REVISED FACILITY PLANNING AREA MANUAL COMMENTS

Topic Area	Recommendation/Comment	Source
Authority		
	CMAP's expanded review may be misinterpreted as undermining local control.	Wastewater Committee
	Concern that proposed revisions may go beyond the authority of the Wastewater Committee.	Wastewater Committee
Coordination		
Programs	Encourage coordination of state/local programs (e.g. NPDES, watershed plans, MS4,TMDL, RMSS) in the FPA review process in an effort to cut across Illinois EPA departmental boundaries.	Environment and Natural Resources (ENR) Committee / Lake County Stormwater Management Commission
CMAP Committees	CMAP Committees (e.g. Land Use Committee, ENR Committee) should be given an opportunity to review FPA applications with regional significance.	ENR Committee / Land Use Committee
Funding		
State Revolving Loan Fund (SRF)	FPA requests that are consistent with Go to 2040 regional planning objectives should be prioritized in the SRF Loan Program.	CMAP Staff / ENR Committee
US Dept. of Housing & Urban Development	Tie the FPA process to grant programs such as the Cook County Development Block Grant Program.	Land Use Committee

Green Infrastructure Vision (GIV)		
	Sanitary districts may have difficulty addressing the manual's request to adopt ordinances to protect the GIV.	ENR Committee
	Applicants should be given the option to adopt CMAP's model ordinances wholly or in part to protect the GIV.	Land Use Committee
	FPA applications impacting a specific amount of acreage within the GIV are required to describe the local government strategy that will be used to protect the GIV (e.g. board resolution, local open space fund, etc.). The manual should change the "trigger" from an acreage approach to a percentage approach.	Engineering Firm
	FPA applicants should adopt a county green infrastructure plan, where one exists, versus the regional GIV.	Engineering Firm
Review Criteria		
Conservation Design	Update the manual to include conservation design criteria based on Go To 2040 Objectives.	ENR Committee
County/regional plans	Amendment requests should be consistent with adopted municipal and county green infrastructure plans and adopted watershed plans.	Engineering Firm
	While state, regional and county land use policies should be considered, local authority should have the final say on local planning matters.	Metro West Council of Government
Farmland Preservation	Address local food in the FPA review process.	CMAP Staff / ENR Committee

Impacts on neighboring communities	Applicants are asked to provide a letter of "no objection" or a boundary agreement from any neighboring communities for the amendment request. However, this may be problematic for communities without a boundary agreement.	Metro West Council of Government
Infill/Redevelopment	Include infill/redevelopment in the FPA review process.	N/A
Livable Communities	Recommendations to improve livability through landuse, housing, and by conserving water and energy resources may be less applicable to communities on the fringes of the regional planning area.	Metro West Council of Government
Manage Energy Resources	The manual should be updated to request that applicants conduct an energy inventory audit to promote energy efficiency.	ENR Committee
	Expand the manual's energy efficiency discussion to encourage the use of digester gas for heating or power purposes.	Metropolitan Water Reclamation District of Greater Chicago (MWRDGC)
Nonpoint Source Pollution	The manual should be updated to encourage water reuse and include a discussion on land application. It should also include more examples of these types of recommendations.	Sierra Club
Point Source Pollution	Existing criteria, specifically criteria considering point source issues (Criteria # 1 and #5) should remain intact.	ENR Committee / Sierra Club
Population Projections	CMAP requires the use of regional population forecasts as part of its review process. Local forecasts, which are based on specific developments are often more accurate than Go To 2040 forecast predictions, should be used instead.	Metro West Council of Government

	An applicant is required to provide its service population forecasts and compare it to regional Go To 2040 forecasts for the same area. The percent of population divergence should include a latitude of 30%.	Metro West Council of Government		
	The manual states that the number of households for which the amendment is designed should fall within the 30-year forecasts produced by CMAP. However, 20 years is the normal planning horizon for FPA's and should be used for this process.	Metro West Council of Government		
Stormwater Ordinances	Update the manual to reflect the Cook County Stormwater Ordinance which was adopted October 3, 2013.	MWRDGC		
	Though the revised manual states all county ordinances, with the exception of Will County, have ordinances consistent with CMAP's model ordinances, inconsistency still exists. As an example, BMPs are not required in most countywide ordinances. In addition, most municipal subdivision codes do not include provisions for stormwater BMPs and green infrastructure.	Engineering Firm		
Public Review and Outreach				
	Notify sanitary districts, villages, trade associations, developer organizations, counties, Illinois EPA, USEPA, COG's, County Planners, Engineering Firms, Illinois Municipal League, and Professional Organizations, and various CMAP committees of changes to the FPA process.	ENR Committee		