



Alan Varela, Director

Mayor Timothy M. Keller

February 23, 2026

Kelley Fetter, PE
E2RC
439 South Hill Rd.
Bernalillo, NM 87004

**Re: Stillbrooke Homes at La Mirada Subdivision on Wymont Circle
Lots 2-6, 15-24, and 55-62
Erosion and Sediment Control Plan G19E004A_SB (SWQ-2026-00008)
Engineer's Stamp Date – 1/7/26**

Mr. Fetter,

Based on the information in your submittal received on 2/4/26, the ESC Plan cannot be approved for subdivision and work order until the following comments are addressed.

1. This ESC Plan applies only to the specific lots owned by Stillbrooke Homes at La Morada Subdivision, not the entire La Morada subdivision. Please update the ESC Plan title and project name on the NOI and SWQ Information Sheet to "Stillbrooke Homes at La Mirada Subdivision" and list the relevant lot numbers. A revised ESC Plan must be submitted to the City SWQ Section in ABQ-Plan.
2. Notes 1 and 2 of Phase 1 in the sequence of activities on sheet 2 of the ESC Plan indicate that land-disturbing activities have not yet begun. Since the lots are already disturbed and covered under the CGP by another operator, these notes should be revised, changing "prior to land-disturbing activities" to "prior to purchasing each lot." Additionally, note 2 should specify "verify that the BMPs are in place, including the cutback curb." Note 3 under Phase 2 must be modified to align with City Standard note #9 by requiring changes to be made only by qualified professionals and requiring major changes to be resubmitted to the city for approval.
3. Replace the city standard notes on sheet 3 with the most recent version (attached). Add city BMP details for Stormwater Silt Fence (SWSF) and Cutback Curb (CBC) to better adhere to the NMED requirements in CGP 9.6.1.c.i, where it says paraphrased, "the SWPPP must also describe design specifications, construction specifications, maintenance schedules, and criteria for inspections of the BMPs."

Sheets 9 and 10 incorrectly show areas belonging to other operators that are unrelated to Stillbrooke's property. This ESC Plan should not include lots where Twilight Homes has already built and sold homes, as they no longer qualify for CGP coverage. Similarly, AMREP Southwest, Inc. (NMR10044Z) never owned these lots. Wymont, LLC (NMR10044X) has owned AMREP's lots since they were first platted; last year, they were sold to Amreston Homes LLC, which does not have permit coverage. Please avoid highlighting lots that are irrelevant to Stillbrooke's CGP coverage. Focus the ESC Plan only on the lots for which Stillbrooke Homes is seeking CGP coverage. Twilight Homes owns and maintains CGP coverage under NPDES ID # NMR1006BR for all lots listed in the table on sheet 4 that Stillbrooke Homes has not already purchased. Using standard real estate terms, describe Stillbrooke's purchase of each lot from Twilight and the



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subsequent sale of finished houses to homeowners as the start and end of Stillbrooke's CGP coverage for each lot. Moving the table from sheet 4 to sheet 9, with separate columns for purchase and sale dates, would be helpful.

4. The standard BMP for residential lots is a Cutback Curb (CBC), where sidewalk construction is delayed until after the house is built. Stormwater Silt Fence (SWSF) or Compost Filter Sock are acceptable alternatives to CBCs, especially when sidewalk and HC Ramps prevent the use of CBC. A silt fence is suitable on the sides of the property that do not face the street. However, the existing 0.22 ac-ft post-construction SWQ pond only provides a fraction of the retention volume required by CGP 2.2.12 and city ordinance § 14-5-2-12(b)(3). The 10-year volume of 1.59 ac-ft (per the 2/8/22 Wymont Master Drainage Plan) is necessary for the sediment basin according to city ordinance § 14-5-2-12(b)(3), because the peak 100-year flow rate of 59.98 cfs exceeds the 50 cfs limit. Please update the stormwater controls and highlighting on sheet 9.
5. Please change the track-out note to say 'sediment in the street must be removed by the end of the day' instead of 'as needed.'
6. Update the engineer's stamp date on all sheets whenever any of the sheets are changed.

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

Sincerely,

James D. Hughes

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