



Alan Varela, Director

September 2, 2025



Mayor Timothy M. Keller

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

**Re: Paradise RV Park (aka Birdie RV Park) Phase 2 at 221 Leonidas Ln NW  
Erosion and Sediment Control Plan – K08E003 – (SWQ-2025-00046)  
Engineer's Stamp Date: 8/27/25**

Mr. Tolman,

Based on the information in your submittal received on 8/27/25, the ESC Plan and Notice of Intent (NOI) can not be approved until the following comments are addressed.

1. The property owner information, Karan Veer Rai, listed on the NOI, does not match the available Bernalillo County records, which identify West Mesa RV Park, LLC as the actual property owner. The property owner's NOI is required by City Ordinance § 14-5-2-11. If property rights have recently changed hands, please provide documentation such as a recorded deed or lease. The NOI must include the correct name and contact information for the current entity that controls property rights.
2. Stormwater controls are absent on the Esc Plan for the 4-acre commercial section of Phase 2. The ESC Plan must include an onsite sediment trap (ST) and diversion (DV) to direct onsite drainage into the ST. A construction exit (CE) is also necessary.
3. The ESC Plan stormwater controls are shown on a Conceptual G&D Plan approved by City Hydrology on 9/11/23 for DFT action, not for construction. According to Google Earth, the Phase 1 pond had been filled by the Phase 2 grading by 8/19/2024; however, Phase 2 wasn't approved for Grading until 4/29/25. The existing and proposed grades and drainage features on the ESC Plan must match those shown on the G&D Plan, most recently approved by the Hydrology Section.
4. The Phase 1 pond should still be capturing all of the drainage crossing 102<sup>nd</sup> St., but Phase 2 grading filled in the pond and constructed a block wall along 102<sup>nd</sup> St. last year, diverting that drainage south on 102<sup>nd</sup> St. to Volcano Rd. and into city "Pond NE2," where significant erosion and sediment damage occurred this year. Phase 2 grading was not approved by Hydrology until 4/29/25 and has never been approved by the Construction Stormwater Quality Section of City Planning. The extent to which the unauthorized diversion contributed to Volcano Rd and Pond NE2 damage is unclear, but it seems reasonable to include remediation in Phase 2 plans.
5. The off-site pond west of 102<sup>nd</sup> St. might be sufficient to contain the 10-year flow during the construction of the 102<sup>nd</sup> St. storm drain while building that section of the storm drain in accordance with city ordinance § 14-5-2-12(B)(3); however, the off-site pond isn't shown on the ESC Plan. Include the pond and the limits of the disturbed area. Provide the 10-year and pond volume calculations on the ESC Plan with a PE Certification. Identify where concentrated drainage flows enter the pond and the 100-year overflow route. Explain the final plan for the pond, including the timing and details for final stabilization.



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Will the pond be filled in or left after construction is finished? Since the grading west of 102<sup>nd</sup> St. is in Bernalillo County's jurisdiction, provide documentation showing that it is acceptable to them. Also, submit the off-site pond design to City Hydrology if the pond west of 102<sup>nd</sup> St. impacts the interim or final drainage design.

6. On the ESC Plan, provide a narrative explanation of how you will provide stormwater control, erosion control, and safe passage of the 10-year design storm runoff during construction from May 1 through October 31 in compliance with city ordinance § 14-5-2-12(B)(3).
7. The Work Order (WO) plans don't include infrastructure to intercept the 203 cfs interim 100-yr flow from Volcano Rd. at 102<sup>nd</sup> St. and convey it non-erosively into the city Pond NE2. Revise the G&D and WO plans to provide a permanent non-erosive interception and conveyance from 102<sup>nd</sup> St. into Pond NE2 in accordance with CGP 2.2.11.
8. Identify the limits of construction inside Pond NE2 on the G&D, WO, and ESC Plans, including the areas damaged by erosion on the access ramp and deposited sediment in the bottom of the pond. Include restoration of the damaged low-flow channel between the inlet and outlet at the bottom of the Pond.
9. Update the engineer's stamp date on all sheets each time the plan changes on any sheet to indicate the engineer's consideration of the impact of the change on all sheets.

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

Sincerely,  
James D. Hughes, P.E., CPESC

*James D. Hughes*

Principal Engineer, Planning Dept.  
Development and Review Services