



Alan Varela, Director

Mayor Timothy M. Keller

October 9, 2024

James Tolman, CPESC
Inspections Plus Inc.
504 El Paraiso Rd. NE Suite B
Albuquerque, NM 87113-1590

**Re: Cactus Patch Plaza at 7801 La Morada Pl.
Erosion and Sediment Control Plan
Engineer's Stamp Date 10/7/24 (H10E034)**

Mr. Tolman,

Based on the information in your submittal received on 10/7/24, the above-referenced ESC Plan can't be approved until the following comments are addressed.

1. The ESC Plan sheets shall measure 22" x 34" per the city drafting standards in DPM Part 4-2(B). The ESC Plan showing the location of the temporary stormwater controls must be at the same scale and size as the approved G&D Plan. Your submittal has a lot of extraneous information that isn't required on the city's ESC Plan Checklist, like the approved Grading Plan, sheet 7. Pages 8-18 of 26 are on 8.5" x 11" sheets. Reduce the number of sheets by combining up to 8 letter-size sheets or 4 tabloid sheets on a single 22" x 34" sheet. Your submittal is half-prepared; finish assembling the sheets. You only need to include construction and maintenance details for the controls on the ESC Plan; like Silt-Fence, Sediment Traps, Construction Exits, Concrete Washout, and inlet protection. Cutback curbs are only used for single-family residential construction, so the detail adds clutter to this ESC plan, making it more difficult to find the pertinent specifications. It isn't a requirement to "minimize the area of disturbance," and no one does it, so all of those notes on pages 8 and 9 are extraneous. Grass-lined drainage swales are never used as a temporary control in Albuquerque. The long-winded discussion on the Silt Fence detail on page 23, including the "Description and Purpose," "Suitable Applications," "Implementation," "Design and Layout," "Costs, and "References," is good in the SWPPP but isn't pertinent to the construction and maintenance details that the city wants to see in the ESC Plan. The discussion of Silt Fence on page 10 is a duplicate of that in the detail on page 23, as is the case for most of the discussion on pages 8-18. The bioretention detail on page 19 is a post-construction detail and doesn't belong on a temporary ESC Plan or in a SWPPP for CGP. You should always include construction and maintenance specifications on a detail sheet in the ESC Plan for the controls that are shown on the ESC Plan and include a few brief notes describing the rest of the pertinent BMPs on the ESC Plan or detail sheet but put the long-winded information in the SWPPP only.
2. Page numbers are missing from 4, 5, 7, 24, and 25.
3. A PE or a CPESC must stamp, sign, and date each sheet. Update the stamp date on all sheets in the ESC Plan each time a change is made to one or more. The date is missing from pages 5, 6, and 8.
4. The ponds on the ESC Plan page 5 are all retention ponds (without an outlet), so the description as a detention pond on sheets 6, 8, 13, and 18, is inaccurate and must be revised to a retention pond or Sediment Trap. A Sediment Trap detail with construction and maintenance specifications as required. It must withdraw excess runoff from the surface in strict compliance with CGP 2.2.12.

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5. The lettering on the Cutback Curb detail on sheet 19 is too small (0.037" tall) and isn't legible. The description of how to maintain the Cutback Curb on page 9 calls for removing sediment when it is filled to less than 2", and the Cutback Curb detail on sheet 19 doesn't show the slope away from the curb to a depth of 6" to 10" at a distance of 10' behind the curb as shown on the city standard detail (attached). Both pages should be revised to agree with the city's detail and the cleanout elevation should be at half of the specified depth 10' behind the curb. You could delete all references to cutback curbs since they aren't being used, but if you include information on them in this ESC Plan or SWPPP, it must not contradict the city's standard detail.
6. The Inactivity Stabilization specifications on page 14 are not "in accordance with good engineering practices, including applicable design specifications," as required by CGP 2.1.2. The minimum specification should be "Native Seed and Hydro-mulch per Albuquerque's Standard Specification 1012." which can be placed on the ESC Plan as a reference without including the whole specification. Specification 1012.3.7.4 calls for "hydro-mulch application with tackifier at the minimum rate of 2,000 lbs. per acre." Unless a credible source is provided, there is no exemption for slopes flatter than 5%. Timing should be as stated in CGP 2.2.14.a & b. Modify page 14 to comply with the CGP 2.1.2.
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 they 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 size of your property, per CGP 7.2.3.b, the total area of disturbance, per CGP 7.2.3.c, and the maximum area to be disturbed at any one time, per GCP 7.2.3.e.

Sincerely,
James D. Hughes, P.E., CPESC

James D. Hughes

Principal Engineer, Planning Dept.
Development and Review Services