

Alan Varela, Director

Mayor Timothy M. Keller

March 18, 2026

Mathew Vallejos
Green Globe Environmental, LLC
PO Box 400
Los Lunas NM, 87031

**Re: Rosa Parks Stockpile and
Tract 1 Block 2 and Lot 5 Block 6 of Unit 26 Volcano Cliffs Subdivision
Work Order CPN 705083
Erosion and Sediment Control Plan
Engineer's Stamp Date: 3/11/26 – C11E004 - (SWQ-2026-00022)**

Dear Mr. Vallejos,

Based on the information in your submittal received on 3/11/26, the ESC Plan can't be approved until the following comments are addressed.

1. The property owner, Jubilee Developments, LLC, must have CGP coverage and a SWPPP for all construction activity on this site and is responsible for coordinating all contractors' activities. Please revise the NOI and ESC Plan to include all areas of land disturbance and resubmit in ABQ-Plan. Two corporations already have active coverage for an 11-acre portion of this property in addition to the 5.75 acres in this submittal. "Group II U26 VC, LLC", the previous owner of Tract 1-B, has active CGP coverage under NMR100504 that needs to be terminated. Guzman Construction Solutions, LLC, the contractor for Pulte Homes on the La Cuentista Subdivision, has active CGP coverage under NMR1004ZB. The Google Earth Street View photo dated 2/2025 below shows the posting, Guzman Construction's water tank, and stockpiles that are part of the construction support activities for the La Cuentista Subdivision. According to Google Earth





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photos, the land disturbance on this site began in 2014, and the CGP coverage that is still active began in July 2022. A final Plat for this 18.3-acre Common Plan of Development or Sale (CPODS) was filed 3/4/2024 in the Bernalillo County records by the previous owner. Then, Jubilee Developments, LLC signed a plat further subdividing the north half into 6 Tracts on 4/29/25. The submitted NOI, NMR1007SH, was certified on 3/10/26 for an estimated 5.75 acres. Both the NOI and the ESC Plan failed to account for the south half of the 18.3-acre CPODS, which is already under active permit coverage.

2. 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 should be included in the SWPPP. The note on sheet ESC 1 says all land disturbing activity in the right of way and easements must be stabilized with Native Seed and Aggregate Mulch per COA Standard Spec 1012, but a "Landscape Buffer Swale per COA DWG 2414" must also be specified on both the Work Order and the ESC Plan in the area between the sidewalk and street. An additional stabilization specification is required on the ESC Plan for all construction support areas.
3. The silt fence on the ESC plan may be required by the City of Albuquerque Environmental Health Department, but it cannot be used as stormwater quality control along a sloping perimeter like Rosa Parks Rd. or for concentrated flows like the pill box inlet. Temporary Diversion Channels (DC) are well-suited for these sloping perimeters to transport construction stormwater to temporary Sediment Basins and Sediment Traps (SB & ST). ST & SB must be sized for the 2-year, 24-hr volume from the entire watershed draining to the pill box inlet, including the entire 18.3-acre property and about 10 acres upstream off-site. Please add appropriate controls to the ESC Plan, including design calculations and construction specifications as required by Parts 2.1, 2.2, and 9.6.1.c.i of the CGP, where it states "The SWPPP must identify and document the rationale for selecting these BMPs and/or other controls. The SWPPP must also describe design specifications, construction specifications, maintenance schedules (including a long-term maintenance plan), criteria for inspections, and expected performance and longevity of these BMPs."
4. These controls must be the first items of construction per CGP 2.1.2 and 2.1.3, and they must remain in effective operating condition during permit coverage as per CGP 2.1.4. The DCs should be placed at the downgradient edge of the site, and the SB should be positioned at the lowest corner for maximum efficiency throughout construction. Please modify the construction sequence on sheet ESC-6 accordingly.
5. 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.

Sincerely,

James D. Hughes

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



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