



**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: December 10, 2015

Dear Stormwater Management Advisory Committee members I would like to share the below comments regarding discussions from your December 10, 2015 meeting:

102 Cumberland Place.

Mr. Burgmayer's recommendation that there be outreach to the Radnor Valley Country Club regarding the credits program in order to incentivize a stormwater volume reduction project makes a lot of sense as a quick action starting point for addressing the flooding problem discussed at 102 Cumberland Place.

But I do think it is problematic that Committee members seem to be distinguishing between "public" stormwater and "private" stormwater, and "private" properties experiencing problems versus problems in "public areas". By these distinctions the Committee has tied its hands. All stormwater runoff is a combination of water coming from public and private lands; and the areas that will benefit will always be a combination of public and private lands. By limiting committee consideration to stormwater created by "public" lands and to solutions that primarily benefit only "public" areas the Committee is preventing its ability to consider all solutions, including the best solutions, for a given problem. By limiting yourself to being focused on solutions that address problems only on, or primarily on, public lands you are preventing your ability to consider areas in the community where private residents are experiencing high flood damages and problems in one, some, or even many homes.

Criteria to Guide Project Selection Criteria and Goals.

The committee has yet to lay out the criteria that will be used to guide which projects will be selected for design and implementation and what qualities you would like to see addressed with each project designed and moved to implementation. As a result, every presentation and discussion of options is

done in a vacuum and totally dependent on what committee members are present at any given meeting, what members of the public have attended a given meeting to present information, and what township staff or board members have spoken with the committee or public before or during the meeting.

It is important to have project selection criteria and/or expectations for the projects you want to see advanced – for example:

- ✓ Have a discussion of whether you are going to limit projects implemented with the use of stormwater fees funds to only public lands – that has been presumed but never discussed and officially decided upon;
- ✓ Projects should help the township meet water quality regulatory standards, or at a minimum not exacerbate problems, but cannot make them worse;
- ✓ Projects which include volume reduction will be prioritized over projects that are mere conveyance or peak rate controls but allow the volume of stormwater to remain the same or grow;
- ✓ Projects should benefit a minimum number of residents or achieve other articulated community objectives;
- ✓ That all project presentations give an understanding of the flood damages being experienced and the level of flood damage reduction or water quality benefit a project will provide;
- ✓ Etc.

The creation of these criteria would be an important way to engage the public early on in the process and secure community input to guide your decisions overall, as opposed to in a vacuum project by project. It would also allow for more thoughtful and objective community discussion unburdened by the high emotions and concerns that accompany discussions focused on whether or not to implement a particular project under consideration.

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.

Runnymede/S. Wayne Ave.

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.

I would like to reiterate, that when the RMS project was approved by the Radnor Board of Commissioners the project was to include going back up the hill to identify, design and implement a series of volume reduction projects as it was recognized that the only way to deal with the flooding in front of the emergency services building required reducing the volume of water coming down the hill. Your apparent limitation on looking at, and investing in, projects on private property prevents this kind of needed solution from happening.

Dan questioned whether the modeling reflected reality at Runnymede but by comparison he had seen and knew there was a problem at Banbury because he had seen it – to this I would like to say that I have seen this area during the smaller storms and seen a significant level of flooding there that is concerning. I do not think the modeling discussed is an exaggeration of the problem.

Banbury Way vs. Other Projects.

It was recommended that the Runnymede project should not advance until the township wide analysis was done so there can be a better prioritization of projects. Why would the same argument not apply to Banbury way?

Emergency Vehicles Issues.

There have been repeated assertions about problems with emergency service vehicles not being able to pass through portions of the community during rain events. Can the committee please share with the public the report it bases these assertions on. As far as I am aware there is no such study and the committee has just been using anecdotal information. If this is going to be an important part of your decisionmaking there is an obligation to gather this data objectively and comprehensively, not anecdotally.