

Ms. Cynthia A. Jarema
Chief, Operations Office
US Army Corps of Engineers, Detroit District
477 Michigan Avenue
Detroit, MI 48226-2550

March 12, 2021

Dear Ms. Jarema,

Thank you for your letter of March 1, 2021, with the proposed Army Corps Minnesota Point Beach Nourishment Debris Mitigation and Cleanup Plan.

The City appreciates the Corps' response to the inadvertent placement of metal debris on City-owned Park Point Beach in 2020. By accepting responsibility for the problem, the Corps has established a foundation for constructive, solution-oriented dialogue with our residents and between our agencies. The Corps' commitment of skilled staff to devise solutions with and for Duluth has contributed to growing confidence that the situation can be resolved collaboratively.

Duluth hosts more than six million visitors per year, most of whom come between May and October. During that time, visitors and locals alike frequent Park Point beaches. With the COVID-19 pandemic receding, but not yet over, we expect our waterfront to be especially busy this year. A large percentage of Park Point users travel along the beach without shoes and many bring dogs; many users, particularly children, play in the sand, digging and even rolling around in it. The area of the 2020 beach restoration project is among the most popular beaches on Park Point. The City cannot accept the risk of any remaining hazards to people and pets on the beach.

Duluth has reviewed the Corps' written plans to locate and clean up metal debris placed on the beach in the 2020 beach nourishment project, and to avoid inadvertent placement of debris in potential future beach nourishment projects.

The City requires more precision describing the standard of cleanup the Corps will commit to meet as well as the timeline on which the Corps will meet that standard. The City asks that the Corps revise the plan to clarify how the Corps will establish the precise location, density, and extent of the metal debris in and around the 2020 project location, and to commit to remove all debris early in the spring of 2021, no later than Memorial Day.

The City is generally satisfied with the safeguards that the Corps has put in place to avoid inadvertent placement of debris in potential future beach nourishment projects. However, the City will not commit to a new beach nourishment project until the Corps and the City come to an agreement on the standard and timeline for cleanup of the 2020 project.

I have attached the formal recommendations of the Park Point Community Club for the cleanup of the 2020 project and for future projects. Please affirm that the Corps plan satisfies or aligns with the Club's recommendations and revise the Corps plan to make the alignment between the documents explicit.

Finally, we ask that you attach a summary of the protocols that the Corps and MPCA normally follow, and will continue to follow, to sample and test dredge materials prior to placement on the beach. Please include a reference to these protocols in your plan and an explicit note that the Corps will implement these protocols prior to placement.

We thank you again for your collaboration with, and service to, Duluth. Please do not hesitate to call me to discuss any questions or concerns you may have about this letter.

Sincerely Yours,

Jim Filby Williams

Director, Property, Parks, and Libraries Department

218-340-0791

CC: Melissa Bosman
Emily Larson
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