



Alan Varela, Director

March 5, 2024

Cassandra Durkin, CPESC  
BBA Stormwater Services & More, LLC.  
7625 Vista Del Arroyo Ave. NE  
Albuquerque, NM 87109

**Re: NuVue at 1171 Jaffa Rd. NE  
Erosion and Sediment Control Plan  
Engineer's Stamp Date 2/29/24 (L22E011)**



Mayor Timothy M. Keller

Ms. Durkin,

Based upon the information provided in your submittal received on 3/4/24, the above-referenced ESC Plan can't be approved until the following comments are addressed. Generally, the SWPPP (SWPPP maps and ESC Plans) must be prepared in accordance with good engineering practices by qualified (e.g., CPESC-certified, engineers with appropriate training) erosion control specialists per CGP 9.6.1.c.iii. You must implement erosion and sediment controls in accordance with the requirements of CGP 2.2 to minimize the discharge of pollutants in stormwater from construction activities.

1. The SWPPP must describe design specifications, construction specifications, maintenance schedules (including a long-term maintenance plan), criteria for inspections, and expected performance and longevity of these BMPs per CGP 9.6.1.c.i. The construction specifications must be included with the ESC application to the SWQ Section, preferably on one of the sheets in the ESC Plan per the attached ESC Plan Checklist.
2. Since the construction specifications are missing, it isn't clear what is meant by "Stabilized Asphalt Entrance" on the ESC Plan, but it seems unlikely that it will provide the required sediment removal from vehicles prior to their exit from the site onto the paved portion of Jaffa Rd. per as required by CGP 2.2.4.
3. 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.
4. The Limits of Disturbance is not identified on the ESC Plan and must be added per CGP 7.2.4.b.i. It must include all frontage improvements, such as sidewalks and landscaping within the adjacent Right of Way.
5. The person who signs the certification statement at the end of the NOI must be a "responsible corporate officer" of the property owner, "4740 Dillon Drive, LLC," per CGP G.11.1. Provide documentation in the form of articles of incorporation or operating agreement, that the person signing the NOI satisfies the requirements of the CGP. The signatory 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.
6. Update the engineer's stamp date each time the plan changes.

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

Sincerely,

*James D. Hughes*

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