



Alan Varela, Director

Mayor Timothy M. Keller

December 11, 2025

Andrea Rand
ISG Inc.
7100 International Dr, Ste 5550
Minneapolis, MN 55425

**Re: U-Haul at 8200 Jefferson St. NE
Erosion and Sediment Control Plan – C17E146 – (SWQ-2025-00051)
Engineer’s Stamp Date: 12/3/25**

Ms. Rand,

Based on the information in your submittal received on 12/3/25, the ESC Plan and Notice of Intent (NOI) cannot be approved until the following comments are addressed. This is the first look at an ESC Plan since it was missing from the first submittal. The ESC Plan required by the City consists of all the Storm Water Pollution Prevention Plan (SWPPP) Map requirements from the EPA’s Construction General Permit (CGP) Part 7.2.4. Additional items from the SWPPP are required on the ESC Plan by the city’s checklist sent with the first comment letter.

1. The NOI still shows an estimate of 8.75 acres disturbed, while the area of this project, including the 9.17-acre tract plus the adjacent landscape buffers and sidewalks, comes to 9.75 acres. Also, the start and end dates are off by at least one year. Please correct the area and dates on the NOI and every other place where that information is incorrect.
2. The cover page, Sheet C0-10, includes Site Data that doesn’t pertain to the Erosion and Sediment Control (ESC) Plan except that it has a vicinity map and a sheet index. Street names must be added to the vicinity map. The index lists four sheets pertaining to the SWPPP, but the SWPPP Notes, sheet C1-10, are missing from the plan set and may contain information required on the ESC Plan. The extraneous sheets must be removed from the ESC Plan index. The ESC Plan isn’t part of the Building Permit plan set; it is a separate, standalone plan that must be kept with the SWPPP during construction. The sheets should be numbered sequentially, for example: for a three-page set of plans, they would be numbered 1 of 3, 2 of 3, and 3 of 3.
3. The BMP details on the SWPPP Details, sheet C1-20, are substandard because they are missing the design specifications, maintenance schedules, and criteria for inspections as required by CGP 9.4.1.c.i. You must *“design and install all stormwater controls in accordance with good engineering practices, including applicable design specifications”* per CGP 2.1.3. Please replace the BMP details in the ESC Plan with standard details that include design specifications, construction specifications, maintenance schedules, and inspection criteria.

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4. Sheets C1-30 and C1-40 have a note at the bottom of the ESC Plan Check List that says, *“sediment basin: drainage basin shall provide the calculated volume of 3,600 cf per acre of drainage area. 8.54 ac drainage area and requires 30,744 cf (31,724 cf provided in northwest detention basin).”* The post-construction pond probably has the temporary volume required for the worst-case scenario during construction, but the calculations are inaccurate and incomplete. A temporary conveyance system must also be designed because most of the site doesn’t naturally drain to the pond. The NMED requirements in CGP 9.6.1.c.i state: *“The SWPPP must identify and document the rationale for selecting these BMPs and/or other controls. 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. Include soil information – add a table with name type, particle sizes, and Erodibility factor per CGP 2.1.1. Also identify and document the rationale for selecting these BMPs and/or other controls per CGP 9.6.1.c.i. Add a narrative description and soil-loss calculations to the ESC Plan.
5. The stormwater controls are inadequate. Silt Fences (SF) on sheets C1-30 and C1-40 are not effective stormwater controls for the large drainage areas and concentrated flows on this site, although they are still necessary for fugitive dust control. Diversion Channels (DC) and Sediment Traps (ST) are required along the west edge of the area of land disturbing activity and must be included with the stormwater controls installed as the initial construction items. The Construction Exit (CE) on the west side of the site conflicts with the need for a Diversion Channel (DC) on the same side to direct stormwater to the large ST in the northwest corner. Therefore, the CE should be removed from the ESC Plan, and design calculations for the DC and ST must be added to the plan. Consider installing an interim DC along the low side of the new storm drains as the first step in construction to control stormwater until the storm drains are built. Also, consider adding a retaining wall at the west property line next to the new building as support for a DC. Include a cross-section of the DC on the west side of the building. The ESC Plan must specify how and when stormwater will be directed into the ST(s). Additional STs may be required. Follow the design specifications and ESC Plan requirements outlined in the attached draft DC and ST details or equivalent details.



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6. The ESC Plan must include a description of the nature and extent of construction activities (CGP 7.2.3.), including a) the nature of construction activities, b) the size of the property, c) the size of the disturbed area, d) a description of construction support activities, e) the size of the maximum disturbed area, and f) the project schedule starting with the initial establishment of the BMPs, posting of permit coverage, and any demolition covered by the permit, through final stabilization, removal of BMPs, and filing NOT.
7. The SWPPP must include site-specific interim and permanent stabilization 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 should be included in the SWPPP. Provide a specification on the ESC Plan for any disturbed areas not covered by the Landscape Plan and specify a "Landscape Buffer Swale" between the sidewalk and curb, per COA DWG 2414."
8. Include the ESC Plan Standard Notes (attached) on the ESC Plan. City Standard ESC Notes are attached.
9. Update the engineer's stamp date on all sheets whenever a plan changes on any sheet to reflect the engineer's review of the impact across all sheets.

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

Sincerely,

James D. Hughes

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