



To: Radnor Township Commissioners
Date: June 30, 2014
Re: North Wayne Park Detention Basin Proposal

The Delaware Riverkeeper Network would like to see the following questions answered regarding the North Wayne Park Detention Basin Proposal:

- ☞ The project is described as providing only “incremental improvement” to the frequency of flooding – what is “incremental improvement”?
- ☞ Did you use actual rainfall data in your calculations and modeling or did you simply use presumed rainfall curve numbers found in guidance?
- ☞ What kinds of flood damages are to be reduced or avoided with this project? First floor flooding? Basement flooding? Property erosion? Garden damage?
- ☞ What is the level of flood reduction that will be obtained from the proposed detention project – i.e. how many inches or feet will flood waters be lowered?
- ☞ What is the level of flood damage reduction that will result? Telling us how much the water level will lower is helpful but we also need to know what will be the reduction in damages – how much and what kind of damages will be reduced or avoided? What is the economic value of the damage avoidance?
- ☞ What is the full economic cost of the detention project being proposed?
- ☞ Why is the project only providing for a “small measure of water quality” benefit?
- ☞ Why is there no upstream or downstream compliment to this project to address volume and damages?
- ☞ How much of the field and space would be left for public use and play if this project were to move forward?
- ☞ Will the Township have to buy the field from the School District? If so at what cost?
- ☞ Chagrin Valley Associates, according to a 5/6/2014 presentation slide states that they were asked to answer “what is the most that can be done to control stormwater at that location” – North Wayne Park – why were they not asked the question: what is the best comprehensive strategy, or set of possible options, for reducing flood damages in North Wayne?
- ☞ According to the 5/6/2014 PowerPoint presentation, “Due to space limitation none of the options can meet current water quality regulations and will require partial waivers from infiltration, water quality and stream bank erosion permit requirements.” What permits will be required and from whom?
- ☞ If it is true that waivers of law would be required for the proposed project to proceed, what specifically are those waivers for and who would issue them?
- ☞ What are all of the permits and approvals required for this project to proceed?

- ☞ Why is the Township characterizing the Park property as theirs when it belongs to the school district? (CVE March 28, 2014 project summary)
- ☞ What alternatives have been considered and what level of flood reduction, flood damage reduction, and cost is associated with each individually and/or collectively?
- ☞ If \$623,599 is spent on this project what is the likelihood of this community benefitting from another project to take it beyond just the “incremental” benefits of this project?
- ☞ It has been said there will be incremental water quality benefits that may be received but with no quantification of what that means. What will be the quantity and value of the water quality benefit?

Our Request:

The Delaware Riverkeeper Network urges a comprehensive approach to resolving the flood damages issue in North Wayne that includes the following 4 elements:

- ☞ Projects/components that will reduce the volume of runoff before it reaches the North Wayne Park and downstream communities, thereby addressing the cause of the problem;
- ☞ Projects/components downstream of North Wayne Park that directly address flood damages to the degree possible and contribute further to reducing the volume and velocity of runoff that proceeds to downstream residents including things such as, addressing erosion issues by revegetating streamside lands, installing rain gardens or other onsite projects to further reduce runoff volume, considering voluntary buyouts and/or home elevation projects recognizing the reality that a number of the properties at issue were built in floodplains, wetlands and former water features;
- ☞ Committing to a strengthened township stormwater ordinance primarily focused on the reduction of runoff volume from both new development and redevelopment sites to be completed within a 6-month period to ensure every opportunity to avoid and reduce runoff volume in the future;
- ☞ Committing to undertake a complete and comprehensive plan for addressing the flooding problems in Radnor Township that is focused on volume reduction and restoring the natural effectiveness of streams and their floodplains to hold and carry floodwaters;
- ☞ If a project is to be implemented at the Park it must be one that does not interfere with the School District and public use of this important piece of community open space and that further reduces stormwater volume, thereby preventing it from being dumped on downstream residents.