



Alan Varela, Director

September 3, 2024



Mayor Timothy M. Keller

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

**Re: Irby BTS by Skyview West Industrial Park, LLC at 7226 Central Ave SW
Erosion and Sediment Control Plan
Engineer's Stamp Date 8/9/24 (K10E070)**

Mr. Tolman,

Based on the information in your submittal received on 8/23/24, the above-referenced ESC Plan can't be approved until the following comments are 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 and proposed grades must be shown on the ESC Plan, and they must agree with the Grading Plan approved by Hydrology CGP7.2.4.b.ii.
2. You must design stormwater controls in accordance with good engineering practices, including applicable design specifications per CGP 2.1.2. Sites with land disturbing activities of more than 5 acres are considered to be large sites by the EPA, and the City of Albuquerque requires berms and ponds on the low side of large sites in addition to the silt fence that is required on small sites. The ESC Plan must include design calculations and construction specifications for a temporary Sediment Basin (SB) per CGP 2.2.12 stamped by a Professional Engineer registered in the state of New Mexico since the area of land disturbing activities exceeds 5 acres. Please use the attached Sediment Basin (SB) design specifications and include the following information for each SB in your resubmittal.
 - a. Specific location of the basin.
 - b. Plan view of the storage basin and emergency spillway, showing existing and proposed contours.
 - c. Cross section of dam, principal spillway, emergency spillway, and profile of emergency spillway.
 - d. Details of pipe connections, riser-to-pipe connections, riser base, anti-seep control, trash rack cleanout elevation, and anti-vortex device.
 - e. Runoff calculations for 2-year, 10-year, and 100-year frequency storms, if required.
 - f. Storage computations
 - i. Sediment volume required
 - ii. Sediment volume available
 - iii. Elevation of sediment at which cleanout shall be required; also stated as a distance below the crest of the riser

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3. According to the Conceptual Grading and Drainage Plan for this project, dated 6/6/24, a 49-acre upstream offsite watershed contributes to the existing floodplain, shaded Zone X, that covers the west half of this site. The offsite flow should be contained in a non-erosive diversion swale for the duration of construction thus preventing the offsite stormwater from spreading into the disturbed portions of this site. Stormwater from offsite shouldn't be allowed to enter the SB(s) unless they are sized to retain the sum of the onsite plus the offsite volume. Each SB must be sized for the area that drains to it. Additional diversion berms should be identified on the ESC Plan as necessary to divert stormwater from onsite areas of land disturbing activities into the SB(S).
4. I can't tell the difference between building, sidewalk, asphalt, and dirt on the ESC Plan. Construction specifications for these structures must be clearly identified in the SWPPP per CGP 7.2.4.b.vi. The same information is required in the ESC Application. You may attach a copy of the Site Plan to both the SWPPP and the ESC Application to address this requirement. If, only a small fraction of the site is to be developed now, consider limiting the land-disturbing activities to just the first phase of Development.
5. Curb Cutbacks seem to be shown everywhere that C&G is shown on this plan, but that BMP is only appropriate for curbs on public streets, not for private commercial parking lots.
6. The SWPPP must include site-specific interim and permanent stabilization specifications per CGP 9.6.1.c.i. Landscaping specifications are required on the ESC Plan and on the Work Order Plans for all disturbed portions of the public right of way and public drainage easements. Use COA Std 1013 for any ponds with public easements and native seed with aggregate mulch per COA Std 1012 in all other public easements unless otherwise approved in the DRC Plans and ESC Plan . Use COA DWG 2414 or approved equal for the Central Ave public right-of-way. 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 it should be included in the SWPPP. Provide a specification on the ESC Plan for stabilization of Tract B if not covered by a Landscape Plan.
7. The Erosion and Sediment Control ESC Details on sheet 3 of 6 are missing the construction and maintenance specifications as required by the city's ESC Plan Checklist and CGP 9.6.1.c.i. Include construction specifications for the stormwater controls identified on the ESC Plan.

Sincerely,
James D. Hughes, P.E., CPESC

James D. Hughes

Principal Engineer, Planning Dept.
Development and Review Services