Testimony, Fred Stine, Citizen Action Coordinator, Delaware Riverkeeper Network
September 11, 2017

Regarding: Resolution #207-100 – Awarding the Contract for Professional Design Services for the Cleaning, Repairing, and Sediment Reduction BMP at the North Wayne Field Park Basin

The Delaware Riverkeeper Network has reviewed the following documents and presentations:

- Radnor Township Memorandum - Presentation and Possible Motion (May 1, 2017)
- Radnor Township Memorandum - Proposed Legislation (August 6, 2017)
- Radnor Township Board of Commissioner May 22, 2017 agenda (http://www.radnor.com/AgendaCenter/ViewFile/Agenda/_05222017-1264)
- Radnor Township Board of Commissioner May 22, 2017 meeting (https://www.youtube.com/watch?v=vioToCA8Kdk Go to the 3:42:17 mark)

Based upon the review of this information, the Delaware Riverkeeper Network conditionally supports the cleaning and repair of the North Wayne Field Park Basin. The conditions include:

1. The scope of work being proposed and implemented is strictly just for the removal and proper disposal of the accumulated sediment contained in the basin
2. That the “repair of the 20 foot +/- section” of existing pipe is limited to just replacement of the damaged section and that no new sections that would expand the capacity is added or installed
3. That there is no change made to the size of opening, length, direction of discharge of the basin’s current discharge orifices located in the Type “M” frame and grate
4. Considering the testimony given by CH2M (based on their modeling) that some downstream flooding may be exacerbated with just the cleaning and repairs and no upstream volume reduction, and that the Township’s stated objective is to “ensure that no project will lessen one problem and worsen another,” after cleaning, we support temporarily attaching a metal plate on the basin outlet structure that mimics the current blocked orifices that will, as described by CH2M, contribute to new flooding downstream
5. That volume reduction projects located up-stream of the Basin are given top-priority so the total volume of runoff entering into the basin is reduced as quickly as possible
6. We do not believe that the volume reduction projects identified by CH2M (I-13 and I-3) will provide the greatest cost effective volume reduction, nor will those CH2M-recommended projects provide the water quality benefits necessary to accomplish the Township’s MS4 objectives.

7. We strongly recommend, as a condition of this project approval, that the Township immediately engage in discussions with its MS 4 consultant to identify projects upstream of the Field Basin such as those mentioned in the Township’s Pollution Reduction Plan as those projects will, in a much more cost effective way provide both volume reduction and water quality benefits.

END