



Alan Varela, Director

September 20, 2024

Mitchell Monnin P.E.
Burkhardt Engineering
28 N. Cherry St.
Germantown, OH 45327



Mayor Timothy M. Keller

**RE: Goodwill at 270 98th St NW
Erosion and Sediment Control Plan
Engineer's Stamp Date 9/13/24 (K09E048E)**

Dear Mr. Monnin:

Based on the information in your submittal received on 9/14/24, the ESC plan cannot be approved until the following comments have been addressed.

1. The ESC Plan can't be approved until after Hydrology approves the G&D Plan for each specific purpose, Site Plan, Grading, Building Permit, and Work Order. The only purpose Hydrology has approved so far is Site Plan. The existing contours along the south boundary of this site do not accurately show the prior grading on this lot by the Avalon Subdivision development. The existing and proposed grades must be accurately shown on the ESC Plan and agree with the Grading Plan approved by Hydrology per CGP7.2.4.b.ii.
2. The Low Erosivity Waiver (LEW) isn't acceptable for this 2.3-acre site because it is part of a "Common Plan of Development or Sale (CPODS) that disturbed more than 5 acres," the 11-acre Avalon Subdivision. Only Small Construction Sites (<5ac) are eligible for a waiver per Appendix C of the EPA's Construction General Permit (CGP).
3. The property owner's name, "GW Bluewater Development, LLC," on the ESC Plan and on the SWQ Information sheet does not agree with the available Bernalillo County records showing that "Goodwill Industries of New Mexico," a nonprofit corporation, is the property owner. The property owner's NOI is required by City Ordinance § 14-5-2-11. Property rights may have changed hands recently, if so, please provide documentation in the form of a recorded deed. The accurate name and contact information for the entity controlling the property rights is required on the Information Sheet, the NPDES documentation, the SWPPP, and the ESC Plan.
4. The property owner's NOI is required by City Ordinance § 14-5-2-11 and was missing from the resubmittal. The Construction General Permit (CGP) Part 1.4.3 established the deadline for filing your NOI is "At least 14 calendar days before the date the transfer to the new operator will take place." According to the special warranty deed, the deadline for filing your NOI was March 20, 2024, 141 days ago.
5. The person who signs the certification statement at the end of the NOI must be a "responsible corporate officer" per CGP G.11.1. Documentation will be required for any officer other than those shown by the Secretary of State. 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.
6. This site's only allowed stormwater discharge location is concentrated flow from the southeast corner. Silt Fence (SF) isn't adequate for concentrated flow, so you must provide diversion berms/swales (DV) along the low edges of the site to direct stormwater into a Sediment Basin (SB) or Sediment Trap (ST) per CGP 2.2.12 in addition to the SF.
 - a. Design the basin or impoundment to provide storage for either:

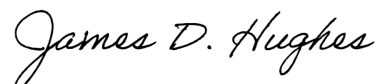
Alan Varela, Director

Mayor Timothy M. Keller

- i. The calculated volume of runoff from a 2-year, 24-hour storm or
 - ii. 3,600 cubic feet per acre drained.
 - b. Utilize outlet structures that withdraw water from the surface of the sediment basin or similar impoundment unless infeasible.
 - c. Use erosion controls and velocity dissipation devices to prevent erosion at inlets and outlets.
 - d. Remove accumulated sediment to maintain at least one-half of the design capacity and conduct all other appropriate maintenance to ensure the basin or impoundment remains in effective operating condition.
- Include the following information for the SB or ST in your resubmittal.
- e. Specific location of the basin, including dimensions.
 - f. Plan view of the storage basin and emergency spillway, showing existing and proposed contours.
 - g. Add a bold note at the pond saying, "the pond may not be removed until the rest of the construction is complete and the site is stabilized."
 - h. Cross section of dam, principal spillway, emergency spillway, and profile of emergency spillway with elevation specifications for each.
 - i. Hydraulic capacity calculations and construction specifications for the principal pipe outlets.
 - j. Runoff calculations, 24-hr volume, and peak flow rate for 2-year, 10-year, and 100-year frequency storms assuming the densest impervious cover that will occur during construction.
 - k. Hydraulic capacity calculations and construction specifications for the emergency spillway if the primary outlet won't pass the 100-year flow.
 - l. Storage computations
 - m. Sediment volume required (& calculations)
 - n. Sediment volume available, cleanout elevation, and depth below the primary outlet.
7. Construction details and specifications for DV, SB, and ST are missing and must be added to the Detail sheet per CGP 9.6.1.c.i.
 8. 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 specifications on the ESC Plan for any disturbed areas not covered by the Landscape Plan.
 9. Replace the City Standard Notes with the current version (attached).
 10. 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.

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