



September 17, 2004

Mr. Michael S. Marcotte, P.E., Director
Public Works and Engineering
City of Houston
611 Walker, 25th Floor
Houston, Texas 77002

Re: Association Comments on Proposed Revisions
Chapter 9, Storm Water Design Requirements

Dear Mr. Marcotte:

The West Houston Association has received a copy of the proposed changes that the City of Houston is planning to issue regarding Chapter 9, Storm Water Design Requirements, City of Houston, Department of Public Works and Engineering, Infrastructure Design Manual.

The Association is opposed to the Chapter 9 requirements as currently drafted. We offer the following comments in that regard and request a meeting with you to discuss the proposed changes before they are issued on October 1. We will also be willing to meet with you on an ongoing basis to help assure coordination of changes to Chapter 9 with the development and engineering community.

First, we believe the only way to reduce flood damage in the City of Houston is to have an aggressive capital program to rebuild the city drainage systems. While the current capital program of \$50 million per year is a start, it is significantly below the level that will improve drainage and protect structures in substandard city areas. Without a corresponding capital program, the proposed requirements in and of themselves will have no immediate or near term impact on structural damage caused by flooding inside the city.

Second, we believe it is appropriate that the city adopt, within the city limits, the 0.5-acre feet per acre detention requirement in order to bring new development and

redevelopment in the city up to standard. Suburban development outside the city limits has met or exceeded this detention requirement for years. We are unaware of any drainage problems in developments built to current Harris County Flood Control requirements.

Third, all other changes to Chapter 9 should be postponed and reevaluated until a consensus is reached with the engineering and development communities. Development in the ETJ has been built under design standards that far exceed the city's current standard. As a result, drainage in these areas in the ETJ works well without recurring flooding.

We do not believe there is justification for changing these standards and consequently incurring higher costs in the ETJ merely because older inner city areas have been built to lesser standards and flood.

We do not believe that new development in the ETJ built to the current HCFCF standards contributes to flooding problems in the inner city.

We welcome the opportunity to work with you on an ongoing basis to help develop whatever changes are needed to improve drainage in the City of Houston. We will be in contact with your office to set up a meeting to discuss the issues.

Regards,

Roger H. Hord
President & CEO

cc. Honorable Mayor Bill White - City of Houston
Mr. Jack Sakolosky, P.E., City Engineer - City of Houston
WHA Board of Directors