



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

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Bridget Rohn
Project Manager
US Army Corps of Engineers Detroit District
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Detroit, MI 48226
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Dear Ms. Rohn:

The City of Duluth thanks the Army Corps for your continued transparency and inclusiveness in our work together on the Section 111 study of Minnesota Point. The July 1 call between our teams cast helpful light on some important questions. We are grateful for your thoughtful attention to our concerns.

The significant City concern that remains unresolved is the way in which the Army Corps intends to utilize the sediment budget derived from the associated H&H study to assign and quantify culpability. Specifically, it is unclear to us how these culpability calculations address the role of long-term lake-level rise, or subsidence, resulting from differential post-glacial rebound and, to a lesser extent, eolian transport. It is our understanding that the Army Corps may be treating these natural processes as 'losses' in the sediment-budget calculation, thereby potentially reducing the Corps' culpability. We maintain that unless the Army Corps can demonstrate that the Federal structures somehow perturbed these background (ambient) processes, they should not enter culpability calculations in a manner that reduces Corps culpability.

We recognize that our understanding of the Corps approach may be incorrect or incomplete, perhaps suffering from 'losses in translation' during phone conversation. In the attached narrative, we assembled a series of high-level questions and thought problems designed to demonstrate our current understanding of the Corps methodology and, in doing so, provide an opportunity for corrections or additional insight from the Corps. We kindly request that USACE review the following narrative and provide the City with a reasonably detailed written explanation of any flaws in our understanding of culpability calculations.

Please note that our friend and project partner, John Swenson, was injured earlier this week in a bike accident and will be temporarily unavailable while he recovers. In his absence, please direct your responses to this letter and attached memo to me and Natural Resource Coordinator, Kate Kubiak.

Sincerely,

Jim Filby Williams, Property, Parks, and Libraries Director
City of Duluth

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