



City of Milford, Connecticut

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Steven K. Johnson
*Open Space and Natural
Resource Agent*

Parsons Government Center
70 West River Street
Milford, CT 06460

May 13, 2019

Mr. John Rosenthal
State of Connecticut
Department of Housing
505 Hudson Street
Hartford, CT 06106

Dear Mr. Rosenthal,

The City of Milford's Crescent Beach Study, Project # 6206, has conducted an in-depth study of coastal resilience for Crescent Beach and the surrounding area. GEI Consultants, Inc. (GEI) is the lead consulting engineer on this project. GEI Consultants have also partnered with Milone and MacBroom, and the Woods Hole Group for professional services. They have been paid according to their proposal for this study in the amount of \$208,000. They have been continuing to provide consulting services as their budgeted fees allow. This leaves a balance of award funds of \$15,581.20 that were not encumbered for the planning study.

GEI Consultants evaluated a range of possible alternatives to achieve the goal of designing living shoreline concepts together with needed infrastructure for coastal resiliency that enhances protection from the effects of future storm events. The City has held a public information meeting on 5-24-2017 and has continued to update the Borough of Woodmont and residents throughout the project. Project updates are reviewed during monthly meeting so the Milford Flood Erosion and Control Board as well.

GEI has prepared detailed plans proposing a combination of beach nourishment and stormwater drainage that have been submitted to CT DEEP and Army Corp. of Engineers (USACE) for permitting review. GEI and Milone and MacBroom have had extensive discussions with CT DEEP and USACE and submitted applications of the proposed design as attached. The proposed Crescent Beach nourishment and vegetated dune is designed to reduce wave energy and change the wave run-up profile which could help extend the lifespan of the existing seawall / platform that is exposed due to eroded shoreline sand that once protected these structures. The design would also reduce damage to the road infrastructure of Beach Avenue and residential properties. The design also balanced the desire for recreation and public access.

At this time, the permits for this project are still under review.

An on-site meeting took place on 5/9/2019 with representatives from CT DEEP, USACE, National Marine Fisheries (NMFS), Environmental Protection Agency (EPA), the City of Milford, and the Borough of Woodmont. The purpose of the meeting was to review the proposed project design, clarify the key deliverables, and understand the conflicting regulatory criteria that each agency is bound to uphold. The group also reviewed feasible alternatives needed to meet the project goals and discussed some steps that could be taken to forward the permitting under review.

Below are some highlights of the project at this time:

1. Historical photographs and other accounts provided by residents highlight the scenic beauty and protective sand levels that have existed for the past 120 years.
2. An extensive Woodmont shoreline nourishment project was completed in 1959 by USACE that extended 500 feet of beach including Crescent Beach to a width of 100 feet by direct placement of sand. The attached aerial photograph from Milford's Engineering archives was taken in 1963, four years after the USACE nourishment project.
3. Residents understand by first-hand experience the movement of sand by wave action and currents that erode the sand to the east in this vulnerable area.
4. The scenic rocky outcrop and cobble shoreline at Crescent Beach is a challenge for the project design.
 - a. CT DEEP Fisheries is supportive of the proposed plans.
 - b. National Marine Fisheries Service (NMFS) and EPA are advisory to USACE. NMFS will not tolerate a conversion of the rocky habitat to sand because of Essential Fish Habitat concerns. Any sand covering rocky surfaces would probably trigger mitigation that has not been defined.
5. NMFS suggested the use of prefabricated structures and rocky surfaces to help hold the sand in place. These structures have been effective in other states. CT DEEP will authorize living shoreline projects for fostering resilience and habitat enhancement inclusive of beach and dunes however DEEP will not authorize placement of rock or other prefabricated structures for this location at Crescent Beach.
6. Changes to the seawall were not proposed in the design due to the coastal jurisdiction level (CJL) and DEEP regulations.
7. Some residents of Beach Avenue believe their deed references portion of Crescent beach as their property. Others have relinquished any perceived rights to the Borough of Woodmont. None of these properties in the project area have submitted a survey to substantiate their ownership of any land south of Beach Avenue. Before any final permits would be issued, this issue would need to be resolved.

Reviewing agencies present at the meeting 5/9/19 acknowledged the history of this area and explained that they must each regulate to existing regulatory guidance.

GEI and Milone and MacBroom will attempt to provide more concise alternatives analysis to justify the project. They will also update mapping to delineate areas of sand, rock outcrops, and other beach features that have changed over the project study.

The Crescent Beach Study resilience project highlights the complexity of the state and federal agencies with conflicting priorities in the coastal area and how best to enhance resilience.

In a time of higher sea levels, this project area has continued to experience frequent intense storms such as the five nor'easters that impacted Milford last October, November and December of 2018. Achieving the resiliency goals this plan is focused on while enhancing Milford's sense of place as a coastal community with 17 ½ miles of shoreline is a challenge. We will endeavor to seek sustainable solutions.

Sincerely,



Steven Johnson
Acting Assistant Director of Public Works &
Open Space and Natural Resource Agent

Cc: Christopher Saley
Public Works Director

Benjamin G. Blake
Mayor