



Alan Varela, Director



Mayor Timothy M. Keller

November 15, 2022

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

**Re: Starbucks at 1440 Coors Blvd NW
Erosion and Sediment Control Plan
Engineer's Stamp Date 11/09/2022 (G11E069)**

Dear Mr. Tolman,

Based upon the information provided in your submittal received on 11/15/2022, the above referenced ESC Plan cannot be approved until the following comments are addressed.

1. The ESC Plan can't be approved for Grading or Building Permit until the property owner's NOI has been reviewed and approved by City Stormwater Quality per Albuquerque Code § 14-5-2-11(a). The property owner's NOI is inaccurate and must be corrected. It shows a start date of 11/20/22 and an estimated area to be disturbed of 1 acre. Land disturbing activities began two years ago on 10/4/2020 according to the aerial photo included in NOV#1, and the current area of land disturbance includes the entire 1.5 acre lot.
2. The cover page of the ESC Plan lists only one operator, NCB Construction, Inc. and lists the area to be disturbed as 0.94 acres, which may be the only area that the contractor is responsible for. The City Code § 14-5-2-11 requires an ESC Plan for the property owner who is responsible for the entire 1.5 acres of disturbance. The contractor and owner do not have to share a SWPPP and ESC Plan and may have different areas of responsibility. A plan must be submitted listing the owner as an operator and 1.5 acres as the area of disturbance. The start date needs corrected to 10/4/2020. The permit number is also incorrectly shown as NMR 10040K
3. The limits of disturbance must include all existing areas of land disturbance. Expand the limits to include Phase 2 since it is already disturbed. (CGP7.2.4.b.i);
4. Describe the nature and extent of construction activities (CGP 7.2.3.) including a Project Schedule for ESC controls and inspections in each phase. How and when will Phase 2 be stabilized.
5. Cutback swales are generally not applicable for commercial sites. The perimeter controls need to be silt fence all of the way around the disturbed area to control access and prevent sediment from leaving this site on the east and south sides of the site where sediment in the street has already been a problem.
6. 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



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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.

7. Update the engineer's stamp date on all sheets 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