



August 30, 2017

Stormwater Management Advisory Committee
Radnor Township
Email only: prpcomments@radnor.org

Re: Radnor Township, Delaware County, PA
Pollutant Reduction Plan DRAFT

Good day,

The Delaware Riverkeeper Network respectfully submits these comments on the above captioned Plan to be incorporated into the Record of Consideration.

Comment: As the tables in Radnor’s plan demonstrates throughout (including Table 6, Existing BMP Reduction Credit), and as PADEP’s guidance for the Pollutant Reduction Plans recognizes, stormwater volume reduction strategies provide the greatest benefit for improving water quality and accomplishing regulatory water quality requirements. These are also the strategies that will provide the most flood reduction and protection benefits for Radnor communities and those living downstream outside of Radnor’s municipal boundaries. Volume reduction, along with vegetated buffer protection and restoration, the very approaches that the Delaware Riverkeeper Network has been urging Radnor Township to embrace for (literally) 20 years, is the approach that will best protect public and private properties from being eroded away and undermined, thus inflicting property loss and damage at the site of the erosion and further downstream. . We are pleased that Radnor is finally seeming to understand and embrace this approach to stormwater management and to no longer just give it lip service, but to actually seek its implementation.

Comment: The Plan states (Sec IV, E., page 25) “Multiple BMPs are proposed to achieve the reduction in pollutants...” and that “...preferential consideration was given to BMP projects that met any criteria listed below, as these criteria provides a greater likelihood to successful implementation...” The stated criterion includes:

- Proposed BMP is located on municipal property
- Proposed BMP was identified in previous Township stormwater studies
- The existing storm sewer network is conducive to collecting a large drainage area to a BMP
- The proposed BMP would address a large impervious area such as a large parking lot

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While we understand that this is a wide criterion and one devised to incorporate many BMPs that will allow the Township to reach their targeted 10% sediment load reduction (307,280 lbs/yr – Table 7, page 24), most of these BMPs (15 of 24; 62.5%) are located on privately-owned properties. The Delaware Riverkeeper Network has encouraged the township to consider privately owned lands and to not limit itself to just municipal lands and so are pleased to see the Township open its minds on this point. But, that being said, give that 62.5% of the proposed projects are on privately owned lands, there needs to be some additional clarification – if the township truly believes there is a lesser likelihood of success on these privately owned lands, how will the township overcome the hurdles it presents? Will there be changes to the township municipal code to ensure that privately owned lands subject to future development/redevelopment will be required to incorporate similar BMPs so that in the future the township will not have to go back to property in private ownership to pay for implementation of similar practices, but instead will avoid the problem all together? Will the Township include modifications to the stormwater fee to incentivize property owners to embrace the BMP's the Township is proposing for their properties?

Comment: The Delaware Riverkeeper Network absolutely opposes Radnor Township trying to use this MS4 Pollutant Reduction Plan vehicle as a mechanism to try to strong arm the Radnor Township School District into implementation of projects on school owned property. While the plan refers to the North Wayne field, site of the North Wayne Basin, as publicly owned, the truth is that this is school district property secured and utilized for the School District's children. Radnor Township is well aware that action at this site is highly controversial and that the School District has been highly opposed to many of the Township's proposed plans for the site. Given this history, it is inappropriate for the Township to include this site in its plans and thereby attempt to, once again, strong arm the school district into accepting a project at this site that has not been the subject to pre-negotiation and agreement. The Delaware Riverkeeper Network will make clear to the Pennsylvania Department of Environmental Protection that this is a highly controversial site and project and that including it in this plan and claiming over 17,000 lbs/yr of reduction credit is highly inappropriate given the current position of the school district with regards to the Township plans at this site. In addition, simply continuing to maintain this basin as once focused on detention, with no effort to reduce the volume of water that drains to it or to introduce infiltration or vegetation is simply wrong. Before this highly controversial project can be included in any plan or planning there needs to be agreement from the school district. The school district has repeatedly rejected the Township's proposed plans. There is no reason to believe that will change without advance dialogue and agreement. Therefore it is highly inappropriate to include this project in this Pollution Reduction Plan. It smacks of a disingenuous effort to trick the PA Department of Environmental Protection into becoming an unwitting partner in the Township's ongoing effort to bully and strong arm the school district.

Comment: Delaware Riverkeeper Network supports the plans to retrofit detention basins so as to include vegetation and infiltration capacity, including the proposed plans for the Radwyn Apartments and Eastern University.

Comment: Delaware Riverkeeper Network supports plans to restore vegetated buffers along streambanks such as the Cowan Park Stream restoration proposal. But we are disappointed to see how little has been included with regards to restoration of vegetated buffers including along the township owned farm field (the Wheeler Field) and the Willows, both of which drain to tributaries of the Darby Creek that is both impaired and suffers from flooding both within Radnor Township and downstream where significant harm is inflicted on economically challenged communities. The Township owns both of these properties (the Willows and the Wheeler field), both suffer from severe erosion and pollution inputs as the resulted of denuded stream banks. Camp Run which flows through the wheeler field is significantly impacted by zero vegetation as it runs to and through the field, and by the regular tromping of the cows in, around and through the creek. The banks are tromped down by the cattle who also avail themselves of use of the creek as both a drinking water supply but also their toilet, urinating around as well as directly into the stream. The stream also is impacted by runoff from

upstream and the farmlands themselves. The tributary to Little Darby Creek that passes through the Willows is suffering from severe erosion as the result of the Township denuding the banks just a few short years ago. There was a minimal buffer in place as it was, already subjecting the creek to unnecessary runoff, but with the unnecessary removal of all vegetation along the creek the level of erosion has magnified tremendously. There are another of buffer restoration options like these that are easy fixes and should be considered and included in the plan.

