



Alan Varela, Director

July 1, 2025

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



Mayor Timothy M. Keller

**Re: Tierra Linda at 9801 Ceja Vista Rd. SW
Erosion and Sediment Control Plan (SWQ-2025-00036)
Engineer's Stamp Date 6/23/25 – P09E004**

Mr. Tolman,

Based on the information in your submittal received on 6/25/25, the ESC Plan and EPA Notice of Intent (NOI) can't be approved until the following comments are addressed.

1. The owner information, DBG Properties LLC, as shown on the ESC Plan, Information Sheet, and the NPDES documentation, does not match the available Bernalillo County records, which list "DBG Properties LLC & Peoria Car Wash Partners, LLC, & Tempe Car Wash ETAL" as the property owner. The property owner's NOI is required by City Ordinance § 14-5-2-11. Property rights may have recently changed hands; if so, please provide documentation such as a recorded deed. The correct name and contact information for the entity in control of the property rights is required on the Information Sheet, the NPDES documentation, the SWPPP, and the ESC Plan.
2. The person who signs the certification statement at the end of the NOI must be a "responsible corporate officer" per CGP G.11.1. Provide documentation such as the Operating Agreement (also known as the Certificate of Formation or Certificate of Organization) for the LLC. The officer may delegate signatory authority to another member of the corporation in accordance with CGP G.11.1.2 for signing the remaining documents in the SWPPP and the required reports.
3. The property covers 11.2 acres, not 8.0 acres as shown on sheet 2 of the ESC Plan. An additional 0.3 acres will be disturbed by landscaping and other construction work in the nearby public right-of-way, bringing the overall disturbance area to 11.5 acres instead of the 8.0 acres listed on the NOI and sheet 2 of the ESC Plan. Both areas need to be updated accordingly.
4. 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 it should be included in the SWPPP. Provide a specification on the ESC Plan for any disturbed areas not covered by the Landscape Plan, including the NMDOT right of way, and specify a "Landscape Buffer Swale" between the sidewalk and curb, per COA DWG 2414."
5. Show on-site stormwater drainage patterns before and after major grading activities in accordance with CGP 7.2.4.f. Display existing and proposed contours and storm drains. They must match the approved G&D Plan.
6. Additional stormwater control Best Management Practices (BMPs) are required.
 - a. Silt fences are only effective stormwater controls when placed "on-contour". The silt fences shown on a longitudinal slope are inappropriate as stormwater controls. The silt fences on the north and south sides of the site may effectively control dust, but must be supplemented by temporary diversion berms.
 - b. A temporary diversion berm or swale (DV) is needed in addition to the silt fence along the site's east perimeter. The silt fence alone does not effectively control the concentrated

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stormwater runoff from the end of the parking lot at the northeast corner of the site. Silt fences are only effective when placed "on-contour" and for small areas (10,000 sq ft drainage area per 100 linear feet of silt fence). Either install another temporary sediment trap in the northeast corner or add a temporary berm or swale to divert drainage from the northern half of the site into the sediment trap in the southeast corner. Include a note on the ESC Plan stating that *"the DV must remain until the C&G and storm drain are built, effectively conveying the concentrated runoff into a temporary sediment trap."*

- c. Delete the east construction exit. Add a temporary berm or swale (DV) to divert flows from the driveway into a sediment trap, and put a note on the ESC Plan saying *"the DV is to remain in place until construction and stabilization are complete in the entire area drained."*
 - d. Additional temporary sediment traps (STs) are needed at the sumps in the west parking lot to prevent stormwater runoff from being discharged from the site in the southwestern part of the onsite storm sewers. Add a note to the ESC Plan stating *"the STs are to remain in place until construction and stabilization are complete in the entire area drained."*
 - e. Place notes on the ESC Plan near the two connections to the City's Storm Drain on Ceja Vista Rd., stating *"Storm drain connections to the City's existing pipes in Ceja Vista Rd. will not be allowed until construction and stabilization are complete in the areas they drain."*
7. Design calculations and construction specifications must be prepared in accordance with good engineering practices and certified by a registered professional engineer in accordance with CGP 9.6.1.c. and 2.2.12. for all temporary sediment traps on the ESC Plan.
 8. Update the date on the professional certification on all sheets whenever a change is made to any of the sheets and resubmit the ESC Plan, the property owner's NOI, the SWQ Info sheet, and all other required information in ABQ-PLAN for permit SWQ-2025-00036.
 9. Add a note to the ESC Plan stating, *"An ESC Plan and the offsite property owner's NOI must be submitted to the City for review and approval before starting any offsite construction support activities. An NMDOT Permit is needed before land disturbance in the NMDOT right-of-way north of this site."*
 10. A construction sequence map or index showing the order of building construction and completion, as well as the sequence for the installation and removal of drainage features and BMPs within each building area, should be included in the SWPPP and the ESC Plan resubmittal to the City.

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

Sincerely,

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