



November 12, 2013

Dawn Thompson, Associate Planner  
Chicago Metropolitan Agency for Planning  
233 South Wacker Drive – Suite 800  
Chicago IL 60606

**Re: Proposed Water Quality Management Plan Amendment and Procedures Manual**

Dear Ms. Thompson:

Metro West Council of Government is an association of municipalities representing over 750,000 persons in Kane, Kendall and DeKalb Counties. One of our primary initiatives was the formation and administration of the Northwest Water Planning Alliance (NWPA) which brings together five counties and five councils of government to address water supply planning and water quality issues.

Thank you for the opportunity to comment on proposed revisions to the CMAP Facility Planning Area (FPA) review process. We appreciate that CMAP is updating the FPA Process and Procedures Manual to align it with implementation of GO TO 2040 in order to fulfill its areawide water quality responsibility. We understand that you are also attempting to streamline the existing review process to avoid duplication of efforts between CMAP, Illinois EPA, and other agencies.

We appreciate that the Amendment Request Processing Fees are unchanged and are assessed at \$10 per acre.

**We would like to submit the following comments on the proposed changes:**

Review Criterion No. 1 – “The households for which the proposed amendment is designated must fall within the 30-year forecasts most recently produced by CMAP for the relevant area. CMAP staff may agree to harmonize regional and local forecasts as provided in the Water Quality Management Plan Amendment Process and Procedures Manual.”

- CMAP requires use of their population forecasts to be used in the planning of facilities. While your forecasts are generally acceptable, from time to time CMAP’s regional forecast may not agree with a local forecast. Often times the local forecast is based on specific development information and may be more accurate than a prediction based on a regional trend. We recommend that the substitution of local population forecasts be reasoned and articulated, but not necessarily be based on the CMAP Forecasting Principles. We believe that the

local agency is in a better position to predict the future population of a discrete area than CMAP is using a regional model.

- The percent of population divergence needs to be filled in within this section. We believe providing a latitude of 30% up or down would be reasonable.
- 20 years is the normal planning horizon for facility planning and it should be used for this process.

Review Criterion No. 2 – “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.”

- Nonpoint Source Control Ordinances: Practically this item only applies to Will and Cook Counties.
- Water Conservation: This item is generally consistent with the NWPA goals and objectives.
- Regional Green Infrastructure Plan: No comment at this time.

Review Criterion No.3 – “The proposed amendment should not adversely affect adjoining units of government.”

- The general concept is acceptable, but this requirement may be somewhat problematic for communities that do not have boundary agreements with neighboring jurisdictions.

Review Criterion No.4 – “The proposed amendment should be consistent with other county and regional plans or state policies.”

- We agree that State, Regional, and County land use policies should be considered, but **the local authority should have the final say on local planning matters**. Updating a comprehensive plan, while desirable, may not be practical for smaller communities and may or may not be needed depending on the type of amendment that is being requested.
- Livable Communities: May be less applicable to the communities on the perimeter of the CMAP planning area.
- Energy Efficiency and Wastewater: Generally considered on facility expansions, but may not be warranted for all boundary expansion requests.
- Agricultural Preservation Areas: Appendix reference not provided.

We respectfully request that these comments be considered as you complete the process of updating the manual. We look forward to continuing to work with you on the revisions. If you

have any questions, please contact Peter Wallers, Metro West's consulting engineer and Chairman of the NWPA's Technical Advisory Committee. You may reach Mr. Wallers at 630.466.6721 or at [pwallers@eeiweb.com](mailto:pwallers@eeiweb.com) or Executive Director Mary Randle at 630.859.1331 [mrandle@metrowestcog.org](mailto:mrandle@metrowestcog.org).

Sincerely,



Brian LeClercq  
Village President



Brian LeClercq  
Metro West President  
Oswego Village President

Thomas J. Weisner, Chairman  
Northwest Water Planning Area Alliance  
Mayor of Aurora, CMAP Board Member

43 W. Galena Boulevard, Aurora IL 60506 630.859.1331 fax: 630.256.3169 [www.metrowestcog.org](http://www.metrowestcog.org)

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