



Alan Varela, Director

March 1, 2023

Birkie Ayer Jr. PE
Ayer Design Group
215 Johnston St.
Rock Hill SC 29730



Mayor Timothy M. Keller

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

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.
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)
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.
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."
5. Best Management Practices note #4, please add that the SWPPP must be kept up-to-date per CGP 7.1
6. 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").



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7. 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.
8. 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.
9. 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.
10. Update the engineer’s stamp date each time the plan is changed.

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