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January 7, 2020

Mr. James D. Hughes, P.E., Principle Engineer, Planning Department
City of Albuquerque
Hydrology Section Planning Department
PO BOX 1293
Albuquerque, NM 87103

RE: Ascension Subdivision – 8814 Horizon, ESC Plan Response

Dear Mr. Hughes,

E2RC, LLC, received your letter dated December 23, 2019, rejecting approval of a plan our firm designed and implemented. Your letter identified five areas of concern and four ESC Plan Standard Notes.

I provided an email reply to your letter December 23, 2019, and you answered December 30, 2019. This letter sums the responses to each of your correspondences.

The ESC Plan we developed meet the requirements of the NPDES 2017 Construction General Permit (CGP). The City of Albuquerque (COA) ordinance uses the CGP as its basis. The COA ordinance does not add stringency to the execution of the CGP and by Federal rule it cannot be more restrictive. The COA regulation is not more restrictive.

Specifically, we provide support for our work:

1. The RUSLE2 Analysis for the project is in the SWPPP supporting documentation portion of the design. The site map and the supporting documentation are the entire SWPPP. Reviewing either independently of the other won't meet what we are required to deliver as the CGP describes.

    a. The RUSLE2 Analysis for the project is an enclosure to this letter.

        i. The analysis demonstrates the sediment delivery values for the project meet the requirements of the CGP.

        ii. The Disturbed Condition with Temporary Controls, silt fence in this case, demonstrate compliance with the CGP. The sediment delivery value of this condition matches the pre-construction, undisturbed condition and it is less than both initial disturbance and the construction without controls condition as we are required to demonstrate.

    b. Sediment basins are not required based on the RUSLE2 analysis. We note CGP 2.2.12, "If you install a sediment basin or similar impoundment:', is specific to the requirement should this method be chosen as

a Best Management Practice. Section 2.2.3 of the Section is the appropriate requirement to apply for the site specifically. Our design has complied.

2. The basin that abuts the project is contained within the perimeter control.

    a. The basin is a primary control in this instance with the perimeter silt fence acting as a redundant control similar to the recommended practice in Appendix G of the CGP.

        i. The rain event required to fill the pond and create upset of the silt fence is greater than the 0.25" rain event that triggers the inspection requirement to assess the viability of the controls utilized in the design.

        ii. As you note in your reply, the two-year value for pond design is 0.16". This value is less than the 0.25" CGP event. The RUSLE2 analysis accounts for these conditions and demonstrates the perimeter silt fence without sediment traps is sufficient.

        iii. The NOAA value for the two year, 24-hour event is 1.23" based on the PDS information in the design. This is additional support for the RUSLE2 calculation we have performed where silt fence is the control mechanism to prevent sediment transport from the site.

3. The requirement for track out prevention includes housekeeping activities.

    a. Sweeping is an acceptable BMP to work in concert with a rock pad or manufactured device.

    b. The SWPPP documentation includes a sweeping log for the operators to note when it occurs.

    c. We note the photo provided to us from the COA inspection shows sediment staining/shading. Shading is not a CGP violation per 2.2.4, note 18.

4. The RUSLE2 analysis is an enclosure and discussed in preceding items.

5. The hatched area represents stabilized soil per the fugitive dust requirements for COA. Sediment control using this BMP is acceptable prior to vertical construction which is scheduled immediately following completion of the site development work. We will revise the legend to reflect soil stabilization.

    a. Note the drop inlet protection that is in place as a control for the vertical construction phase.

    b. Asphalt Paving and concrete sidewalks are a final stabilization mechanism working in concert with the inlet protection and soil stabilizer.

    c. Vertical construction will serve as the final stabilizing mechanism with associated lot landscaping per the builder's standard.

6. We are very appreciative of your suggestion to provide input to the 2012 BMP Manual. We find the COA and its personnel encourage this frequently and often are the only agency who does encourage industry participation. Please advise how we start that process and we will participate!

7. Inspection Reports are attached. We will add you and Tim Sims to the email list to receive this information.

8. The site map is being updated to reflect controls relocated for better implementation and site protection. I will provide that information separately when it is complete.

We believe it is possible to approve the plan as submitted with the foregoing and with the attachments. Please advise if additional items are needed.

Sincerely,

Kelley V. Fetter, P.E. CPSWQ, CPMSM
President

Cc: Gamma Development

Encl.: RUSLE2, Comply26 Inspection Reports