



Radnor Zoning Change Should Protect Against Increased Stormwater Runoff and Associated Flooding, Erosion, Pollution and Other Impacts

Your Voice is Needed

Please join in asking the Radnor Township Commissioners and Planning Commission to Ensure Needed Reforms Prior to Approval

The Radnor Township Commissioners have been asked to approve a new zoning ordinance, one that would allow for more lenient development on college campuses in Radnor Township. Villanova, Cabrini and Eastern would all be entitled to take advantage of the new rules. While Villanova is focused on using this new ordinance for its existing parking lots, other colleges have significant levels of low development and open space that could be targeted.

As proposed, Ordinance 2013-21 Comprehensive Integrated College Development (CICD) allows for significant levels of imperviousness – an estimated 80% imperviousness in the case of Villanova and 45% imperviousness for colleges who may seek to build in more “green” areas of their campuses. A number of the campuses subject to the CICD have streams that run through them and will be impacted by the increased level of imperviousness. High levels of imperviousness means high levels of runoff contributing to flooding, erosion and water pollution unless there are mandates that prevent those harms.

Flooding, erosion, and declining stream health are a problem for Radnor Township streams – including in the Darby Creek and Gulph Creek watersheds.

- Flooding along the Darby Creek downstream is so serious that homes and lives have been lost.
- Pollution caused in part by stormwater runoff is so significant that some streams have been listed on the state list of impaired waters requiring special regulations.

It is important the CICD ordinance becomes an opportunity to make these problems better, not worse.

Delaware Riverkeeper Network has provided specific language that would address the biggest environmental pitfalls of the CICD proposal:

- provisions that will require enhanced stormwater management;
- provisions that will require enhanced, science-based, riparian buffer requirements for streams;
- modification to the open space mandate to enhance its environmental protection benefits; and
- additions to the Impact Statement requirement so it can better withstand legal scrutiny if challenged.

Critical expert recommendations have also been provided by Friends to Preserve Radnor, who hired independent experts to provide specific language to ensure community protection and benefit.

[\(http://friends2preserveradnor.wordpress.com/to-radnor-residents/\)](http://friends2preserveradnor.wordpress.com/to-radnor-residents/)

Protection from Flooding, Pollution and Erosion By Reducing Runoff Volume.

Radnor’s existing stormwater ordinance does not include volume reductions as a focused goal. As a result, it is important that the CICD specifically include this necessary stormwater mandate.

While Radnor’s stormwater ordinance does include a pre-to-post groundwater recharge requirement and does include water quality protections and peak rate controls, it does NOT specifically require volume management. Volume control is important for flood control, water quality protection, pollution prevention, and stream bank protection – it is a key missing element that should be included in the CICD ordinance.

Protecting Streams, Preventing Pollution and Erosion with Science-based Buffers.

As written the CICD would only require a 50-foot buffer on impacted streams. Fifty-feet fails to reflect the buffer width that the Stroud Water Research Center and other respected stream ecologists, stormwater experts and regulatory agencies recommend. The science is increasingly clear that minimum 100-foot riparian buffers, preferably forested, are critical for providing water quality and habitat protection. Additional widths should be required for special protection waters and streams listed by the state as impaired. The CICD should reflect modern science and mandate minimum 100-foot stream buffers. To learn more about why 100 feet hear from the experts at: <http://bit.ly/DRN-BuffersVideo>)

Preserved Land Should Protect From Impervious Coverage.

The Preserved land obligation in the ordinance is currently linked to building coverage, not impervious coverage. Impervious coverage, whether it is in the form of buildings, parking lots, side walks, patio space, paved sitting areas, etc are all triggers for increased runoff. The preserved land obligation to mitigate these harms should be associated with impervious coverage as opposed to building coverage. In addition, the preserved land obligation should be for new open space, not areas already part of the campus, and should be lands that are primarily vegetated with native trees and shrubs.

Development Impact Statement Requirement Needs Legal Strength.

While the Development Impact Statement requirement in the CICD requires a look at a variety of issues, pursuant to municipal law, as long as an applicant can show they have complied with the objective standards set forth in the ordinance, the project will have a right to be built. And so the ordinance needs to include a set of objective measures that articulate what it means to impact the environment and community so that failure to meet those standards results in a failure to meet the requirements of the conditional use. The impact statement provision needs modification to ensure it provides a legal basis for saying “no”.

The Delaware Riverkeeper Network has provided specific language changes that would address these significant environmental concerns. (see http://bit.ly/DRN_villanova, or go to www.delawareriverkeeper.org, search “Villanova”.)

Please join us in urging a stronger CICD that will protect our environment and communities:

- ✓ February 12th, the Radnor Planning Commission will once again take up the issue.
- ✓ February 10th 7:30 pm the Commissioners had scheduled a hearing on the proposed ordinance – it is unclear whether they will maintain this date or reschedule until after the planning comm’n mtg.

Both meetings will be at the Township Building, 301 Iven Avenue, Wayne.

Meanwhile, send the Commissioners your concerns in a letter or email; consider including the following:

Dear Commissioners,

Please ensure the CICD zoning ordinance provides critical protections for our community and environment by ensuring the ordinance approved includes:

- ✓ specific provisions that will require meaningful stormwater volume controls;
- ✓ an increase in the mandatory buffer protection to 100 feet, with additional widths for special protection waters and streams identified by the state as impaired;
- ✓ a preserved land obligation linked to impervious as opposed coverage to building coverage;
- ✓ clarity that the preserved land obligation is for new open space, not areas already part of the campus, and should be lands are primarily vegetated with native trees and shrubs, not mowed lawnsapes;
- ✓ additions to the Development Impact Statement that make it legally stronger;
- ✓ the expert recommendations provided by Friends to Preserve Radnor, who hired independent experts to ensure the ordinance protects Radnor’s beauty and quality of life.