



**To: Radnor Stormwater Advisory Committee
Steve Norcini, Township Engineer
Bob Zienkowski, Township Commissioner**

Cc: Radnor Township Board of Commissioners

From: Maya K. van Rossum, the Delaware Riverkeeper

Date: November 12, 2015

Dear Committee members I would like to share the below comments regarding discussions from your previous two meetings:

Regarding Banbury way project options –

The figures provide information on flood volume addressed but it fails to translate the flood volume into flood damage reduction benefits of each option? Information regarding the flood levels in the areas of concern needs to be articulated along with a discussion of how much those waters will be lowered and flood damage will be reduced.

Ithan/Runnymede –

The township parking lot concept, with the inclusion of vegetation, is a good idea and worthy of ongoing pursuit and planning. Exploration with the library of the options necessary to accommodate this is of course important.

Targeting school district property for yet another project without first talking to the school district is inappropriate.

Darby Creek Flood Damages

In meeting minutes from your previous meeting concerns were expressed regarding flooding and flood damages in the Darby Creek watershed. Given that, as well as the efforts of the committee to consider upcoming project expenditures, I would suggest it would be a good time for the committee to secure an updated presentation on the West Wayne Preserve project. The West Wayne Preserve stormwater project has preliminary design plans and engineering calculations that put it on par with the other projects you are already considering.

Public property investments versus private property investments.

I would like to reiterate -- limiting the analysis of solutions to only publicly owned lands denies the township and the committee the opportunity to look for best solutions for reducing flood damages.

In fact, the request by Steve Norcini at your meeting to look at the Highview Drive swale and the Mapleview Drive swale would result in investments on private property. Your current policy should prevent consideration of solutions on these properties which does not seem to be a good outcome in either instance. These swales are an opportunity to install best management practices that can provide stormwater and water quality benefits downstream while addressing an apparent safety hazard and equity issue. (Simply installing rip rap at one or both of these locations would be a missed opportunity that I would oppose.)

As the 9/10/2015 presentation noted, there are relatively few properties that fulfill the ownership constraint placed on the analysis, and so right from the get go the universe of solutions is limited. Additionally, areas experiencing flood damages are often downstream of large parcels held in private ownership, or well-developed residential areas owned by a large number of individuals, failure to consider solutions within these privately held parcels denies those living downstream the opportunity for effective flood damage reduction and relief. If Radnor truly wants to address flood damages in the township it needs to be open to an array of volume reducing solutions regardless of land ownership. The goal should be to solve the problem, and that means considering all of the options for a solution.

If a stormwater project were implemented on private lands the township can require that it secure a level of ownership so that it can ensure the project is properly maintained in perpetuity and that it “gets something” for its investment of public dollars – conservation easements or other ownership rights easily accomplish this important goal. In addition, allowing stormwater fees to be used for projects on privately held lands also opens up the opportunity for cost sharing on projects, thus helping the township’s stormwater dollars to stretch even further. If you have a rule or policy against use of the stormwater fee on privately held lands then this opportunity for cost sharing or collaborative projects is not available.

I would encourage the township to embrace a policy that allows stormwater fees to be used on privately owned lands if that will provide the best level of volume reduction and stormwater damage reduction for the community.

Dam Projects

Unless the dams that were built are for stormwater or flood purposes they do not properly fall to the stormwater fee. E.g. if the Mill Dam is by virtue of a road construction then it is a road project, not a stormwater project. If the dams were built for flood purposes then a solution that permanently removes the dam(s) should be considered as a top option.