



March 2, 2015

Concord Township
Board of Supervisors
43 S. Thornton Road
Glen Mills, PA 19342
610-459-8911
office@concordtownship.org

Dear Concord Township Supervisors,

Delaware Riverkeeper Network is writing with concerns regarding the 230-acre development proposal, Vineyard Commons, for the Woodlawn tract property located in Concord Township. We urge the Supervisors to work with the concerned community and preservation organizations to protect this parcel and preserve it rather than giving approval for the next phase of this proposed 160 single family housing development that would affect the quality and sensitive habitats of a deserving Pennsylvania Exceptional Value stream and unique valley and recreation area for the region. There are many violations and deficiencies to the existing development plan and the revisions made by the developer need to be reviewed by the County Planning Commission before being advanced by Concord Township. For example, there are 14 violations of provisions in the Stormwater Management Plans and over 30 violations with provisions of the Subdivision and Land Development ordinance (SLDO) for the Township. We understand there are major concerns with the use and placement of stormwater basins, that by design, may lead to exacerbated flooding and pollution downstream.

This area has unique sensitive habitats that deserve protection and preservation. The 2011 natural heritage program for Delaware County indicates core forested habitat still remains in the Beaver Valley Watershed, including sections that are considered interior forest. Schmid & Company found associated wetlands in the Beaver Valley that have the presence of Threatened or Endangered (T&E) species of plants or animals. State law requires that such wetlands be classed as Exceptional Value (25 Pa. Code 105.17) and protected. The presence of T&E species tie in wetlands, also deserving of EV status, that are connected to the petitioned Beaver Creek, which support the highest level of protection for the Beaver Creek watershed.

Delaware Riverkeeper Network is a supporter of the Beaver Creek stream upgrade petition that was submitted to the Pennsylvania Department of Environmental Protection (PADEP) last year. Beaver Creek flows into Brandywine Creek, a tributary to the Christina River which is a tributary of the Delaware River.

DELAWARE RIVERKEEPER NETWORK
925 Canal Street, Suite 3701
Bristol, PA 19007
Office: (215) 369-1188
fax: (215) 369-1181
drm@delawariverkeeper.org
www.delawariverkeeper.org

As you know, the Brandywine serves as a major drinking water supply for central Chester and northern New Castle Counties. The Brandywine Creek has six surface water intakes and numerous public water supply wells and substantial groundwater resources exist within the vast majority of the Brandywine Creek watershed to serve as a significant source of water supplies. It also serves as the only source of drinking water for the city of Wilmington, DE, which has a population of over 71,000 people (2013 census). By protecting the Beaver Creek basin, a relatively rural Brandywine tributary, whose healthy forested buffer remains largely intact (compared to some of the Brandywine's other more developed tributaries), the Township would be helping to protect part of the drainage of a critical water supply while also preserving an area with abundant recreation for your residents.

DRN also would like to express that a nearby Columbia high pressure gas pipeline could put new houses and a residential families at risk if this development was built. It is important and critical that the township review the potential impact radius of the existing and expanded gas pipeline, which received a green light to begin just last week as part of the eastside Expansion project.

For the above reasons, we urge you to vote not to greenlight this project along its destructive path at your regularly scheduled March meeting.

Sincerely,

Maya K. van Rossum
the Delaware Riverkeeper