



Alan Varela, Director



Mayor Timothy M. Keller

April 19, 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 4/16/24 (H16E083)**

Mr. Fetter,

Based upon the information provided in your submittal received on 4/16/24, the above-referenced ESC Plan cannot be approved for any city permits until the following comments are addressed.

1. Demolition – Add a note requiring the demolition contractor to *“Provide waste containers (e.g., dumpster, trash receptacle) of sufficient size and number to contain construction and domestic wastes per CGP 2.3.3.e, including demolition debris per footnote #53.*
  - a. *For waste containers with lids, keep waste container lids closed when not in use, and close lids at the end of the business day and during storm events.*
  - b. *For waste containers without lids, provide either*
    - i. *Cover (e.g., a tarp, plastic sheeting, temporary roof) to minimize exposure of wastes to precipitation, or*
    - ii. *a similarly effective means designed to minimize the discharge of pollutants (e.g., secondary containment).*

Additional water quality-based conditions apply per CGP 3.2. Since your site will *“discharge to a water that is impaired for polychlorinated biphenyls (PCBs) and you are engaging in demolition of a structure with at least 10,000 square feet of floor space built or renovated before January 1, 1980, you must:*

- a. *implement controls to minimize the exposure of PCB-containing building materials, including paint, caulk, and pre-1980 fluorescent lighting fixtures, to precipitation and to stormwater; and*
- b. *Ensure that disposal of such materials is performed in compliance with applicable State, Federal, and local laws.”*

*Examples of controls to minimize exposure of PCBs to precipitation and stormwater include separating work areas from non-work areas and selecting appropriate personal protective equipment and tools, constructing a containment area so that all dust or debris generated by the work remains within the protected area, and using tools that minimize dust and heat (<212°F). For additional information, refer to Part 2.3.3 of the CGP Fact Sheet.”*

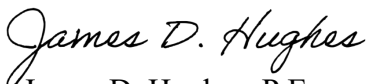
Alan Varela, Director

Mayor Timothy M. Keller

2. Sequence of construction - the CGP 2.1.3 requires you to *“complete installation of stormwater controls by the time each phase of construction activities has begun.*
    - a. *By the time construction activity in any given portion of the site begins, install and make operational any downgradient sediment controls (e.g., buffers, perimeter controls, exit point controls, storm drain inlet protection) that control discharges from the initial site clearing, grading, excavating, and other earth-disturbing activities.*
    - b. *Following the installation of these initial controls, install and make operational all stormwater controls needed to control discharges prior to subsequent earth-disturbing activities.”*
- So, change the sequence of construction notes so that the controls are the first item of construction. The notes on sheets 2, 8, and 9 must be revised to say Ponds 1 & 2 and will be constructed and operated as sediment traps during construction. The Sediment traps and the berm are the first items of construction, along with the rest of the temporary stormwater controls. Describe the nature of construction activities beginning with the initial establishment of the BMPs, posting of permit coverage, and any demolition covered by the permit. Include a description and project schedule per CGP 7.2.3.f through final stabilization, removal of BMPs, and filing NOT.
3. Provide calculations, inspection, and maintenance notes on the ESC Plan to show that the sediment traps will function according to CGP 2.2.12.
  4. Update the engineer’s stamp date each time the plan changes.

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

Sincerely,

A handwritten signature in cursive script that reads "James D. Hughes".

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