



EAST LANCASTER NEIGHBORHOOD ASSOCIATION (ELNA)

January 14, 2020

To: Olivia Gantz, Salem Planning Division
From: Susann Kaltwasser, East Lancaster Neighborhood Association
RE: Subdivision Case No. SUB19-09 at 4560 Center Street NE

After reviewing the proposal for 4560 Center Street NE the main concern is for the proposal that seems to suggest building homes and a street in the designated wetlands. ELNA does not support the replacement or mitigation of any wetlands in this area.

This area has a long history of drainage issues and it is not just because of surface water sitting on hydric soil. There is good evidence that this area is the original headwaters of the East Fork of the Little Pudding River. In the past this area was dotted with a series of lakes and small streams for the main part of the winter and into the spring.

Back in the 1960s Marion County dug drainage channels in the area in order to allow for more farm use. However, this action has only been partially successful. This is in part because there seem to be underground streams that are not always evident. The streams cut through this area and in times of significant rain, they rise to the surface.

During a normal winter the wetlands appear, but although they appear to 'dry up' later, what they actually do is just drop below the surface where they are less evident. Once someone digs down a few feet (and at times just a few inches) you find dampness and at times even flowing water. The evidence of this is the fact that many homes have to have sump pumps in order to remain dry, or control flooding. 1996 this area had a flowing stream that went across Center Street.

While the City might permit a developer to put in some topsoil to mitigate the wetlands, experience shows that the builder must dig down to the original ground level in order to find firm soil on which to build. This will cause standing water to accumulate inside the foundation. So, you can cover it up, but you can't eliminate the water.

We would urge the city to require the applicant get approval from the Division of State Lands to do any building in this area. Also, that they look at creating a plat that avoids building on the designated wetlands areas. Perhaps a detention or drainage system could be used on those lots

that might be required in another location. Lots 16 and 17 and the future access street to the west should not be built in the wetlands.

Knowing the history of the area and by being given notice in this letter, allowing development in this area on known wetlands and with a known history of flooding the City could be open to lawsuits if flooding occurs. We make this statement because in the past the City issued permits for another ELNA area subdivision with such a problem and when two lots flooded repeatedly, the developer claimed the City to be at fault for issuing permits.

Thank you for consideration of our neighborhood concerns.