

*Aquashicola/Pohopoco Watershed Conservancy ~ Berks Gas Truth
Brandywine Conservancy ~ Citizens for Clean Water
Clean Water Action ~ Damascus Citizens for Sustainability
Darby Creek Valley Association ~ Delaware Riverkeeper Network ~ Meliora Design
PennFuture ~ Pine Creek Valley Watershed Association ~ Raymond Proffitt Foundation*

December 13, 2013

Rev. Peter M. Donohue, O.S.A., Ph.D.

President

Villanova University

Villanova, PA 19085

Regarding proposed development and zoning change in Radnor Township

Dear Rev Donohue:

Villanova University has sought to position itself as a leader in the field of stormwater management – highlighting projects and education programs spearheaded by the University. And that is why the signatories of this letter are so surprised by the University’s most recent development project and the associated ordinance revision it has been pursuing in Radnor Township. Neither of these proposals incorporates the progressive stormwater management practices the University publicly professes or supports. As a matter of principle, Villanova should model best practices in the scale and design of its projects and ordinance language, to minimize all of its impacts on the environment – setting a strong example for other communities and developers to follow.

The signatories of this letter have a vested interest in clean water for Pennsylvania communities. Many of us have worked collaboratively with Villanova University staff members. And so, we respectfully request that Villanova University take a step back and reconsider the development proposal it is pursuing at the intersection of South Ithan and Lancaster Avenues and that it encourage inclusion of a progressive stormwater mandate in the Comprehensive Integrated College Development Ordinance it is proposing to Radnor Township.

Villanova presents itself as a leader in the field of stormwater management throughout the state, region and nation. At the semi-annual stormwater symposium hosted on Villanova’s campus, as part of the stormwater projects the University has undertaken in Philadelphia and beyond, and through the University’s community presentations, Villanova promotes the importance of proper stormwater management with a special emphasis on reducing stormwater impacts by reducing runoff volume and enhancing its quality. Among the strategies most notably supported and advanced by Villanova are infiltration basins, stormwater wetlands, riparian buffers, rain gardens, and other strategies designed to prevent and minimize runoff generation, and capture and/or treat

and infiltrate rainfall before it can enter streams and cause ecological damage and community harm.

Through our experience, we have seen Villanova University position itself as a partner for promoting smart development and progressive stormwater practices in communities, which is why it is disconcerting to us that Villanova's proposed project to be constructed at the intersection of South Ithan and Lancaster Avenues does not utilize the most protective stormwater and riparian buffer strategies. It also troubles us that Villanova further opposes a mandate for enhanced stormwater practices and stream protection strategies in the zoning ordinance change it is proposing and pursuing from Radnor Township.

The sketch plan of the proposed approximately 13 acre development project that is the underlying basis of the new ordinance it is seeking, shows the new development site to be managed by no fewer than five detention facilities for capturing and discharging 593,300 gallons of water, with only one small, unquantified rain garden incorporated into the project. Other than this one small rain garden, the project includes no porous paving with infiltration, no infiltration systems, no vegetated rooftops or other progressive strategies that are an integral part of the Villanova curriculum and characterize the water management leadership image of the University.

Additionally, representatives for the University have resisted recommendations that stormwater best management strategies including volume reduction and infiltration, as well as riparian buffer widths supported by the most recent science, be incorporated into the zoning ordinance change the University is seeking from Radnor Township.

Every redevelopment project is an opportunity to put in place new safeguards that will help enhance our communities and can undo the mistakes of the past. Many of us are well aware of the severe harm that Darby Creek flooding has unleashed on our communities, in homes and lives lost. Villanova's redevelopment of its parking lots and the zoning ordinance change it seeks for itself and other college institutions in Radnor are opportunities to bring about positive community solutions to serious problems, by using the stormwater and development knowledge on which the University publicly builds its reputation. By implementing a development project that minimizes the volume of runoff, and by supporting an ordinance change that mandates enhanced stormwater practices and riparian buffer protections for all college campuses availing themselves of the proposed ordinance change, Villanova could be taking steps that improve community quality of life, enhance water quality, and reduces stormwater runoff volume, which would reduce downstream flooding and damages – positive benefits that detention basins and 50 foot buffers will not provide.

We respectfully request that Villanova practice what it teaches. We ask that Villanova revise both its development project and ordinance proposal to include the use of today's most protective stormwater strategies including increased riparian buffers along streams, strategies for avoiding runoff such as vegetated rooftops and porous paving; strategies for

infiltrating stormwater runoff to the greatest degree possible in order to reduce volume; and strategies for treating the runoff that does result in order to ensure receiving streams are protected.

Respectfully,

Jim Vogt, President, Aquashicola/ Pohopoco Watershed Conservancy

Karen Feridun, Founder, Berks Gas Truth

Wes Horner, Senior Advisor for Water Resources, Environmental Management Center,
Brandywine Conservancy

Vera Scroggins, Citizens for Clean Water

Michael Roles, Program Organizer, Clean Water Action

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Alan Samel, President, Darby Creek Valley Association

Maya K. van Rossum, the Delaware Riverkeeper, Delaware Riverkeeper Network

Michele Adams, Principal, Meliora Design

Michael Helbing, Staff Attorney, Citizens for Pennsylvania's Future (PennFuture)

Ingrid E. Morning, President, Pine Creek Valley Watershed Association

John Hoekstra, Executive Director, Raymond Proffitt Foundation

Cc:

Radnor Township Commissioners

Radnor Township Planning Commission