



Alan Varela, Director

October 3, 2024

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



Mayor Timothy M. Keller

**Re: Sage Park at 6601 Sage Rd. SW
Erosion and Sediment Control Plan
Engineer's Stamp Date 8/21/24 (L10E030)**

Mr. Tolman,

Based on the information in your submittal received on 9/26/24, the above-referenced ESC Plan can't be approved until the following comments are addressed.

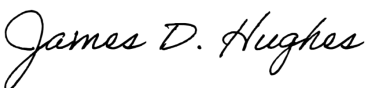
1. The ESC Plan must include design calculations and construction specifications for a temporary sediment basin per CGP 2.2.12 stamped by a Professional Engineer registered in New Mexico since the area of land disturbing activities and the offsite area that drains through the off-site Sage Rd. construction exceeds 5 acres. The hydrology calculations on page 12 of 39 do not account for the offsite 7.8-acre area that drains through the construction area in the Sage Rd right of way, and temporary stormwater controls for the concentrated flows through Sage Rd during construction are missing from the ESC Plan—about 1200 cf additional retention volume seems to be the only way to treat the concentrated flow from the 0.78-acre impervious portion of the offsite basin. The temporary onsite sediment basin provides more sediment volume than required for the combined onsite and offsite drainage. Still, additional controls, like a diversion berm, must be added to the Sage Rd. construction area. The slope below the outlet weir is highly erosive, so an alternative outlet structure that withdraws water from the surface of the sediment basin without causing erosion downstream is required per CGP 2.2.12.d and 2.2.11, respectively.
2. Describe the nature of your construction activities, including both the infrastructure and house construction activities, per CGP 7.2.3 and the property owner/operator associated with each. When will the property be transferred from one owner to another? Also, include the size of your property, per CGP 7.2.3.b, the total area of disturbance, per CGP 7.2.3.c, and the maximum area to be disturbed at any one time, per GCP 7.2.3.e.
3. Also, describe the sequence of stormwater control implementation per CGP 7.2.6.iv. Describe transitions in control from Work Orders to Building Permits and to the project-specific Conditions for Terminating each owner/operator's CGP Coverage per CGP8.2. When will transfer from one owner to another occur, triggering a need for the NOT? When will the sediment basin and berms be installed, and when will they be removed, giving way to the cutback curbs and wattles that will keep sediment out of the lined conveyance systems (C&G, Paving, storm drain, post-construction stabilized pond)?
4. Include a list of all operators on the ESC Plan and in the SWPPP and the areas of the site over which each operator has control per CGP 7.2.1. The areas of control are missing.

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5. The description of how to maintain the Cutback Curb on page 14 of 39 calls for removing sediment when it is filled to less than 2", and the Cutback Curb detail on sheet 31 of 39 doesn't show the slope away from the curb do a depth of 6 to 10" at a distance of 10' behind the curb as shown on the city standard detail (attached). Both pages should be revised to agree with the city's detail and the cleanout elevation should be at half of the specified depth 10' behind the curb. It will not be possible to construct the Cutback Curbs where the sidewalks will be constructed as part of the Work Order, specifically on the north side of Thyme Rd., the south side of Parsley Rd., and the west side of Rosemary St. Where sidewalks preclude the cutback curb, use a silt fence or mulch sock behind the sidewalk instead.
6. The SWPPP must include site-specific interim and permanent stabilization per CGP 9.6.1.c.i. Landscaping specifications are required on the ESC Plan and on the Work Order Plans for Tracts A and B and for all disturbed portions of the public right of way: per COA Std 1013 for Tract A, per COA DWG 2414 at the time of sidewalk construction in all right of ways between the sidewalk and curb, and native seed with aggregate mulch per COA Std 1012 in all other public right of ways and public easements unless otherwise approved in the DRC Plans and ESC Plan. 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. Pond stabilization per COA std 1013 must be added to the WO plans
7. All of the ESC Plan sheets shall measure 22" x 34" with a minimum font size of 0.10" per the city drafting standards in DPM Part 4-2(B). The lettering is too small (0.036" tall) and isn't legible on sheets 31-36 of 36. nearly all of the pages are the wrong size.
8. A PE or a CPESC must stamp, sign, and date each sheet. Update the stamp date on all sheets in the ESC Plan each time a change is made to one or more.
9. The sediment basin's description on pages 7, 11, 18, 31, and 32 as a detention basin is inaccurate and must be revised to a retention basin. The pond detail on sheets 31 and 32 says it is a "Post-Construction Stormwater Management" measure inappropriate as a temporary construction stormwater control, and the detail is significantly different than the Engineer's design on page 12. It must withdraw excess runoff from the surface in strict compliance with CGP 2.2.12.
10. The Inactivity stabilization specifications are required on the Esc Plan and in the SWPPP per CGP 9.6.1.c, including materials, timing, and methods. The section at the bottom of page 18 of 39 must be deleted unless a credible source can be provided. Timing should be as stated in CGP 2.2.14.a & b.

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