



Alan Varela, Director

January 22, 2025

Kelly Fetter, PE
E2RC
439 South Hill Rd.
Bernalillo NM, 87004



Mayor Timothy M. Keller

**Re: Sombra del Oeste Subdivision at 8735 Gibson Blvd. SW
Erosion and Sediment Control Plan
Engineer's Stamp Date 1/13/25 (M09E032)**

Mr. Fetter,

Based on the information in your submittal, received on 1/14/25, the ESC Plan cannot be approved until the following comments are addressed.

Residential subdivisions in Albuquerque are typically constructed in two phases, with the public infrastructure first and the private housing second, with limited overlap, because Building Permits (BP) aren't issued until the water system is complete and the streets are paved. Ponds and berms are the primary BMPs during the first phase, switching to cutback curbs and silt fences in the second phase. Typically, the post-construction stormwater quality ponds are adequate to serve as temporary Sediment Basins (SB) and are the first construction items with the rest of the BMPs. Then, the Cutback Curbs and Silt Fences are built near the end of the Work Order (WO) construction, as the streets are paved and the ponds are final graded and stabilized per Section 1013. The subdivision developer typically maintains the BMPs on the vacant lots until the home builder takes over at the time of the Building Permit. Sediment and pollutants are kept out of adjacent properties by the pond and berms during WO construction and out of the onsite streets with Curb Cutbacks, silt fence, and wattles during the BP construction.

1. Ponds B and C have been redesigned to retain the SWQV on the Work Order Plans and the G&D Plan as required by DPM Article 6-12. They are also identified as the first construction items with notes on the SWPPP Map, sheet 8. However, the "Sequence of Activities" on sheet 2 of the ESC Plan does not include these two ponds as temporary sediment basins. Sheet 2 needs to identify the initial construction and maintenance as temporary sediment basins and the conversion of the ponds to post-construction SWQ ponds at the end of the WO. The Sequence on sheet 2 of the ESC Plans should divide the construction activities and associated BMPs into two phases, describing the transition from the Work Order (WO) to the Building Permit (BP) Phase.
2. The location of the controls during each phase must be shown on the SWPPP Map. The location of ponds and berms is generally specified on sheet 8 of the ESC Plan for Phase 1, but the location of Cutback Curbs and Silt Fences for Phase 2 is missing from the Map. The Cutback Curbs only apply where the sidewalk construction is deferred to Building Permits. The location of sidewalks to be constructed with the Work Order and the deferred sidewalks should be clearly shown on the ESC Plan.
3. The stabilization of Ponds A, B, C, and D must be specified as "Pond Stabilization per City of Albuquerque Standard Specification 1013" in Item #3, Phase 3, in the Sequence on sheet 2 and on the Final Stabilization sheet 11 of the ESC Plan.
4. The grades and layout of the streets and lots on the ESC Plan must agree with the approved G&D Plan including sheet 11.
5. The street longitudinal slopes must be shown on the ESC Plan (also typically required on the G&D Plan). Silt-fence or check dams must be located between each lot in the Cutback Curb Swale where street slopes exceed 2%.



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6. Consider removing or closing the southeast construction exit during rain since it is on the low side of the development and is highly likely to be muddy.
7. Update the engineer's stamp date on all sheets when a change is made to any sheet.

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

Sincerely,

James D. Hughes

James D. Hughes, P.E.

Principal Engineer, Planning Dept.
Development and Review Services