



Chicago Metropolitan Agency for Planning

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February 27, 2014

The Honorable Brian LeClercq
Oswego Village President
Metro West Council of Governments
43 W. Galena Boulevard
Aurora, IL 60506

Dear President LeClercq,

CMAP is in receipt of the Metro West Council of Governments letter in response to proposed changes to the Facility Planning Area 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.

CMAP, as the areawide planning agency continues to seek ways to best add value to overall water quality protection efforts within northeastern Illinois in the FPA process. In harmony with this objective, CMAP's revised FPA manual aligns its responsibilities in the FPA review process with CMAP's regional comprehensive plan, GO TO 2040. The manual also seeks to avoid duplication of efforts between CMAP, Illinois EPA, and other agencies. Therefore, CMAP has the following responses to your concerns:

- **Review Criterion 1** – Criterion 1 specifies that households for which the proposed amendment is designed must fall within the 30-year forecasts most recently produced by CMAP for the relevant area. Specifically, the Metro Council of Government recommended that local population forecasts be based on local forecasts, but not necessarily on CMAP's Forecasting Principles. It was also stated that the normal planning horizon for FPA requests should be 20 years. In response, 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. Furthermore, the FPA manual gives an applicant an option to rely on Go To 2040 forecasts or prepare an alternative, including local planning forecasts, that adhere to CMAP's Forecast Principles.¹ Lastly, the IEPA confirmed that it would still find CMAP's 30-year forecasts as essential when evaluating amendment applications.
- **Review Criterion 2** – Criterion 2 states that 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. Comments from the Metro West Council of Governments letter suggest concurrence with CMAP's approach.
- **Review Criterion 3** – Criterion 3 specifies that the proposed amendment should not affect adjoining units of government. Comments from the Metro West Council of Governments letter suggest that this requirement may be problematic for communities without a boundary agreement. In response, CMAP is of the position that the FPA process should not be used as a way to invalidate a boundary agreement. However, CMAP understands that a boundary agreement may not be applicable in every

¹ Chicago Metropolitan Agency for Planning's Forecasting Principles, (accessed March 3, 2014)

instance. Therefore, the manual provides guidance for amendments in the absence of a boundary agreement.

- **Review Criterion 4** – Criterion 4 states that the proposed amendment should be consistent with other county and regional plans or state policies. The Metro West Council of Governments letter states that the manual's request that an updated comprehensive plan be submitted with an FPA application may not be practical for all communities. Additionally, the manual's discussion on energy efficiency may not be applicable to all FPA boundary expansions. Lastly, the Appendix reference on agricultural preservation does not include a reference. In response, CMAP understands that limited resources may inhibit some communities from submitting an updated comprehensive plan. This limitation will be considered on a case-by-case basis when considering amendment requests. However, CMAP strongly believes consistency among a local comprehensive plan and CMAP's regional plan indicates good planning. As such, communities should strive to adhere to suggestions outlined in the manual. CMAP also acknowledges that energy efficiency may not be applicable to all FPA requests, but should be considered by all requests for an expansion of wastewater services. Lastly, the revised manual will include an appendix reference for the Agricultural Preservation Areas excerpt.

CMAP appreciates responses from the Metro West Council of Governments and continues to seek ways to work cooperatively with your organization regarding proposed changes to CMAP's role in the FPA review process.

Sincerely,

A handwritten signature in black ink that reads "Don Kopec". The signature is written in a cursive, flowing style.

Don Kopec

cc: Representatives of the Wastewater Committee

DPK/dt