



**Jim Filby Williams**  
*Department of Property, Parks, and Libraries Director*

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Bridget Rohn  
Project Manager  
USACE Detroit District  
477 Michigan Ave  
Detroit, MI 48226

June 16, 2025

Dear Ms. Rohn:

The City of Duluth thanks USACE for its openness and inclusiveness throughout the ongoing Section 111 study on Minnesota Point. In preparation for our review of the Section 111 Study Report, the City kindly requests additional information concerning the methodologies and established guidelines employed by the Corps in quantifying the culpability of the federal navigational structures for chronic severe beach loss on Minnesota Point. As the Local Government Sponsor for the current Section 111 study, we feel it is within our purview to request of the Corps a reasonable level of detailed information relating to the internal workings of the culpability calculations.

Specifically, we seek documentation related to the following topics:

1. Timespan of culpability: It is our understanding that USACE responsibility for perturbations to Minnesota Point's sediment budget spans the entire duration of Federal ownership of the structures (breakwaters) at the Duluth and Superior entries. While the precise dates of Federal ownership are uncertain, operationally, the timeframe of USACE culpability would seem to exceed a century. Is our understanding correct?
2. Determination of the 'control volumes' for sediment-budget calculations: Previous Section 111 studies of Minnesota Point identified a pair of erosional 'zones' downdrift of the Federal structures. Will the current study use these zones as control volumes for budgeting? If not, what guidelines will the Corps employ to determine appropriate control volumes in the current study? The multiple sources and pathways of sediment influx / efflux to the study area make this issue particularly important on Minnesota Point.
3. History of beach nourishment: In the past century, the Corps supplied significant volumes of sediment (dredge spoils) to the lake side of Minnesota Point. Relative to 'native' sediment cover on Minnesota Point, these harbor-derived sediments differ substantially in grain size and associated mobility and, arguably, should not be considered fungible. In computing sediment budgets, how—if at all—will these non-fungible sediments be discounted relative to native sediments? And, again, do Corps guidelines exist for budget calculations involving nourished sediments of substantially different caliber?
4. Natural 'background' sediment loss: The post-glacial history of the study area makes Minnesota Point the ultimate sink for coarse-grained sediment delivered to the nearshore environment in the far western arm of Lake Superior. To the best of our knowledge, there is no compelling evidence for any significant loss of sediment from the barrier, e.g. via

[www.duluthmn.gov](http://www.duluthmn.gov)

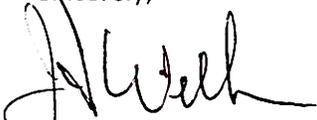
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offshore transport to deep water. In computing sediment budgets within the study area, how specifically is the approximately 3 mm/year of uniform lake-level rise addressed? Do USACE guidelines exist for treatment of this long-term (geologic) process?

5. Treatment of uncertainty in sediment-budget calculations: Prediction of sediment transport rates is notoriously challenging, with order-of-magnitude uncertainties not uncommon. What methodologies and guidelines are used by the Corps to incorporate large uncertainties in terms that enter calculations of the absolute sediment budget for a control volume but then are used to generate a relative (linear, percent scale) culpability?

The City recognizes that our request may be onerous and arrives at a challenging time for Federal agencies. It is the City's sincere hope that the clarity provided by the requested information will streamline the City's review of the study and, ultimately, assist the Corps in producing a high-quality, defensible report that will be better understood and accepted by the Duluth community we exist to serve. We thank you for consideration of our request.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jim Filby-Williams', written in a cursive style.

Jim Filby-Williams, Director  
Property, Parks, and Libraries Department