



Alan Varela, Director

Mayor Timothy M. Keller

January 5, 2025

Ron Bohannon
Tierra West, LLC
5571 Midway Park Place, NE
Albuquerque, NM 87109

**Re: NOBIS Rehabilitation Hospital at 1100 Woodward PI NE
Erosion and Sediment Control Plan (CPN 703383)
Engineer's Stamp Date 1/29/26 – J15E053 (SWQ-2026-00007)**

Mr. Bohannon.

Based on the information in your submission received on 2/03/26, the ESC Plan cannot be approved until the following comments are addressed.

1. The SWQ Information Sheet was missing and must be included in all submittals and resubmittals in ABQ-PLAN.
2. The owner information, "Cross Development," as shown on the NPDES documentation, does not match the deed recorded on 12/18/25, which lists "Albuquerque Rehab Real Estate Investors, LLC" as the property owner. The property owner's NOI is required by City Ordinance § 14-5-2-11. The accurate name and contact information for the entity controlling the property rights must be included on the Information Sheet, the NPDES documentation, the SWPPP, and in ABQ-PLAN. Contacts may need to create and manage their own accounts to update their contact details in ABQ-PLAN.
3. 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 in the form of the Operating Agreement (AKA Certificate of Formation or Certificate of Organization) that the officer signing the NOI satisfies the requirements of the CGP. The officer may delegate his signatory authority to another member of the corporation, in accordance with CGP G.11.2, to sign the remaining documents in the SWPPP and the required reports.
4. 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. Temporary Diversion Channels (DC) are well-suited for these sloping perimeters to transport construction stormwater to temporary Sediment Basins and Sediment Traps (SB & ST). Cut-back-curb (CBC) may be used instead of the DC. Temporary rock stabilization will likely be necessary with either type of ditch. 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."
5. Calculations and construction specifications are missing for the SBs, and controls for directing construction stormwater into the SBs are inadequate. 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



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at the downgradient edge of the site, and the SB should be positioned at the lowest corner for maximum efficiency throughout construction.

6. Add a bold note to both the ESC Plan and to the Work Order Plan for CPN 703383 stating that “the private storm drain may not be connected to the city’s MS4 until the site construction and stabilization are complete.”
7. How will drainage from the private parking lot on the neighbor’s property to the south be prevented from entering this site? Provide details, both temporary and permanent, of the paved roadway connection shown in the southwest corner of this site that ensures drainage from the neighbor’s property will not flow into this site.
8. The SWPPP must include site-specific interim and permanent stabilization per CGP 9.6.1.c.i. Specify a “Landscape Buffer Swale” between the sidewalk and curb, per “COA DWG 2414” on both the Work Order for CPN 703383 and the ESC Plan.
9. 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,

James D. Hughes

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