

August 19, 2020

Honorable William Doyle (via US Mail and email)
Mayor
Saco City Hall
300 Main Street
Saco, ME 04072

Dear Mayor Doyle,

Kinney Shores Association is a homeowners' association representing over 80 homeowners in the Kinney Shores section of Saco (the area between Oceanside Avenue and Seaside Avenue and between Shore Avenue and Outlook Avenue). As an association, we have had reports from Pam Cardin, one of our members who sits on the Shoreline Commission as well as from our Ward 4 Councilor, Lynne Copeland, concerning the status of the Section 111 project of the US Army Corps of Engineers (USACOE) to save and protect Camp Ellis.

While we are sympathetic with the plight of Camp Ellis and its residents in facing historical erosion of its shores and property, we are writing to express our strong opposition to the entering of any Project Partnership Agreement (PPA) by the City of Saco for construction of a 750 foot spur to the jetty and beachfill (Proposal 6) without an examination of what the effects of Proposal 6 would be to the entire shoreline of Saco Bay. Specifically, we would like to see the following holistic approach:

1. An analysis of what this Spur will do to beaches and shoreline to the north of Camp Ellis - notably, Ferry Beach, Bay View, Kinney Shores, Goosefare Brook Estuary, Ocean Park, Old Orchard Beach and Pine Point Beach in Scarborough.
2. An update of the 2009 Economic Analysis to include and determine the economic effect of the potential destruction of beach front property values in Bay View, Ferry Beach and Kinney Shores to the tax base of the City of Saco should the Spur be built and erosion exacerbated in these areas due to the Spur.
3. An update of the Woods Hole Study created in 2004 and its conclusions based upon what we now know to be effects of climate change with increasing severity and frequency of 10 year storms and rising seas. Specifically, will Proposal 6 work? And will the continued beachfill and renourishment on the shores of Camp Ellis continue to bring sand and sediment northward and what will be the environmental and economic effect on these northern beaches and Goosefare Brook estuary?

We will briefly address each of these.

1. We bring to your attention the article by Joseph T. Kelly of the University of Maine entitled *Camp Ellis, Maine : A small beach community with a big problem....its jetty.*¹

It is a thorough and complete history of the building of the jetty by the USACOE as well as a criticism of the studies of the USACOE projects. We believe that the purpose of the Woods Hole Group Study was to “solve the problem” of erosion at Camp Ellis and did not thoroughly examine what the erection of a new structure might do to beaches and properties to the north. As Kelly points out in his article, “there is reasonable concern that the area north of the planned breakwater will erode due to wave refraction around the structure.” (page 16) Also “there is a temporal delay, or time lag, between an action and its impact on either the human or natural systems. Clearly, the long-lasting impact of the jetties represents a legacy effect, although the USACOE denies its significance.” (page 17)

And, most alarmingly, and a potential pre-cursor of what may come:

Although the USACOE believes the breakwaters will “solve” the problems at Camp Ellis, in all likelihood, the overall system, people and beach will each respond on their own Just as Pine Point gained at Camp Ellis’ loss earlier, Camp Ellis’ gain now will likely come at the expense of their neighbors to the north. Wave refraction around the breakwaters could draw sand from the nearby beach into the protected area behind the breakwater, leading to erosion of properties that are in no danger today. It is conceivable that these homeowners will take action themselves some day to request their own breakwaters. (Page 17)

In short, we all know that whenever the USACOE has taken action to build or expand the jetties from the 1880’s until 1969, there has been an temporal effect felt in the entire Saco Bay. We believe the building of any additional structures or spurs will disturb the shoreline on Ferry Beach, Bay View and Kinney Shores as well as properties in the communities to the north.

2. We are in receipt of the Project Report entitled “A Fiscal Impact Analysis of the Saco River & Camp Ellis Beach Shore Damage Mitigation Project” prepared by Planning Decisions, Inc., dated May 3, 2012. We feel it is lacking in several respects:
 - a. The Figure 4 depicting areas of Saco Bay where “No Change” occurs in sand gain or loss is misleading as it is a historical drawing on the effect of the original and jetty improvements in 1969. Until an analysis is done of the wave impact of the new spur and potential damage to beaches between Camp Ellis and Ocean Park, it is impossible to determine the impact on property values to the north.

¹ https://www.researchgate.net/profile/Joseph_Kelley/publication/282724375_Camp_Ellis_Maine_A_small_beach_community_with_a_big_problemits_jetty/links/5b291f12aca27209f315b728/Camp-Ellis-Maine-A-small-beach-community-with-a-big-problemits-jetty.pdf?origin=publication_detail

- b. Without the information on decreased property values to the north in Bay View, Ferry Beach and Kinney Shores, the impact on the City of Saco cannot be accurately measured.
3. Finally, the Final Decision Document, Executive Summary of the US Army Corps of Engineers dated September 2018 succinctly outlines the risks of climate change and rising seas: “Risks with project design and renourishment needs are related to sea level change and storm frequency and intensity. Computer modeling attempted to address this issue and designs for more frequent and greater volume of renourishment actions were developed for intermediate and high level projects of sea level rise. Increases in the spur jetty design dimensions were not considered as corresponding increases in the dimensions of the remaining inshore length of the existing jetty would carry more significant cost.” (page E-12). And later, “these risks are greater with the initial beachfill scaled back to fit the Federal cost limit authorized by WRDA 2007.” The report further notes that there is significant cost to complete the initial beachfill placement and perform the 12-year renourishment cycle or the 4-5 year renourishment cycle. These costs to the City are estimated at \$68,000 per year. Even if the City was able to successfully defer these costs to the federal government, what is the environmental impact of these renourishments on the entire shoreline of Saco Bay?

In conclusion, as residents of Saco and Kinney Shores, we are concerned that another man made structure designed and funded by the USACOE to control erosion of a one area of Saco Bay (Camp Ellis) will have far greater consequences on the rest of Saco Bay. Certainly, the track record of the USACOE in building the jetty vs mother nature isn't a strong one and we are reluctant to let history repeat itself. We are further concerned that this project is proceeding without adequately addressing the effect of the Spur on the shoreline to the north, the possibility of lower properties values and the ensuing effect on the City of Saco, as well as the effects of climate change and risks that the Spur as designed won't work, as the USACOE Executive Report itself states.

We would welcome a discussion of these points.

Sincerely,

Board of the The Kinney Shores Association

The Kinney Shores Association

cc (via email):

Lynn Copeland, Councilor

Marshall Archer, Councilor

Jim Purdy, Councilor

Joseph Gunn, Councilor

Alan Minthorn, Councilor

Jody MacPahil, Councilor

