



Draft Radnor Stormwater Ordinance Released. Write the Commissioners and Urge Them To Require the Use of Best Science and Best Practices

Radnor Township has released an updated draft stormwater ordinance. Although the new ordinance is a good start, it continues to allow an increase in the volume of stormwater runoff that results from new development and creates a loop hole that grandfathers redevelopment projects. The Commissioners have a great opportunity to fix the inadequacies of the past, but the draft ordinance fails to be advanced and cutting-edge. Please take a moment and send the Commissioners a letter and urge them to make changes that will prevent further flooding, erosion and pollution problems and encourage them to see redevelopment projects as an opportunity to utilize the new stormwater science and technology that can undo existing stormwater problems.



Recommended Changes:

1. The updated ordinance needs to focus on volume management such that there is no increase in the volume of runoff from new development and redevelopment projects. The greatest improvement to flooding issues and water quality will occur by maintaining the natural hydrology of impacted watersheds to the greatest degree possible and by preventing an increase in the volume of runoff.
2. Some of the language in the current revision makes it difficult for developers to use advanced low impact development methods and green infrastructure which can be far more effective at volume reduction.
3. In order to compliment the increased focus on volume reduction, the ordinance should also include peak rate reduction requirements. As written, the draft ordinance fails to recognize the contribution to peak rate reduction that volume reduction provides, and as a result, there is no incentive for developers to utilize the best management practices that reduce runoff volume. An ordinance with both volume management and a complimentary reduced peak rate requirement, will encourage the use of the most progressive stormwater approaches.
4. The draft ordinance contains a loop hole for redevelopment projects which functionally grandfathers them from doing any additional stormwater management. As a result, the proposed revisions as they now stand, perpetuate the status quo of flooding and water

pollution resulting from stormwater runoff and prevents us from achieving the improvements necessary to protect flooded communities, to reduce pollution, and to comply with existing and soon to be instituted regulatory requirements . Instead, new stormwater management practices should be required every time redevelopment happens. The ordinance should ensure that redevelopment addresses the deficiencies of the past.

5. The draft ordinance is not aligned with legislative and regulatory requirements that are anticipated in the near future. Because revision of a township ordinance is a time-intensive and complex process, the ordinance should, at minimum, be progressive enough to pass muster with the Pennsylvania Department of Environmental Protection's (PADEP) proposed changes to the PAG-13 NPDES General Permit for Discharges from Small MS4s, of which Radnor is one. Otherwise, another new ordinance will have to be developed by 2019.
6. The ordinance should include a minimum 100-foot riparian buffer requirement which is scientifically supported as the minimum buffer width needed for flood damage reduction and water quality protection and is aligned with proposed state legislation requirements now moving through the state legislature. Again, this provision will put Radnor in compliance with future state requirements if passed and therefore, prevent the need for more revisions in the near future.

Sample letter text:

Radnor Township Board of Commissioners
301 Iven Avenue
Wayne, PA 19087

Dear Radnor Commissioners,

I write to urge you to please make additional changes to the Draft Stormwater Ordinance Revision. The new ordinance should require both new development and redevelopment projects to be part of a stormwater solution that focuses on volume reduction and healthy stream corridors. Existing development should not be grandfathered but instead should be recognized as creating a needed opportunity to address deficiencies of the past when redevelopment occurs. Additional revisions to the stormwater ordinance is needed to bring Radnor Township into better alignment with modern stormwater technology as well as legislative and regulatory proposals that are anticipated in the foreseeable future.

(insert 1 or more of the recommended changes from above)

By requiring the use of volume reduction along with best management practices, a progressive ordinance will enhance the community, reduce flood and flood-related costs, improve water quality, and prevent the need for another ordinance revision in the next few years to comply with proposed legislation and regulations when they pass. I hope that you will support forward advancement of water quality and water quantity protection in Radnor Township by including these additional proposed revisions.

Signed: