. Lastly, the manual considers whether an amendment request is consistent with other county and regional plans, namely Go To 2040.

Additionally, staff proposes to cease reviewing [NPDES](#) permits and loan applications, which are handled by the Illinois EPA permitting stage. CMAP would also simplify the process by collapsing review of various Levels of reviews into a single review process.

The Land Use Committee is encouraged to provide feedback, especially in response to the following questions:

Questions:

1. What partners should staff engage for review of the revised manual?
2. How will local governments respond to the manual's request that applicants whose ordinances are inconsistent with CMAP's model nonpoint source ordinances pass a village board or city council resolution indicating their intent to adopt such ordinances?
3. How may Go TO 2040's goal to prioritize funding to communities engaging in intergovernmental planning be used within the FPA review process?
4. How may the Go To 2040's goal to achieve greater livability through land use and housing, with an emphasis on development patterns that support the use of public transit be used in the FPA process?

Action Requested: Provide feedback on the draft Process and Procedures Manual and specific recommendations for improvement.