



May 6, 2014

School Board members & Facility Committee members
Radnor Township School District
Wayne, PA

Dear School Board members and Facility Committee members,

I am writing about the North Wayne Field Township Storm Water System being brought forth for your consideration. The Delaware Riverkeeper Network has several concerns about this project and some questions that should be answered if the School District is to begin to get the quality of information necessary to consider the proposal.

If the School District does decide to turn this parcel over for the proposed stormwater detention system it is important to recognize that you are unlikely, and certainly not easily, ever going to be able to regain control for school district purposes.

As far as I understand it, the specific project being brought before you has only been finalized in recent weeks and so there is little in the way of specifics that have been put forth for public or School Board consideration; but the concept has been under discussion for well over a year and so it seems odd that only at this point, when the plans are so far along and so much money has been invested, that the Township would finally be reaching out to the School District. As the owner of the property at the heart of this project it would have been appropriate to include the School Board and the RTSD community much earlier in conversations about whether it is appropriate to put a stormwater project at this site in the first instance and if deemed suitable what should be the elements of such a project.

Frankly, it is neither fair nor appropriate for the Township to be coming to the School District for consideration and requested approval so late in the process, when money has been invested and expectations raised – approaching the decisionmaking process in this way is clearly unfair to the School District and, whether by design or by accident, injects the District into the process at a time when they are certain to receive unfair and undue community pressure. Given the level of sacrifice the District is being asked to make in the form of relinquished control over the North Wayne field, I hope the School District will not succumb to this inequity in the process and will take the time to give this issue due consideration.

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In a write up about the project it says: “The frequency of flooding will be reduced, though it is important to note that this is an incremental improvement and will not entirely eliminate the occurrence of flooding.” There needs to be some real specifics about the flooding and flood damage reduction benefits to be provided by this project, and time for due consideration of that information by the School Board and the public, before this project can be properly considered and decided upon.

The Delaware Riverkeeper Network is of the perspective that detention basins are rarely a good solution for stormwater problems, and should never be undertaken on their own, without a comprehensive and enforceable initiative designed to reduce the volume of stormwater runoff and to prevent the inappropriate construction practices upstream and down that are the cause of the stormwater and flood damages problem. Detention basins are by design only meant to focus on the peak rate part of the flooding problem, but they don’t address the true cause of flooding and flood damages which are the inappropriate construction and stormwater practices that are the source of increasing polluted runoff volume, and the inappropriate development practices that actually put structures in the path of harm where they are assured present, future and growing flood damages. And in fact, because detention basins take no action to diminish increasing stormwater volumes, and discharge the increased volume of water directly into the creek, at a greater volume over a longer period of time than the stream can handle they can actually exacerbate flooding and flood damages, including harm to structures, increasing erosion, and increased pollution problems.

Given these realities, the Delaware Riverkeeper Network has questions and concerns about using a detention based approach that does not address the source of the runoff in any way – it is a proposal that is simply going to detain runoff, discharge it directly to the creek where it will continue to contribute to downstream problems and will allow the upstream stormwater and inappropriate development problems to persist and perhaps get worse with future harmful decisions. If the School District were going to agree to the taking of its field for this detention based system it should insist that the Township also commit to, and fund, in an enforceable way, accompanying actions to reduce the volume of stormwater runoff that is causing the problem and to stop any future decisions that increase future volume of runoff.

It is also important that the agreed upon project recognize and include a plan to address downstream contributions to the problem – e.g. a program to address downstream land use practices that also contribute to community harms including the lawns and streamside land uses that allow increased erosion, flooding, stormwater runoff and pollution to get worse; as well as positive measures such as a 100 foot buffer creation program along all publicly owned downstream parcels and a support and incentive program to create downstream riparian buffers in recognition of the flood damage reduction, pollution, flood and stormwater benefits they provide.

It is very important that the additional upstream and downstream measures be committed to in an enforceable way. You might recall that when the Township selected construction of a new underground infiltration system at the Radnor Middle School that it agreed to include as part of the project actions demanded by the Radnor community that it would also implement upstream actions that would reduce the volume of runoff that flows to the Radnor Middle School site. This volume reduction element of the project was demanded by members of the community and was made in

response to the reality and recognition that the RMS infiltration system could never be designed to handle the full volume of runoff that reaches the site. The volume-reduction elements of the project were never implemented.

In a write up about the project it says the detention basin will provide “a small measure of water quality”; why can the Township not do better than this for the level of investment they are planning on?

What infiltration options have been considered for the site and/or beyond – infiltration would handle volume, peak and quality issues and are the best option for reducing downstream flooding harms to structures as well as public and private lands; and for improving downstream ecological systems. The array of alternatives considered, and the quality and quantity of benefits they provide should all be put forth for School District and community consideration as part of the decisionmaking process.

I hope you will find these questions and concerns helpful as you are approached by the Township regarding the North Wayne Detention Basin.

Respectfully,



Maya K. van Rossum
the Delaware Riverkeeper