



Alan Varela, Director

December 5, 2025

Scott McGee PE
9700 Tanoan Dr. NE
Albuquerque, NM 87111



Mayor Timothy M. Keller

Re: Casitas Del Camino at 120 60th ST NW
Erosion and Sediment Control Plan
Engineer's Stamp Date – 10/27/25 – K11E005A (SWQ-2025-00061)

Mr. McGee,

Based on the information in your submittal received on 11/25/25, the ESC Plan can't be approved until the following comments are addressed.

1. The SWQ information sheet that you submitted in ABQ-PLAN is for the Encanto Apartments in Mesa Del Sol. Resubmit the corrected SWQ Information sheet in ABQ-PLAN.
2. The G&D Plan approved by the Hydrology Section shows more areas of land-disturbing activities than are identified on your ESC Plan. The two plans must agree.
3. Describe the nature and extent of construction activities per CGP 7.2.3.a. Describe the nature of construction activities on the ESC Plan, beginning with the initial establishment of the BMPs, posting of permit coverage, and any demolition covered by the permit. Include a description and project schedule of the construction activities in each portion of the site per CGP 7.2.3.f including earthwork, utilities, vertical construction, paving, final stabilization, removal of BMPs, Certificates of Occupancy, and filing NOT. Specify the Conditions for terminating CGP coverage per CGP 8.2 in the sequence of construction, including the timing of the conversion of the temporary sediment traps into the post-construction SWQ ponds. Also note the property's size and the total area of land-disturbing activities.
4. Add a separate sheet showing demolition activity per CGP 7.2.4.b.i. 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).”*
5. I can't tell the difference between existing and proposed structures. The ESC plan must clearly differentiate between existing structures to remain and new structures per CGP 7.4.2.b.vi. The site plan may be included in the ESC Plan submittal in ABQ-PLAN and in the SWPPP, on separate sheets from the ESC Plan, to clearly identify all structures. However, the limits of disturbance must be shown on the ESC Plan for all areas of land-disturbing activities per CGP 7.2.4.b.i.

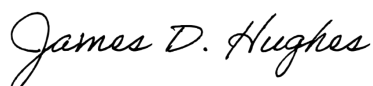
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6. Add sheets to the ESC Plan as necessary to show the locations of any off-site construction support activities associated with this site per CGP 7.2.4.b.vii.
7. The stormwater controls are insufficient, and the BMP details are substandard. Silt fences are not suitable for the large drainage areas and concentrated flows on this site. You must *"design and install all stormwater controls in accordance with good engineering practices, including applicable design specifications"* per CGP 2.1.3. The NMED requirements in CGP 9.6.1.c.i state: *"The SWPPP must also describe design specifications, construction specifications, maintenance schedules (including a long-term maintenance plan), criteria for inspections, and expected performance and longevity of these BMPs. For sites greater than 5 acres in size "BMP selection must be made based on the use of appropriate soil loss prediction models or equivalent generally accepted soil loss prediction tools,"* and part 9.6.1.c.iii states: *"All SWPPPs must be prepared in accordance with good engineering practices by qualified (e.g., CPESC certified, engineers with appropriate training) erosion control specialists familiar with the use of soil loss prediction models and design of erosion and sediment control systems based on these models."* Documentation is required on the ESC Plan. Please replace the BMP details in the ESC Plan with standard details that include design specifications, construction specifications, maintenance schedules, and inspection criteria. Also, provide design calculations and construction specifications specific to this site for Sediment Traps that will retain the necessary volume specified in CGP 2.2.12 from the entire watershed draining to them, where stormwater from this site exceeds the silt fence design specifications. The attached draft BMP details may be helpful.
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 it should be included in the SWPPP. Provide a specification on the ESC Plan for any disturbed areas not covered by the Landscape Plan.
9. Soil information – add a table with name type, particle sizes, and Erodibility factor per CGP 2.1.1. Include soil loss calculations on the ESC Plan per CGP 9.6.1.c.i. if applicable.
10. Update the engineer's stamp date on all sheets whenever a change is made to any of the sheets. Sheets should be numbered sequentially.

If you have any questions, contact me at 924-3420 or jhughes@cabq.gov.

Sincerely,

A handwritten signature in black ink that reads "James D. Hughes".

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