



April 14, 2016

To: Stormwater CAC

From: Maya van Rossum, the Delaware Riverkeeper

Dear Committee members,

Re: Criteria to Guide Project Selection Criteria and Goals.

I would like to revisit the comments I gave at tonight's meeting during public comment, comments that I have provided previously in writing and during public comment.

As far as I can see, 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.

I have recommended on a number of occasions that such criteria and goals be clearly articulated. This concept has been endorsed and advanced by several CAC members as well. It is a process that can and should be done with invited public input and comment – perhaps request written comment in addition to inviting verbal comment at your regular meetings.

Can you please share with the public the status of this effort. If you believe it has been completed can you please provide for public review and comment the criteria and goals the CAC has created to guide its conversations, decisions and recommendations for the BOC.

Among many things, it is important to have project selection criteria and/or expectations and information regarding project options that touch on/consider items like the following:

- ✓ Can fees be invested in projects on public as well as privately owned lands - it has been presumed that only public lands are an option, but never discussed and officially decided upon.

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As I have said for the record I believe that is a mistake but whatever the decision it is worth considering and including it for all to understand;

- ✓ Can projects that will benefit Radnor communities be located outside the municipal boundaries, and if so in what circumstances;
- ✓ 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 should 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;
- ✓ All project presentations should give an understanding of the flood damages being experienced and the level of flood damage reduction or water quality benefit a project will provide;
- ✓ Discussion of options should begin with a clear understanding of the kind of flood damages that will be avoided (e.g. are we talking about landscaping? Basement flooding? First floor flooding?);
- ✓ Discussion of options should clearly identify the locations where flood waters will be reduced and by how much (e.g. how many inches or feet will be lowered at roadway intersections vs in back yards or basements for how many homes);
- ✓ Projects that will cause or contribute to other adverse impacts in the Township -- such as increased erosion of downstream properties or perpetuation or increase of water quality problems that will impede the township's ability to meet present and future regulatory obligations, will there be aesthetic or property value impacts, etc. – should not receive priority ranking in the decisionmaking process;
- ✓ All discussions should include a consideration of differing alternatives;
- ✓ Solutions with enduring benefits versus ones that will be overwhelmed or undermined because of possible downstream development in the future should also be lower down on the totem poll.
- ✓ Etc.

The creation of these criteria and consideration of these issues 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. And it will help the Committee identify and prioritize the best projects for stormwater fee investment.

Work Sessions

What is the status of the idea to have additional CAC work sessions? Also, I would like to confirm that these sessions will be open to the public.

With regards,
Maya