



Alan Varela, Director  
Timothy M. Keller



Mayor

February 23, 2024

Kelly Fetter  
E2RC  
439 South Hill Rd.  
Bernalillo NM, 87004

**Re: American Furniture Demo at 3535 Menaul Blvd NE  
Erosion and Sediment Control Plan  
Engineer's Stamp Date 2/6/2024 (H16E083)**

Mr. Fetter,

Based upon the information provided in your submittal received on 2/13/24, the above-referenced ESC Plan cannot be approved for any city permits until the following comments are addressed.

1. The ESC Plan can't be approved until after Hydrology approves the G&D Plan for each specific purpose, Site Plan, Grading Permit, Demo Permit, Work Order, and Building Permit(s). Hydrology has not approved any modifications to the current Site Grading and Drainage Plans. 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. There appears to be more than 5 feet of grade change from the southwest corner of the 18" deep sediment trap to the northeast corner, so more detailed construction standards and specifications will be needed to construct the sediment trap. A berm should be used to divert onsite stormwater runoff from the west side of the site into the sediment trap. A linear retention pond may fit the terrain better than the berm pond combination since the west property line is nearly level over most of its length. The notes on sheets 2 and 9 must be revised to say the pond and berm should be the first items of construction, along with the rest of the temporary stormwater controls. Design finished contours and velocity dissipation devices for the pond and berm per CGP 2.2.12.e.
3. The description of Construction Activities and Project Schedule on sheet 2 appears to be inaccurate and/or incomplete. The tax records indicate this parcel contains a total area of 9.8 acres, including about 2.3 acres of Phoenix Ave and part of the parking lot north of Phoenix Ave. The ESC Plan shows the remaining 7.5 acres south of Phoenix Ave will be subdivided and redeveloped, making this a 7.5-acre "Common Plan of Development or Sale" as defined in Appendix A of the EPA's Construction General



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- Permit (CGP). This ESC Plan is just for demolition and grading activities within a 5.8-acre area of land disturbing activity, excluding three areas north, south, and east of the existing building. The excluded areas south and east of the building may discharge concentrated stormwater to Menaul and Carlisle without stormwater controls. You must add a description and sequence of construction for stormwater controls during demolition and redevelopment in these excluded areas. If these areas are diverted to the sediment trap, additional volume may be required. The "3,600 cubic feet" is "per acre drained," not per acre disturbed, as required by CGP 2.2.12.c.iii. Describe the nature and extent of construction activities (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.
4. Project Schedule/Sequence. The three phases of this project are 1) Grading & Demolition, 2) Infrastructure, and 3) Sales/Building Permits. Provide a brief description of the nature of each phase and identify the need to submit updated ESC Plans to the City for approval prior to the Infrastructure and Sales/Building Permits. Include in the schedule the initial establishment of the sediment trap and berm before the grading phase, the possible removal of the sediment trap and placement of additional silt fence to keep sediment out of the onsite streets after the infrastructure phase, and the maintenance plan of the BMPs and stabilization practices (temporary and permanent) during the sales phase. Also, describe the expected Conditions of Terminating Permit Coverage to comply with CGP 8.2.1, including either a final stabilization specification or sale and transfer to other operators.

If you have any questions, contact me at 924-3420 or [jhughes@cabq.gov](mailto:jhughes@cabq.gov) .

Sincerely,

A handwritten signature in black ink that reads "James D. Hughes".

James D. Hughes, P.E.

Principal Engineer, Planning Dept.  
Development and Review Services