Comments on the Revise	d FPA Manual		as of 11/7/13
Topic Area	Recommendation/Comment	Statement in Support of Comment	Source of Recommendation
Authority	CMAD		W
	CMAP's expanded review may be misinterpreted as undermining local control.		Wastewater Committee
	Proposed revisions go beyond the authority of the Wastewater Committee.		Wastewater Committee
Coordination			
	Encourage coordination of state/local programs (e.g. NPDES, watershed plans, MS4,TMDL, RMSS) in the review process to cut across IEPA departmental boundaries.	The FPA application/manual should ask if the request is part of an MS4? Is the applicant compliant? Does a watershed plan exist? Has the applicant adopted the plan? Are there any NPDES Permit violations? Does a TMDL exist?, etc.	Environment and Natural Resources Committee / Lake County Stormwater Management Commission
	Include additional CMAP Committees in review process	Develop procedures that allow additional committees, specifically the Environment and Natural Resources and Land Use Committees, to review FPA applications with significant regional impact.	Environment and Natural Resources Committee / Land Use Committee
Funding			2000 20 55 /
State Revolving Loan Fund (SRF)	Tie the SRF to regional objectives	Facilities plans that are consistent with regional objectives should be prioritized in the SRF program. Funding should be expedited for grants that meet regional objectives.	CMAP Staff / Environment and Natural Resources Committee
US Dept. of Housing & Urban Development (CDBG Program)		Tie the FPA process to grant programs such as CDBG. If an applicant demonstrates intergovernmental cooperation, grant funding may be expedited.	Land Use Committee
Green Infrastructure Vision (GIV)			
	Concern with the manual's request that a resolution be passed to address the GIV	Sanitary Districts have no authority over ordinance adoption. How will this be addressed?	Environment and Natural Resources Committee
		The manual's request must include some flexibility and allow communities to pass a resolution to adopt portions of CMAP's model ordinance versus the entire ordinance.	Land Use Committee
	Change the "trigger" from an acreage approach to a percentage approach.	Mapped GI is extensive regionwide and will appear, to some degree, on all applications.	Engineering Consultant
	An applicant should consider a county GI (green infrastructure) plan versus the regional GIV in counties where a GI has been adopted.	Applicants will be addressing more up-to-date data.	Engineering Consultant
Review Criteria			
Conservation Design	Update the manual to include conservation design criteria on per Go To 2040 Objectives		Environment and Natural Resources Committee
Point Source Consideration	Existing criteria, specifically Criteria 1 & 5 should remain intact.	Existing criteria is technical and cannot be supplanted by Go To 2040. CMAP as a regional agency should weigh in on regional decisions and consider both nonpoint source and point source impacts.	Environment and Natural Resources Committee / Sierra Club
·	Include infill/redevelopment in the FPA review process		
Farmland Preservation	Address local food in the review process.	Qualitative data should be used to address local food since no quantitative data exists. The application should ask the following: 1)Does the FPA include a cluster of food operations? Does the FPA include prime farmland? Will the rural character of the land be impacted by the request? Will the request negatively impact groundwater recharge?	CMAP Staff / Environmental and Natural Resources Committee
	Develop an energy checklist for requests to expand and/or build a wastewater treatment plant.	The Manual should harmonize with green infrastructure goals in the SRF Loan Program and consider the following: Does the wastewater treatment plant utilize digester gas or have plans to use electricity during off-peak hours? Does the wastewater treatment plant propose energy retrofits (e.g. retrofit old boilers, combine heat and power energy sources, utilize old digester heat, plan for peak electricity uses, etc.)? The application could add value by providing information on various steps applicants may take to promote energy efficiency at the WWTP.	Committee
	Maximize discussion on the use of digester gas for heating or power purposes. Also, consider supplemental food for additional digester gas production.		MWRDGC
	Update the manual to reflect the Cook County Stormwater Ordinance.	The Cook County Watershed Management Ordinance was adopted on October 3, 2013, with an effective date of May 1, 2014. The manual should reflect this recent action.	MWRDGC
	Inconsistency exists between CMAP's model ordinances and countywide and municipal ordinances.	BMPs are not required in countywide ordinances. Most municipal subdivision codes do not include provisions for stormwater BMPs and green infrastructure.	Engineering Consultant
	Amendment requests should be consistent with adopted municipal and county GI plans and adopted watershed plans.		Engineering Consultant
Public Review and Outreach			

	Illinois EPA, USEPA, various CMAP committees.		Committee
	Include COG's, County Planners, Engineering Firms, Illinois Municipal League, and Professional Organizations	Outreach efforts should be far reaching.	Land Use Committee
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Acronyms	Tabel Marriagnas Daiby Land		
TMDL	Total Maximum Daily Load		
RMMS	Resource Management Mapping Service		
WWTP	Wastewater Treatment Plant		