Comment: Delaware Riverkeeper Network supports plans to introduce porous paving into parking lots in the Township. But we would be remiss if we did not note that the township recently expanded its own parking lot in ways that increase and exacerbate stormwater runoff, including expanding very close to the neighboring creek.

Comment: Delaware Riverkeeper Network is pleased to see the West Wayne Preserve wetlands project included in the plan. This is the most advanced of the BMPs from a preliminary analysis and planning perspective. In addition, given all of the investment the Delaware Riverkeeper has made in securing the initial assessment of stormwater benefits, in securing community support for preservation and restoration of the tract, and in planning for how it could be restored, this is also a project where we continue to work to try and secure financial resources for its implementation, which is additional value added for the Township.

Comment: Delaware Riverkeeper Network was disappointed to see that so much of the plan was simply about extending detention times in existing basins, not seeking to include vegetation or other basic strategies for improving stormwater benefits and contributing other ecological and community benefits. We would hope Radnor will revisit this plan and, at a minimum, seek to include plantings in those retrofit plans. Vegetation will not only improve the ecological value of the basins, but the introduction of the plants and their root systems will help to encourage stormwater infiltration and evapotranspiration while increasing the removal of pollutants.

Comment: The O&M Activity and Frequency (Sec IV, G., page 132) provides recommended BMP maintenance for each of the 25 proposed BMPs identified in this PRP. Under the “Raingarden/Bioretenion” projects (Radwyn Apartments and Eastern University), there should be the maintenance activity notation of “remove accumulated debris and sediment 2x annually” added.

Comment: Since new development can increase the volume of stormwater and associated pollution, scientific experts as well as federal and state agencies support preventing and reducing the volume of stormwater runoff as among the most effective strategies for protecting communities from flooding, erosion and stormwater-induced water pollution. Now that the township is realizing the significant economic, as well as ecological and safety, costs of having to go back and repair the damage caused by inappropriate, detention-based stormwater strategies, as well as overly damaging development practices including removal of vegetated buffers, DRN once again encourages Radnor’s municipal leaders to prioritize updating its municipal ordinance to ensure that new development projects proposed in Radnor use these better development and stormwater strategies from the get go. We also urge the Township to view redevelopment projects as opportunities to utilize the new stormwater science, technology and scientific research regarding the benefits of vegetated buffers, to undo existing stormwater problems and so will mandate such practices for redevelopment projects over an appropriate size threshold.

By reducing runoff volume, these strategies prevent the stormwater that otherwise causes or contributes to flooding. Stormwater strategies that reduce runoff volume also reduce runoff velocity and pollution. As a result, those volume reducing strategies provide protection to our homes, properties, bridges and roadways from flood damages and erosion; protect our creeks from pollution which helps reduce the cost of complying with state and federal laws, and make our creeks safer places for kids to visit, fish and play.

The standard detention basins that Radnor continues to support as a primary stormwater strategy, are merely designed to collect runoff and not reduce it. This out-dated engineering only ensures that nearly every drop collected in those basins flows to the creek where it continues to cause or exacerbate flood damages, and contribute to erosion and pollution problems. In addition, Radnor's failure to encourage significant buffer protections, and merely requires minimal vegetation widths along streams, and its continuing to allow developers to overly cut trees, compact soils and impose new impervious surfaces, maximizes development induced problems in the township.

It is important that a new stormwater ordinance be immediately advanced as part of Radnor's plans for its stormwater management future and that the ordinance advanced and passed mandate volume avoidance and reduction development and stormwater management practices, that it embrace and rely upon current science and experience and that it prohibit continued use of past practices known to increase the harms of flooding, pollution and erosion.

To the degree there will be township officials who will cry foul for the expense of the proposed retrofits and projects, we would be remiss if we did not point out that this required expense is the result of township officials being unwilling to mandate and implement (even on its own projects) buffer protections, development practices and stormwater management strategies that would have avoided, and even alleviated, the adverse impacts of stormwater and development. Again, the Delaware Riverkeeper Network can document that for over 20 years we have asked you to address the inappropriate development, buffers destruction and stormwater practices that the Township has allowed and you have refused to do so. While some Township officials have sought to say the right words on these matters, consistently when you have had a chance to actually render a decision or implement a project that would have changed the trajectory of damage being inflicted by development and stormwater in Radnor, officials have failed to do so. It is time for that to change and rather than crying foul, for Radnor Township to exercise leadership in how it advances development, redevelopment and stormwater management in Radnor Township.

Please feel free to contact DRN to discuss these comments. Thank you.

Respectfully submitted,



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the Delaware Riverkeeper



Fred Stine
Citizen Action Coordinator