



Alan Varela, Director

March 4, 2024

Raymond Smith PE  
Souder Miller and Associates  
5454 Venice Ave NE, Suite D  
Albuquerque, NM 87113



Mayor Timothy M. Keller

**Re: Venice Volleyball Courts at 5801 Venice Ave NE  
Erosion and Sediment Control Plan  
Engineer's Stamp Date 2/5/24 (B18E022)**

Mr. Smith,

Based on the information in your submittal received on 2/27/24, the above-referenced ESC Plan can't be approved until the following comments are addressed.

1. The NOI documentation is a Low Erosivity Waiver (LEW). It is not advisable to proceed without an NOI and CGP coverage because it seems unlikely that all aspects of construction and stabilization will be completed in the time frame that would qualify for a LEW,  $R < 5$ . If you insist on using a LEW, be advised that substantial penalties will be assessed for every day that construction continues without CGP coverage beyond the project completion date on the LEW. If you insist on proceeding with construction with a LEW instead of CGP coverage, then you must submit a completed ESC Permit form and the R-value calculation used for the LEW.
2. The property owner information, "Venice Capitol, LLC," as shown on the SWQ Information Sheet, does not agree with the available Bernalillo County records, which show "Verde Management, LLC" as the property owner. Property rights may have changed hands recently; if so, please provide documentation in the form of a recorded deed or lease. The accurate name and contact information for the entity in control of the property rights is required on the Information Sheet, the NPDES documentation, the SWPPP, and the ESC Plan.
3. The person who signs the certification statement at the end of the NOI must be a "responsible corporate officer" as defined at CGP G.11.1. Provide documentation in the form of articles of incorporation, bylaws, or board meeting minutes that the officer signing the NOI or that is listed as the Property owner on the ESC Permit Form satisfies the requirements of the CGP. The officer may delegate his signatory authority to another member of the corporation in accordance with CGP G.11.1.2 for the purpose of signing the remaining documents in the SWPPP and the required reports.
4. The complete contact information for the property owner is required on the SWQ Info Sheet, including a working phone number. The phone number is missing. The same information is required on an NOI or an ESC Permit Form if the EPA documentation is a LEW.



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5. Mulch socks and/or fiber rolls are inappropriate controls for concentrated flows. Control stormwater discharges to minimize channel erosion and scour in the immediate vicinity of discharge points per CGP 2.2.11. Provide permanent velocity dissipation devices (e.g., rip-rap or rock check dams) within and along the length of the dirt channel next to Venice Ave. to slow down stormwater.
6. Note 8 in the Silt Fence Notes contradicts CGP 2.2.3.c.i and must be changed to agree.
7. The SWPPP must include site-specific interim and permanent stabilization specifications per CGP 9.6.1.c.i. The Landscape Plan can be used to satisfy this requirement and should be submitted separate from the ESC Plan with the application to the Stormwater Quality Section of the Planning Department and it should be included in the SWPPP. Provide a specification on the ESC Plan for any disturbed areas not covered by the Landscape Plan sheets.
8. Update the engineer's stamp date each time the plan changes.

If you have any questions, contact me at 924-3420 or [jhughes@cabq.gov](mailto:jhughes@cabq.gov).

Sincerely,

*James D. Hughes*

James D. Hughes, P.E. CPESC.  
Principal Engineer, Planning Dept.  
Development and Review Services



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