

**Re: Lexus of Albuquerque at 8421 Pan American Freeway
Erosion and Sediment Control Plan
Engineer's Stamp Date 2/21/2023 (F17E078)**

AYER DESIGN GROUP RESPONSES IN (RED)

Mr. Ayer,

Based upon the information provided in your submittal received 2/22/2023, the above referenced ESC Plan cannot be approved until the following comments are addressed:

1. The owner information shown on the Information Sheet (Group 1 Realty, Inc.) and the NPDES documentation (Group 1 Automotive Inc.), form does not agree with the available Bernalillo County records (Pan American Holdings, LLC). The partially signed lease also shows Group 1 Realty Inc. instead of Group 1 Automotive, Inc. as shown on the NOI. The phone number for the point of contact shows the wrong area code, and the voice mail of Brad Johnston is full. The accurate name and contact information for the entity in control of the plans, specifications, and contracts is required.
Group 1 Realty leases the site and has full landlord consent, and is under the umbrella of Group 1 Automotive who operates the Lexus of Albuquerque dealership. The NOI has been updated to show the correct area code on the contact number. Brad Johnson is the Director of Construction for Group 1 Automotive and will be the entity in control.
2. Identify locations of concentrated flow paths that enter and exit the disturbed areas. Identify locations where sheet flow enters and exits the disturbed area. Show on-site drainage patterns of stormwater before and after major grading activities. (CGP 7.2.4.f)
There are no concentrated flows that enter the disturbed areas. The site generally drains to the west and out of the site to a curb flume which drains to the R/W of Pan American Freeway.
3. This site is within 100 yards of the North Diversion channel which discharges to the Rio Grande. BMPs on site need to adhere more closely to the EPA's required controls in CGP 2.2 and the attached design guide for Silt Fences. Silt fence isn't appropriate for concentrated flows.
Plans revised to show additional silt fencing along the western boundary of the disturbed area and additional silt fence along the R/W curb flume. Also, additional silt fence has been added to the top of the existing ramp area along the northwest portion of the site. The front swale, conveyance area along the R/W will be immediately stabilized with larger stone and wire enclosed rip rap to address erosion control within this area.
4. Best Management Practices note #3 public notice must be revised to accurately state the posting requirements of CGP 1.5. "You must post a sign or other notice of your permit coverage at a safe, publicly accessible location in close proximity to the construction site. The notice must be located so it is visible from the public road that is nearest to the active part of the construction site, and it must use a font large enough to be readily viewed from a public right-of-way."
Best Management Practices note #3 has been revised to state the above language.
5. Best Management Practices note #4, please add that the SWPPP must be kept up-to-date per CGP 7.1.
Best Management Practices note #4 revised to add above language and added this statement, "The location of the limits of disturbance and the corresponding BMPs needs to be planned ahead of time and shown accurately on the SWPPP maps for each phase. The staging area should be included inside the silt fence during each phase."

5. Best Management Practices note #14 conflicts with Erosion Control Note #10 regarding the frequency of inspections (14 days is acceptable) and both are wrong regarding the depth of rain that triggers the need for additional inspection (0.5" should be 0.25").
Best Management Practices note #14 and EC Note #3 revised to show 14 day frequency of inspection and depth of rain that the need for additional inspection is revised to .25".
6. The SWPPP must include site-specific interim and permanent stabilization per CGP 9.4.1.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.
The landscape plan has been included in the SWPPP. The only disturbed area not covered by Landscape plan is shown on the ESC plan, front conveyance area where larger stone and wire enclosed rip rap is proposed.
7. Erosion Control Note #6 should say "Where sediment has been tracked-out from your site onto paved roads and sidewalks remove the deposited sediment by the end of the same business day" CGP 2.2.4.d.
Erosion Control Note #6 has been revised to state the above language.
8. Erosion Control Note #10, talking about washout, should be deleted. "Direct wash water from concrete, paint, and stucco into a leak-proof container" per CGP 2.3.4. Identify the locations of the concrete washout.
Erosion Control Note #10 has been revised to state the above language.
9. Update the engineer's stamp date each time the plan is changed.

The engineer's stamp date has been updated for the latest plan revision.

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

Sincerely,

James D. Hughes

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