



CITY OF SACO, MAINE

Administration
Saco City Hall
300 Main Street
Saco, Maine 04072-1538

Kevin L. Sutherland, City Administrator
Telephone: (207) 282-4191 x341
Email: KSutherland@sacomaine.org
Facebook: [/sacomaine](https://www.facebook.com/sacomaine)
Twitter: [@sacomaine](https://twitter.com/sacomaine)

September 14, 2018

William Conde, Colonel
District Engineer
US Army Corps of Engineers
New England District
696 Virginia Road
Concord, MA 01742

Re: Saco River and Camp Ellis Beach, Saco, Maine, Section 111: Shore Damage Mitigation Project

Dear Colonel Conde:

The Saco Bay Erosion Working Group, a collaborative of concerned Saco residents, City Council representation, the Mayor's office, and City staff have reviewed the Final Decision document for the Section 111: Shore Damage Mitigation Project at Camp Ellis in Saco, Maine.

Since the installation of the Camp Ellis Jetty in the late 1800s, the Camp Ellis community has experienced significant erosion. For the past 65 years, the City has cooperatively worked with the Federal Government to mitigate further erosion and future property loss. We have worked closely with the District Office to ensure our concerns are captured within the report and executive summary; however, we have additional points that we would like to review with the ACOE as outlined below.

The City does see the ACOE preferred Option 6 as an immediate erosion mitigation benefit, however, if all future nourishments are the responsibility of the City, our City Council and community cannot support this project.

Below are our responses to the four points outlined on page 15 in the Executive Summary:

1. There are no lands, easements, rights-of-way, or disposal areas that the Corps will require of the City other than easements over City lands for access to the project. The City will execute any easements necessary for project completion.
2. If the City will be responsible for the maintenance of the engineered components of Option 6, that is not feasible on the local level. If the ACOE requires the City to maintain the engineered components of the project, the City requests a partnership of determining that scope and that the performance of this

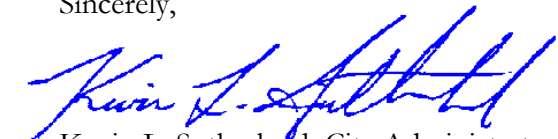
alternative does not make the City of Saco liable should the spur fail with the agreed upon inspection and maintenance.

3. In June of 2018, the Council approved a Beach Management Agreement that could be signed by both parties. On September 4th, the City Council further amended ordinances that needed to be changed to comply with the Beach Management Agreement. Saco will be in compliance with this requirement.
4. The City understands that Federal funding for this project is currently limited by WRDA2007 to \$26.9 million which is the current estimate for the Federally Implementable Plan recommended in the report. The City understands that it would be responsible for any costs above that Federal limit. Since the Federally Implementable Plan will not provide the full cost of the initial design beach fill originally included in Plan 6, the City requests that any cost savings identified during project design or resulting from the contracting/bidding process be applied to increasing the initial sand fill volume, and or towards the Federal 50% share of future nourishment events. The City also intends to continue to work with its Congressional delegation to increase the \$26.9 million Federal funding limit to levels that would permit Federal funding to complete the initial beach fill volume and participate in future nourishment.

Based on additional analysis performed by City staff and supported by the City Council, we believe Option 25A could optimize the allocation of resources and maximize the impact of mitigation. Were the ACOE to restructure the funding allocation of Option 25A, such that the City as the Non-Federal sponsor delivered the beach nourishment portion of the project, Option 25A would then fit within the allocated funding of Section 3085 of the WRDA2007, specifically \$26.9 million allocated to Camp Ellis. We believe that this would reduce the burden of future nourishment costs

The City and its elected officials understand this may delay action for FY19, but we ask that the ACOE consider our Locally Preferred Plan in their decision-making process and work with the City of Saco to find a way to provide the best value option at the lowest cost.

Sincerely,



Kevin L. Sutherland, City Administrator

CC: Mayor Marston Lovell, City of Saco
Senator Angus King, United States Senate
Senator Susan Collins, United States Senate
Representative Chellie Pingree, United States House of Representatives