



Chicago Metropolitan Agency for Planning

233 South Wacker Drive
Suite 800
Chicago, Illinois 60606

312 454 0400
www.cmap.illinois.gov

February 27, 2014

Cindy Skrukrud
Sierra Club
70 E Lake Street, Suite 1500
Chicago, IL 60601

Stacy Meyers
Openlands
25 East Washington Street, Suite 1650
Chicago, IL 60602

Dear Cindy and Stacy,

CMAP is in receipt of the letter dated November 6, 2013 from the Sierra Club and Openlands in response to proposed changes to the Facility Planning Area Process (FPA). Though CMAP staff met with you to address issues outlined in the letter, CMAP would like to provide a formal response to your letter.

CMAP, as the areawide planning agency continues to seek ways to best add value to overall water quality protection efforts within northeastern Illinois in the FPA process. In harmony with this objective, CMAP's revised FPA manual aligns its responsibilities in the FPA review process with CMAP's regional comprehensive plan, GO TO 2040. The manual also seeks to avoid duplication of efforts between CMAP, Illinois EPA, and other agencies. Therefore, CMAP has the following responses:

- **Review Criterion 1 (formerly Criterion 2)** – Criterion 1 specifies that households for which the proposed amendment is designed must fall within the 30-year forecasts most recently produced by CMAP for the relevant area. The Sierra Club and Openlands letter states that CMAP should request some form of validation for the service area to ensure an amendment request is based on serious development plans, such as evidence of zoning. While CMAP acknowledges these concerns, wastewater treatment planning is based on long-range planning and is expanded in sizeable geographic areas while zoning approval is incremental and short-range. CMAP believes that the requirement that a municipality have a comprehensive plan calling for the wastewater treatment plant investment and have forecasts that are consistent with CMAP's regional forecasts should be sufficient to assure validation in the FPA service area.
- **Review Criterion 2 (formerly Criterion 4)** – Criterion 2 states that the proposed amendment should not reduce the effectiveness of the water quality improvement strategy contained in the original plan, either for point source or nonpoint source control. The Sierra Club and Openlands' letter states that CMAP should retain Criterion 2 and continue to evaluate whether an amendment request meets the minimum threshold. CMAP continues to be vested in improving water quality in the region. However, the Agency does not believe it has sufficient information, namely a Total Maximum Daily Load in the vast majority of cases to make this determination. Furthermore, the intent of this criterion is addressed through the NPDES permit program.

Nonetheless, CMAP recognizes that the FPA process is just one of many tools that may be used to improve water quality and is vested in ensuring protections are in place. As an example, CMAP's Local Technical Assistance Program has helped numerous communities update their ordinances to reduce development impacts on water quality and other natural resources. As the official regional planning agency for northeastern Illinois, CMAP's directives and action plans are used to move the region towards implementing Go To 2040 to address population growth, open space and the environment. Similarly, CMAP's focus ensures wastewater does not come at the expense of the regional green infrastructure network. Green infrastructure, as addressed in Go To 2040 would significantly reduce stormwater discharges, reduce combined sewer overflows and reduce pollutant loads thereby improving water quality.

- **Review Criterion 3 (formerly Criterion 7)** – Criterion 3 specifies that the proposed amendment should not adversely affect adjoining units of government. Comments from the Sierra Club and Openlands recommend that CMAP evaluate the consistency of the proposed amendment with principles of Go To 2040 to invest in a communities' infrastructure. CMAP supports coordination of services and wishes to explore this recommendation in greater detail.
- **Review Criterion 4 (formerly Criterion 8)** – Criterion 4 states that the proposed amendment should be consistent with other county and regional plans or state polices. CMAP concurs with the Sierra Club and Openlands' recommendation that amendment requests should be consistent with county and regional plans and state policies including Water 2050, the Green Infrastructure Vision and additional plans specified in the letter.

CMAP continues to seek ways to work cooperatively with the Sierra Club and Openlands regarding proposed changes to CMAP's role in the FPA review process and to serve as responsible stewards of the region.

Sincerely,



Don Kopec

cc: Representatives of the Wastewater Committee

DPK/dt