



Alan Varela, Director

May 9, 2025



Mayor Timothy M. Keller

G. Robert Adams, PE  
Langan Engineering and Environmental Services, Inc.  
2999 Olympus Blvd.  
Suite 165  
Dallas, TX 75019

**Re: McDonald's at 2000 Gibson Blvd SE  
Erosion and Sediment Control Plan  
Engineer's Stamp Date – 01/10/25 - M15E021G (SWQ-2025-00024)**

Mr. Adams,

Based upon the information provided in your submittal received 5/6/25, the above-referenced ESC Plan cannot be approved until the following comments have been addressed

1. This 1-acre property, Lot A 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 area of the CPODS can't 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 predevelopment 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.
  - a. Add a description of undisturbed and pre-construction ground cover (CGP 7.2.4.e) to the ESC Plan.
  - b. Soil information – add a table with name type, particle sizes, and Erodibility factor (CGP 2.1.1).
  - c. Identify the existing and proposed drainage patterns of this site and its "Discharge Point" per CGP 7.2.4.f.
2. Add a temporary diversion berm to the ESC Plan along the north edge of the proposed parking lot to divert onsite flows into a temporary sediment trap sized to retain 3,600 cubic feet per acre or all of the excess precipitation from the 2-year storm, as per CGP 2.2.12. Add the berm construction to the sequence of construction as one of the first items, simultaneously with the demolition of the existing pavement. Add the removal of the berm to the sequence after the C&G is constructed along the north side of the parking lot.
3. A temporary sediment trap must be constructed upstream of the concentrated discharge point as one of the first items of construction, at the same time as the existing pavement demolition. The temporary sediment trap will be located in the same area as the permanent stormwater quality pond. However, the required size of the temporary sediment basin is based on significantly more precipitation than the permanent pond, so it will require a larger area, potentially overlapping with a portion of the parking lot. Include design calculations, construction details, and specifications for the temporary sediment trap in accordance with CGP 2.2.12 and standard engineering practice per CGP 2.1.2 and CGP 9.6.1 in the ESC Plan resubmittal. Add the sediment trap 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.
4. Specify both temporary and permanent stabilization at the discharge point to prevent erosion per CGP 2.2.1.b and 2.2.1.1.

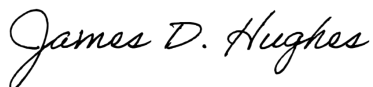
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5. The wattle on the north edge of the site isn't "on contour," so it isn't in keeping with standard engineering practice. Even though most of the drainage area will be diverted to the temporary sediment trap by the temporary berm, the wattle isn't a sufficient control if it isn't installed according to standard practice. Please consider establishing the final grade in the area below the berm and providing immediate final stabilization after grading, rather than using wattle. Final stabilization isn't specified on the ESC Plan for either the SWQ Pond or for the slope, but "Slope & Pond Stabilization per City Standard Specification 1013" is appropriate, and the timing of the slope stabilization should be identified early in the sequence of construction.
6. The SWPPP must include site-specific interim and permanent stabilization per CGP 9.6.1.c.i. The Landscape Plan and Work Order sheets 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 they should be included in the SWPPP. Provide a specification on the ESC Plan for any disturbed areas not covered by the Landscape Plan.
7. Update the engineer's stamp date each time the plan changes. All SWPPPs (SWPPP maps and ESC Plans) must be prepared in accordance with good engineering practices by qualified (e.g., CPESC-certified, engineers with appropriate training) erosion control specialists per CGP 9.6.1.c.iii.

If you have any questions, you can contact me at 924-3420 or [jhughes@cabq.gov](mailto:jhughes@cabq.gov).

Sincerely,

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

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