



Bolingbrook

a place to grow

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375 W. Briarcliff Road
Bolingbrook, Illinois
60440-0951

www.bolingbrook.com

(630) 226-8400
FAX: (630) 226-8409
TDD: (630) 226-8402

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TO: DAWN THOMPSON
FRANK BEAL
DEBRA SHORE
WALLY VAN BUREN
RICHARD REINBOLD

FROM: MAYOR ROGER C. CLAAR

DATE: DECEMBER 23, 2013

As you will recall at our Wastewater Committee meeting on the 13th, we discussed at some length the proposed changes to CMAP's Facility Planning Area review process. I, along with others, indicated that it was a complicated document and needed some discussion.

Due to the nature of the document, I further felt that it needed a review by someone who has submitted plans and built wastewater facilities.

I further indicated that I would hire Michael J. Drey, P.E., recently retired Director of Public Works & Engineering for Bolingbrook, IL, where he assisted in the design, building and approval of two large sewage treatment plants. He also was involved in the private sector of doing several sewage treatment plants.

I asked him to review all of the documents we've been provided to date and highlight the significant areas of change.

My concern was the potential requirements being imposed by CMAP staff that "**were not**" requirements of the Illinois Environmental Protection Agency (IEPA). We all know that sewage treatment facilities can be approved by submission directly to the IEPA thereby by-passing CMAP. The IEPA generally just wants population and land use projections for a 20 year planning cycle (not 30) in their approval process.



TREE CITY USA

A Community of 74,000

Two documents are attached:

1. I asked Mr. Drey to give me a short and concise explanation of significant changes of CMAP from what is actually required by the IEPA. That document is enclosed and should be self-explanatory. Those additional burdens being placed on applicants by CAMP should be stricken from the document.
2. The second document is a copy of Page 10 from the "Water Quality Management Plan Amendment and Procedures Manual". The checklist items are not numbered but the first 12 are what is required by the IEPA. The next 8, or 13 through 20, are not "IEPA requirements" and should be stricken from the manual.

It is noted that some "engineering firms" signed off on some of these, but engineering firms that responded specialize in this kind of work and are looking for employment/billable hours.

I would be reluctant to even include those last 8 items as recommendations because that could infer a requirement. While that might be a nice thing to do, but in this economy with waste water facilities so terribly expensive to build and operate, it would drive up the costs of housing and taxes in communities. They are highly regulated with more regulations forthcoming (such as nutrient standards) at a great increase on cost to our communities. We are not in the position to place unnecessary suggestions or frills on local government.

DRAFT

**WATER QUALITY MANAGEMENT PLAN
AMENDMENT AND PROCEDURES MANUAL**

- Page 3 “The investments in question include constructing or modifying”
IEPA or NPDES change should **not** be subject to review.
- Page 3 “CMAP reviews are advisory in nature”
Will IEPA approve FPA amendment that does not have CMAP’s
recommendation? - Yes
- Page 4 “a. construct or modify”
Again, NPDES permit or IEPA changes **not** subject to CMAP review.
- Page 5 “30-year forecasts”
Should be 20 - the year is referenced later as 20 on Page 10
Twenty is correct!
- Page 6 “Model Stream and Wetland Protection Ordinance”
This is redundant; Corps of Engineers monitors and permits.
This is should **not** be a condition for approval.
- Page 6 “Water Conservation Ordinance”
Is not a condition for approval.
Too expensive to implement and needs local expertise.
- Page 7 “Regional Green Infrastructure”
Has **no** bearing on wastewater approval process.
Should be removed.

- Page 8 “Livable Communities”
**This is completely a local government decision not CMAP.
Should not be included in this report!**
- Page 8 “Energy Audit”
**This is not a planning issue; it is a design and operations issue.
Strictly local decisions!**
- Page 9 “Agricultural Preservation”
**Who determines what is preserved and who pays for that?
A letter from Department of Agricultural should not be a CMAP requirement.
It will be needed by the IEPA before a permit is issued.**
- Page 10 20 year housing forecast
**Not 30?
30 not required by IEPA.**
- Page 12 “Water Conservation”
**This is not required.
It is very expensive to implement and driven by local government needs more
than regional.
Should not be a condition for approval.**

Consultants, planners, and engineers won't comment on expanded and requirement changes because it makes more billable hours and expense to local government.

Appendices

The appendices included in the Water Quality Management Plan Amendment Process and Procedures assists applicants in understanding and responding to the review criteria. The appendices also guide CMAP staff and Committee members and the evaluation of the applicant's fulfillment of the review criteria and in issuing recommendations to the IEPA.

Appendix I: Water Quality Management Plan Amendment Application's General Information and Documentation Checklist

The FPA amendment checklist was developed to assist the applicant with submitting a complete application for review with the aim of improving the timeframe required for the review process. Applicants should enclose their completed checklist(s) with the application submittal. **Italicized Items are applicable to FPA boundary amendment requests only.**

Checklist Items

1	Water Quality Fee for Requested FPA Modification (at \$10 per acre)
2	Completed Applicant's Signature Page with an Original Signature
3	Contact Information
4	Summary of Type Amendment Requested
5	Maps of Existing FPA and <i>Requested Amendment Area</i>
6	Identify all Facility Planning Areas Within 1.5 miles
7	<i>Legal Descriptions of Existing FPA</i>
8	Documentation of Support by All Municipalities and the County Within the Existing FPA and Requested Amendment Area.
9	Facility Plan Including Components Required for CMAP's review (See Appendix III)
10	Go To 2040 Forecast for Amendment Area
11	Household Forecasts for the 20-year Planning Horizon
12	<i>Existing Land Uses and Zoning within and Adjacent to the Amendment Area.</i>
13	Most Recent Local Comprehensive Plan, Including Section of Plan Recommending Wastewater Infrastructure Expansion
14	Water Resources Ordinance Checklist (applicable for amendment requests within Cook or Will Counties only)
15	Applicable Resolutions Including Intent to Adopt Comparable Standards Within Six Months.
16	Water Conservation Codes in Force Within Amendment Area Or Description of Conservation Program
17	<i>Map Indicating the Presence of Green Infrastructure >50 acres</i>
18	<i>List of Protection Strategies Proposed for Amendment Requests Impacting Green Infrastructure >50 Acres</i>
19	<i>Resolution Indicating Protection Strategies that have been or will be Adopted for Amendment Requests Impacting Green Infrastructure >50 Acres</i>
20	Summary Indicating How the Proposed Amendment Promotes Livability. (i.e. align funding for planning and ordinance updates, review local and state plans)