

November 1, 2013

Woodstock – 08WQ081

To: Dawn Thompson

From: Cindy Skrukud, Sierra Club, 312-251-1680 x110

Stacy Meyers, Openlands, 312-863-6265

RE: Upcoming meeting on Proposed changes to CMAP's Facility Planning Area Review Process

Hi Dawn, You asked us to provide a memo prior to our scheduled meeting on Wed., Nov. 6 on the issues we wish to discuss in regards to CMAP's proposed changes to the FPA review process. We have outlined the topics we'd like to discuss below. Thank you for your time and consideration. We look forward to our conversation with CMAP staff next Wednesday!

I. **Introduction.** The existing elements of the Facility Planning Areas process directly supports and implements the fundamental principles of GO TO 2040. Pipes, like roads, have a profound impact on how our region develops. The FPA process, like other GO TO 2040 programs, lends careful consideration about population density, farmland preservation, environmental protection, and the most intelligent design of wastewater alternatives to give our communities the best opportunity to realize the vision of our regional plan. While we see value in updating the FPA process, we do not want to lose key criteria that have resulted in great changes to local requests. For instance, Woodstock, in response to the CMAP review, reduced its FPA amendment area from 8,000 to 3,000 acres, recognizing the value of its prime farmland to its communities and the region. Additionally, wastewater treatment plants, like the Village of Wonder Lake, have agreed at the design stage to use more stringent pollution controls to protect aquatic life. Waiting until after the FPA process, and the engineering design stage of the project, often results in an inferior or inadequate solution, which reduces the effectiveness of the water quality improvement strategy in Northeastern Illinois. (05WQ008 – FPA creation) or 06WQ205

II. **Criteria.** We support removing criteria 1, 3, 5, 6 and 9 if the following elements are included in the remaining criteria.

a. In Criterion 1 (formerly Criterion 2), we recommend that CMAP request some form of validation that the service area in the proposed amendment is based upon serious development plans, such as evidence of zoning approval.

b. We recommend that CMAP amend Criterion 2 (formerly Criterion 4) to specify that amendment requests must meet water quality standards. To uphold the primary purpose of the FPA process, it is crucial that CMAP evaluate whether the proposed amendment will meet this minimum threshold. While we understand Illinois EPA reviews such in its NPDES permit process, this criterion is also both relevant and central to CMAP's distinct role. We firmly believe that the CMAP process has its own individual merit and value, with a different focus than the IEPA.

c. We recommend that CMAP amend Criterion 3 (formerly Criterion 7) to evaluate the consistency of the proposed amendment with the GO TO 2040 principles to invest in existing communities and their infrastructure.

d. In Criterion 4 (formerly Criterion 8), we continue to stress the need to evaluate whether amendment requests are consistent with fundamental county and regional plans, and state policies, such as Water 2050, the Farmland Protection Policy Act, the Green Infrastructure Vision, the Biodiversity Recovery Plan, the Illinois Department of Natural Resources Biological Stream Ratings, the Illinois Wildlife Action Plan, the Conservation Design Resource Manual and relevant watershed-based plans.