

CITY OF ALBUQUERQUE

Planning Department
Brennon Williams, Director



Mayor Timothy M. Keller

July 8, 2021

Gaylen Barnett
Eight14 Solutions
5750 Pino Ave NE
Albuquerque, NM 87109

**Re: La Mirada Townhomes
Erosion and Sediment Control Plan
Engineer's Stamp Date: 6/25/2021 (G19E004A)**

Dear Ms. Barnett,

Based upon the information provided in your submittal received (6/29/2021), the above-referenced plan cannot be approved until the following comments are addressed.

1. The ESC Plan can't be approved for Grading, Building Permit, or Work Order until the Grading and Drainage Plan is approved by hydrology for each of those purposes. An individual plan may be provided for each goal. The existing and proposed grades must be shown on the ESC Plan, and they must agree with the Grading Plan approved by Hydrology (CGP7.2.4.b.ii);
2. This plan is part of a larger Common Plan of Development that must be presented to the DRB. Land disturbance and erosion controls in other portions of this site need to be coordinated with the controls on this site. Show a phasing plan for the entire site. The entire 15-acre site drains through this part. The erosion and sediment controls in this part must be sized for the whole area draining to them.
3. Identify the locations of concentrated flow paths that enter and exit the site. Identify locations where sheet flow enters and exits the site.
4. This site is too big for silt fence alone [Stormwater Best Management Practice: Silt Fences: design, installation, maintenance, inspection: April 2012 \(epa.gov\)](https://www.epa.gov/stormwater/best-management-practices). Temporary sediment traps or sediment basins must be located at each stormwater discharge point. Temporary diversion berms should be used to divert drainage into the sediment traps. Silt fences may be used for sheet drainage, provided that the length of the slope is less than 300'. Silt fences must be constructed per the City standard detail with the silt fence embedded 12" into compacted soil and installed on contour with the ends wrapped uphill to pond water behind the silt fence. Wattles may be used where the slope length is less than 50' and must be staked at intervals of 4'.
5. Show the "Limits of Land Disturbing" activities on the ESC Plan for each phase and provide a demolition plan on a map of existing conditions for the entire 15 acres. Identify all of the impervious surfaces to be removed in each phase. Show the existing buildings and storm drains on the Demolition Plan and the ESC Plan. It is

recommended that you leave the existing impervious surfaces in the areas of future development until development is ready to move forward in those areas.

6. Describe the nature and extent of construction activities for each operator (CGP 7.2.2.), including a) nature of construction activities, b) size of the property, c) size of disturbed area, d) description of construction support activities, e) size of maximum disturbed area, and f) Project Schedule. Please include a description of each phase, including g) onsite demolitions of the parking lot and buildings, h) Work Order improvements, i) building construction, j) future development,
7. Phases may need to be shown on different sheets for clarity. It seems that the Demolition of some of the existing buildings will be the first phase of construction, followed shortly by Work Order Plans for the residential subdivision. So consider developing an ESC Plan showing only the work that will be done with each phase and the corresponding erosion controls and construction support activities such as a staging area and stockpile area. And show the rest of the 15-acre site as being “future construction see separate Plan.” Later phases may be processed for approval later.
8. Stabilization measures (CGP 7.2.6.b.vi), including a) **Specific** vegetative and non-vegetative practices, b) deadlines, c) beginning and ending dates of the seasonably dry period, d) procedure to comply with The Weed Removal Ordinance (§ 9-8-1). The landscape plan can be used to satisfy this requirement and should be included in the SWPPP and the ESC Plan submittal, particularly for the common areas in the residential development. Describe **Specific** vegetative and non-vegetative practices to be used in inactive areas of land disturbance.
9. The ESC Plan can’t be approved for Demolition, Grading, Building Permit, or Work Order until the property owner’s NOI has been reviewed and approved by City Stormwater Quality.
10. The owner information shown on the Information Sheet and the ESC Permit does not agree with the available Bernalillo County records. Property rights may have changed hands recently; if so, please provide documentation in the form of a recorded deed or lease. Purchase agreements may also be acceptable. The accurate name and contact information for the entity in control of the property rights is required and should also be shown on the ESC Plan.
11. Soil information – add a table with name type, particle sizes, and Erodibility factor (CGP 2.1.1).
12. Update the engineer’s stamp date each time the plan is changed.
13. Add the City Standard Notes (attached) to the ESC Plan.
14. More concerns may become evident after these concerns are addressed.

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