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June 30, 2014

Mr. Dwayne Johnson
Regulatory Branch, CESWG-PE-RB
U.S. Army Corps of Engineers
P.O. Box 1229
Galveston, Texas 77553-1229

Re: SWG-2012-01007 (Memorial Park Demonstration Project)

Dear Mr. Johnson:

We write this letter to urge denial of the permit application referenced above.

Preservation Texas included the site of the Memorial Park Demonstration Project on our 2014 Texas' Most Endangered Places list. The scope of the project far exceeds the limited erosion problem this particular stretch of Buffalo Bayou faces. The project should be narrowed to address only portions of the Bayou that are actively eroding and in a manner that does not destroy significant vegetation, rock outcroppings, potential archaeological sites and otherwise alters the slowly, naturally evolving course of the historic waterway by cutting and filling.

A recent 14-mile paddle down the Bayou reveals that most of the erosion in the project area has been caused by the removal of trees. Coupled with increased water volumes caused by overdevelopment of areas in the Bayou's watershed, it becomes clear that the challenges of the Bayou extend beyond the waterway itself. A radical grading and replanting project does not address root causes.

The cultural resource report included in the applicant's submittal is flawed in that it is premised on a project that will involve "minimal changes in the channel and stream flow [that] will not significantly alter the landscape, appearance or feel of the surrounding area." To the contrary, this project will radically alter the landscape, appearance and feel of the surrounding area to take on the character of a landscaped drainage ditch. Scattered shovel tests along the water's edge are completely insufficient to demonstrate that the complete removal of the banks will not have a permanent, negative impact on historic and cultural resources.

The proposed project will irrevocably alter the historic and natural features that exist in this stretch of Buffalo Bayou. Sites associated with Camp Logan and the natural environment of the Hogg Bird Sanctuary should be protected through a project more limited in scope. This is not a place to demonstrate whether or not an unproven, engineered solution will work. It is a place to demonstrate how limited erosion control projects can be accomplished while preserving the historic and natural assets of what is an amazing public resource in the city of Houston.

Sincerely,

Charlene Orr
President

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preservationtexas.org