



Alan Varela, Director

Mayor Timothy M.

Keller

January 22, 2026

Troy Kelts, PE
Galloway & Company
15500 Greenwood Plaza Blvd., Suite 200
Greenwood Village, CO 80111

**Re: Take 5 Oil Change at 2030 Gibson Blvd SE
Erosion and Sediment Control Plan
Engineer's Stamp Date – 1/14/26 - M15E021E – (SWQ-2026-00003)**

Mr. Kelts,

Based upon the information provided in your submittal received 1/14/2026, the above-referenced ESC Plan cannot be approved until the following comments are addressed.

1. This 0.42-acre property, Lot C-1 of the Lovelace Heights Addition Plat and Site Plan, is part of a 7.5-acre "Common Plan of Development or Sale" (CPODS). One part or another of the Lovelace Heights Addition CPODS has been under construction for five years. Since there has never been a period when the entire CPODS has been stabilized, the CPODS area cannot be reduced and remains at 7.5 acres. According to CGP 9.6.1.c.i, "for sites greater than 5 acres in size, the BMP selection must be based on the use of appropriate soil loss prediction models". Since this site was all paved before development, the pre-development sediment yield was zero, and the only way to maintain zero sediment yield during construction, as required by CGP 9.6.1.c.ii, is to not discharge any stormwater from the disturbed site during construction.
2. The notes on sheet C1.3 are in error where it says "Existing site runoff discharges through sidewalk culverts into Gibson Blvd." A second Discharge Point goes west into Lot B. Identify both Discharge points on the ESC Plan.
3. The notes on sheet C1.3 are further in error where it says, "Offsite flows don't enter the project site." The off-site areas were previously identified on sheet DR-1 of the approved G&D Plan. Correct the note and identify the off-site drainage areas and their discharge points into this property on a drainage area map as one of the sheets in this ESC Plan.
4. Temporary sediment traps must be constructed upstream of the onsite discharge points as one of the first items of construction, at the same time as the existing pavement demolition. The required size of the temporary sediment traps is based on the entire area, onsite and off-site, that drains to each trap. Include design calculations, construction details, and specifications for the temporary sediment traps in accordance with CGP 2.2.12 in the ESC Plan resubmittal. Add the sediment traps construction as the first item in the sequence of construction, and its removal as the last item after the rest of the site is constructed and stabilized. Sediment traps may have to overlap into the parking lot.

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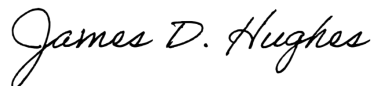
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5. Provide Diversion Channels along the low side of the site to direct stormwater into the Sediment traps.
6. The existing and proposed drainage patterns are not adequately defined. Show the existing grades on the west and east sides of this site, where adjacent development has cut channels and slopes into this site. Identify proposed concentrated flow paths on-site and add spot elevations.
7. The text on the details sheets C3.2 and C3.3 is blurred and illegible.
8. Soil information – add a table with name type, particle sizes, and Erodibility factor (CGP 2.1.1).
9. The city standard ESC notes are missing and must be added to the ESC Plan.
10. 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 be included in the SWPPP. Provide a specification on the ESC Plan for any disturbed areas not covered by the Landscape Plan.
11. Update the engineer's stamp date on all sheets whenever a plan changes on any sheet to reflect the engineer's review of the impact across all sheets.

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

Sincerely,

A handwritten signature in cursive script that reads "James D. Hughes".

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

Comment Responses:

1. Soil Loss Model results added to Section 4 of the SWPPP Report and note added to C3.1.
2. Note revised.
3. Note revised.
4. Sediment Traps added to the plan and SWPPP report. applicable details added to plan set,
5. Diversion channels added to the plan set.
6. Offsite contours updated to reflect offsite work by others. Concentrated flow paths identified with callout and spot elevation.
7. Higher resolution plot used for detail clarity.
8. Soil information table added to Cover Sheet.
9. City standard notes added.
10. Specific interim and final BMPs identified on C3.1. Landscape plans included as a supplemental document to the submittal.
11. New stamp on planset.