



# Chicago Metropolitan Agency for Planning

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February 27, 2014

The Honorable Roger Claar, Mayor  
Village of Bolingbrook  
375 W. Briarcliff Road  
Bolingbrook, Illinois 60440

Dear Mayor Claar:

CMAP is in receipt of the Village of Bolingbrook's letter submitted in response to proposed changes to the Facility Planning Area Amendment Review Process (FPA). CMAP staff has had several discussions about the issues raised in your letter and would like to take this opportunity to address your concerns.

- **NPDES Permits** - Specifically, the Village does not support CMAP's review of NPDES construction permits or permits to modify wastewater facilities. We agree. The revised FPA manual, as presented, eliminates CMAP's review of NPDES Permits in an effort to eliminate duplication efforts between IEPA and CMAP. CMAP would still consider requests for new and expanded wastewater facilities are specified in the Illinois Water Quality Management Plan, which was developed in response to the Clean Water Act.
- **Population Forecasts** - The Village believes proposed amendment requests should be designed to fall within a 20-year forecast period. Rather than a constant 30-year forecast, CMAP is proposing that the horizon year of the region's long range plan, GO TO 2040 be the basis for the forecasts used. IEPA uses CMAP's population forecasts as a barometer for projects and confirmed it would be able to use these forecasts to indicate major forecasting discrepancies.
- **Model Stream and Wetland Ordinance** - In the case of CMAP's Model Stream and Wetland Ordinance, the Village does not support review of this ordinance since the Army Corps of Engineers (COE) monitors wetlands. Though CMAP's acknowledges the Village's comments, management of isolated waters and wetlands is beyond the scope of Section 404(a) of the Clean Water Act and the Army COE's review. Yet, CMAP's Model Ordinance includes such provisions.
- **Model Water Use Conservation Ordinance** - The Village believes that CMAP's Model Water Conservation Ordinance is too expensive to implement, needs local expertise and should not be a condition for approval. However, water conservation is one of the twelve major recommendations of GO TO 2040. It is also an objective of the Areawide Water Quality Management Plan, the basis of the FPA process. Similar to an objective of the Areawide Water Quality management Plan, recommendations from GO TO 2040 and Water 2050 emphasize the importance of water use conservation in all sectors to maintain demand at levels that are comparable to supplies.
- **Regional Green Infrastructure** - In the case of regional green infrastructure, the Village states that consideration of regional green infrastructure has no bearing and should be removed. However, one of the goals of GO TO 2040 is to ensure "gray infrastructure" does not come at the

expense of the green infrastructure network. Furthermore, coordinated investments in land protection help protect water quality. This has a direct bearing on wastewater planning and management.

- **Livable Communities/Energy Audit** – The Village believes that the FPA manual’s discussion on Livable Communities should be dismissed since this is a local decision. It also opposes the manual’s recommendation that CMAP request amendment applications to conduct an energy audit of their wastewater facilities. It should be noted that the manual merely recommends that applicants consider GO TO 2040’s core strategies that address applicable livability issues. A recommendation of nonsupport for an application would not be based on an applicant’s consideration of these topics.
- **Agricultural Preservation** - In the case of agricultural preservation, the Village believes that a letter from the Illinois Department of Agriculture (IDOA) should not be a CMAP requirement. This point is duly noted. While CMAP has requested that the current IDOA requirements be dropped from its review, the IEPA insists that this requirement remain part of CMAP’s process in accordance with the Farmland Preservation Act.

We would appreciate the opportunity to discuss with you our proposed changes to CMAP’s role in the FPA review process. We look forward to working cooperatively with the Village of Bolingbrook to develop a meaningful review process.

Sincerely,



Don Kopec

cc: Representatives of the Wastewater Committee

DPK/dt