



**Alan Varela, Director**

December 20, 2024

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



**Mayor Timothy M. Keller**

**Re: Sawmill Building A at 1904 Bellamah Av. NW  
Erosion and Sediment Control Plan  
Engineer's Stamp Date 12/4/24 (J13E044A)**

Mr. Tolman,

Based on the information in your submittal received on 12/12/24, the above-referenced ESC Plan can't be approved until the following comments are addressed.

1. According to Bernalillo County records, Sawmill Bellamah Properties, LLC owns this property. and that is the name of the operator on the NOI with NPDES ID # NMR1006WJ, certified by Jim Long. Property rights may have changed hands recently, if so, please provide documentation in the form of a recorded deed or lease. The accurate name and contact information for the entity in control of the property rights is required on the Information Sheet, the NPDES documentation, the SWPPP, and the ESC Plan.
2. The person who signs the certification statement at the end of the NOI must be a "responsible corporate officer" per CGP G.11.1. Provide documentation in the form of the Operating Agreement (AKA Certificate of Formation or Certificate of Organization) for Sawmill Bellamah Properties, LLC showing that the officer signing the NOI satisfies the requirements of the CGP. The officer may delegate his signatory authority to another member of the corporation in accordance with CGP G.11.1.2 for the purpose of signing the remaining documents in the SWPPP and the required reports.
3. According to the G&D Plan, this is a 1.58-acre part of an existing 3.9ac site, and it has two buildings on it, each larger than 10,000 SF. Identify all of these facts in the description of the nature and extent of construction activities per CGP 7.2.3, 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. The Nature of Construction Activities on Sheet 3 of 9 describes Cactus Patch Plaza 3.5 miles northwest of this site.
4. The demolition of the existing structures is a part of this 3.9-acre "Common Plan of Development or Sale" (CPDOS), so provide a demolition plan identifying all structures to be demolished, including buildings, parking lots, sidewalks, and any other structures.
5. 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, including all areas disturbed by the demolition activities.

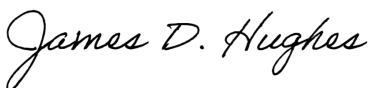
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6. Add a note requiring the demolition contractor to *“Provide waste containers (e.g., dumpster, trash receptacle) of sufficient size and number to contain construction and domestic wastes per CGP 2.3.3.e, including demolition debris per footnote #53.*
  - 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 Cover (e.g., a tarp, plastic sheeting, temporary roof) to minimize exposure of wastes to precipitation or a similarly effective means designed to minimize the discharge of pollutants (e.g., secondary containment).”*
7. Add additional notes and ESC BMPs to comply with CGP 3.2.
  - a. Note - *“Caution: this 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. Select appropriate personal protective equipment and tools that minimize dust and heat (<212°F). For additional information, refer to Part 2.3.3 of the CGP Fact Sheet.”*
  - b. Note - *“Provide documentation in the SWPPP that shows the disposal of such materials is performed in compliance with applicable State, Federal, and local laws.”*
8. Identify controls on the ESC Plan to minimize the exposure of PCB-containing building materials, including paint, caulk, and pre-1980 fluorescent lighting fixtures, to precipitation and stormwater. Separate work areas from non-work areas and construct a containment area so that all dust or debris generated by the work remains within the protected area.
9. The details on sheets 9 of 9 are blurry and are not legible.
10. The title block, CPESC Stamp, Date, and Signature are missing from sheet 4-9. They are required. Update the engineer’s stamp date on all sheets when a change is made to any sheet.

Sincerely,

James D. Hughes, P.E., CPESC

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

Principal Engineer, Planning Dept.  
Development and Review Services