ONE ALBUQUERQUE planning

Alan Varela, Director

Mayor Timothy M. Keller

December 18, 2025

Ryan J Morrissey P.E.
Burkhardt Engineering
28 N. Cherry St.
Germantown, OH 45327

RE: Goodwill at 6530 McMahon Blvd NW
Erosion and Sediment Control Plan
Engineer's Stamp Date 12/16/25 - A10E002G_BP –(SWQ-2025-00068)

Dear Mr. Morrissey:

Based on the information in your submittal received on 12/17/25, the above-referenced ESC Plan and NOI cannot be approved until the following comments are addressed.

1. The ESC Plan is certified by Ryan Morrissey, a NMPE, but the SWQ Information Sheet and the Contact in ABQ-PLAN is Mitchel Monnin, not a NMPE. Please provide accurate information in ABQ-PLAN when resubmitting the ESC Plan and SWQ information sheet.
2. The silt fence is the only stormwater control specified downgradient from the land disturbing activities. The north edge of the site is downgradient from land-disturbing activities, and the north edge falls more than ten feet from west to east. So, the silt fence there isn't "on contour" as required by the design specifications and good engineering practices, in defiance of CGP 2.1.3 and 9.6.1.c.i and 9.6.1.c.iii. You must *"design and install all stormwater controls in accordance with good engineering practices, including applicable design specifications"* per CGP 2.1.3. The NMED requirements in CGP 9.6.1.c.i state: *"The SWPPP must also describe design specifications, construction specifications, maintenance schedules (including a long-term maintenance plan), criteria for inspections, and expected performance and longevity of these BMPs. For sites greater than 5 acres in size "BMP selection must be made based on the use of appropriate soil loss prediction models or equivalent generally accepted soil loss prediction tools,"* and part 9.6.1.c.iii states: *"All SWPPPs must be prepared in accordance with good engineering practices by qualified (e.g., CPESC certified, engineers with appropriate training) erosion control specialists familiar with the use of soil loss prediction models and design of erosion and sediment control systems based on these models."* Documentation is required on the ESC Plan.

   You must design stormwater controls specific to this site in accordance with standard design specifications and good engineering practice. For example, you may provide design calculations and construction specifications for a temporary Diversion Channel (DC) along the north edge and a temporary Sediment Trap (ST) at this site's discharge point in the northeast corner that demonstrate compliance with CGP 2.2.12. A silt fence may also be required along the north edge for fugitive dust control, but it isn't considered an acceptable stormwater control due to the slope there. The design calculations should be accompanied by a map of the area(s) draining to the Sediment Trap(s). The DC and ST also need to be in the construction sequence.

   The volume of the post-construction SWQ pond is only 7,041 cf, according to the G&D Plan, compared to the 21,240 cf required to serve this 5.9-acre drainage area at a rate of 3,600 cf/acre (drained), as specified by CGP 2.2.12 for a temporary sediment trap. Alternatively, the CGP allows you to use the calculated runoff volume from a 2-year, 24-hour storm, assuming the worst-case watershed conditions during construction. Show all design calculations on the ESC Plan, including pond volume calculations using the conic method and the 100-year hydraulic calculations for each pond overflow.

Construction specifications for an ST should include spot elevations, dimensions for the pond, and typical sections and materials for the spillway. Allow at least 1' freeboard from the required volume to the crest of the overflow spillway. Embankments should be avoided where their failure could cause damage downstream. If used, embankment tops should be at least 1 foot above the 100-year elevation and at least 4 feet wide. Construction specifications for an ST should also include a profile view through the pond, labeling:

A. the pond bottom elevation, area, and volume.
B. the sediment cleanout elevation, area, and volume
C. the elevation and area of the required volume
D. the overflow elevation, area, and volume
E. the 100-year elevation, area, and volume
F. the dam top elevation, area, and volume (if applicable)

3. NMED requires design specifications per CGP 9.6.1.c.i, usually shown on BMP details, but they are absent from the details on this ESC Plan. Add design specifications for each stormwater control on the ESC Plan. Attached are draft city BMP details, including these specifications.

4. Remove the Construction Exit from the low corner of the site in accordance with good engineering practices. The low corner is the muddiest location on the site.

5. Soil information – add a table with name type, particle sizes, and Erodibility factor per CGP 2.1.1. Include soil loss calculations or a description on the ESC Plan per CGP 9.6.1.c.i.

6. The SWPPP must include site-specific interim and permanent stabilization as per CGP 9.6.1.c.i. The landscape plan lacks a legend, and stabilization specifications are missing for most areas outside of Goodwill's lot. Provide stabilization construction specifications for all land disturbance areas. The note about "permanent lawn" on the ESC Plan doesn't include actual construction specifications.

7. Delete the note on the ESC Plan that says: *"This plan is for reference / general erosion control measures only. The contractor is responsible for providing a separate SWPPP plan for the overall development to submit to the city for approval. Refer to the city approved SWPPP plan before starting construction*" since this plan is being submitted for city approval.

8. Add the City Standard ESC Notes attached.

9. Update the engineer's stamp date on all sheets whenever a change is made to any of the sheets.

If you have any questions, contact me at 924-3420 or jhughes@cabq.gov.

Sincerely,
James D. Hughes, P.E., CPESC

James D. Hughes

Principal Engineer, Planning Dept.
Development and Review Services