

Draft Proposed Administrative Procedures  
for the New Development and Significant  
Redevelopment Program  
City of Houston

*(See also Procedures and Enforcement Mechanisms Set Forth in the City of Houston's Draft Ordinance.)*

B-1

### City of Houston's Process **3-Between** Inspections

According to the City of Houston's Process 3 Flow Chart, there is an initial construction visit by a city inspector. He completes the SWPPP initial inspection and reviews appropriate features. Then the chart moves to 'Between Inspections' that the contractor is to perform. These are to be periodic. What is periodic? According to #3 above any soil in the streets at any time is a violation. Periodic needs to be defined.

Page 11, Sec. 3.03, (c):

The City and County should provide standard bond forms to be used for SWQ Permits. These should be the same form, and should be vetted with local surety companies which serve the development and construction industry.

Page 18 Section 7.04

Transfer, (a):

The words "if necessary", should be added after the word "and" and before the words "at a minimum".

Section 3.05 Permit Renewal: Should the listed items required for permit renewal (items (a) through (d) also include the "certificate of compliance" referred to in Section 3.06?, or is the "certificate of proper operation"? If they are not the same and three certificates are called for, then this is too many. How about one certificate from with an owner section and an engineer section so as to reduce the paperwork.

Section 3.07 Term of Permits: Delete entire Section and revise. The permit term is 1 year, Harris County and City of Houston construction plan approvals are good for a minimum of 1 year, and therefore construction should not be required to start any sooner than the expiration of the permit, which is one year. At the end of a one year term, the applicant may apply for another one year term, ad infinitum. The County should not limit renewals.

Section 7.03 Recordation: Recordation by plat affecting individual lots or reserves should not be required because it will create unintended consequences at great expense to the public and private sector. Plats are a legal survey document, and cannot be changed except by a very cumbersome and expensive replat process. Notification of future owners is not a sufficient reason to use the plat. Such notification simply states an existing regulation, and by such logic would argue to recite the City Code of Ordinances or all County Regulations. Using a plat as a way to communicate internally within the County or City that a tract requires SWQ construction is not justified either.

Furthermore, a platted reserve may be exempt based on acreage or SWQ controls may be provided in an offsite central facility.

Section 7.04 (b) Transfer: It should not be required that a maintenance entity own the structure controls because this may not allow some otherwise **workage** arrangements. The maintenance entity should have, as a minimum, appropriate easement rights to access and maintenance and repair the SWQ facility.