



Alan Varela, Director

December 5, 2024

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 11/18/24 (M09E032)**

Mr. Fetter,

Based on the information in your submittal, received on 11/22/24, the ESC Plan cannot be approved until both the DRC and ESC Plans are revised and resubmitted for approval. The approval of the previous ESC Plan with the engineer's stamp dated 9/18/23 is null and void. Changes made since then by Homewise, Inc., the property owner, are not shown on the ESC Plan and must be revised to agree with the G&D Plan with the engineer's Stamp date of 6/20/24 and the Infrastructure List dated 1/31/24 (attached).

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 during the BP construction.

The City of Albuquerque Development Process Manual (DPM) Article 6-12 requires these *"Best Management Practices (BMPs) to remove pollutants from the stormwater quality volume SWQV by first capturing the volume of the area draining to them, then either infiltrate the volume into the soil, or is reuse the volume for irrigation, or treat the volume by extended filtration, or some combination thereof."* If Ponds B and C were BMP **retention** ponds, they would be adequate to serve as temporary sediment basins, but they are **detention** ponds instead.

1. Since Ponds B & C don't meet either post-construction or during-construction requirements for BMPs, either:
 - a. redesigned Ponds B & C to retain the SWQV on the Work Order Plans and on the G&D Plan as required by DPM Article 6-12 as required by Hydrology or
 - b. Pay fee-in-lieu per DPM Article 6-12 as required by Hydrology and add temporary retention ponds and berms to the ESC Plan per CGP 2.2.12. Include design calculation, dimensions, and construction specifications for additional temporary BMP ponds in the ESC Plan.
2. Ponds A, B, C, and D are identified on the Infrastructure List, but Work Order (WO) plan specifications are inadequate. They lack sufficient dimensions, sections, and specifications to define the required construction. The Work Order Plans must be modified to include the Pond Stabilization per Sect 1013 as required on the Infrastructure list. Add a note requiring retention of



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the 2-yr 24 hr runoff volume so that none of that volume is discharged into the city storm drain or offsite until Ponds B & C are final graded and stabilized per Section 1013. Add details, sections, and specifications to improve pond constructability.

3. The grades and layout of the streets and lots on the ESC Plan must agree with the approved G&D Plan attached.
4. The location of ponds and berms must be specified on the ESC Plan for Phase 1, and the location of Cutback Curbs and Silt Fence must be specified for Phase 2, along with a description of the two phases and the timing of the transition from one phase to the other. 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.
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%. The southeast construction exit on the low side of the development should be deleted to prevent stormwater from exiting through the opening in the perimeter BMPs.
6. 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,

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

James D. Hughes, P.E.

Principal Engineer, Planning Dept.
Development and Review Services