



United States Department of the Interior

NATIONAL PARK SERVICE
Petroglyph National Monument
6001 Unser Blvd NW
Albuquerque, New Mexico 87120



IN REPLY REFER TO:
I.A.I.

November 25, 2022

Jolene Wolfley, Chair, Development Review Board
Via email at: PLNDRS@CABQ.GOV
City of Albuquerque Planning Department
Development Services Division
600 2nd Street NW, Ground Floor, 87102
P.O. Box 1293
Albuquerque, New Mexico 87103

Re: Project# PR-2022-007712
Application# SI-2022-01874 SITE PLAN
SI-2022-01875 SITE PLAN AMENDMENT
SD-2022-00143 PRELIMINARY PLAT

Dear Ms. Wolfley,

I am writing on behalf of the National Park Service (NPS) concerning your decision to approve the apartment complex to be constructed at Lot 5 Block 6 Unit 26, Volcano Cliffs, located on Rosa Parks Rd, NW between Paseo del Norte Rd and Rosa Parks Rd (“Subject Property”). The applicant is Jubilee Developments LLC.

The NPS is concerned about the decision to allow the construction of the apartment complex.

The Subject Property is located approximately 1,500 feet from the boundary of Petroglyph National Monument, at the Piedras Marcadas Canyon area and approximately 100 feet from City of Albuquerque Major Public Open Space at La Cuentista. The preservation of the cultural landscape of Petroglyph National Monument is the primary concern of the NPS, and by law and policy, should be an important concern of the City of Albuquerque (Public Law 101-313; ABC Comprehensive Plan).

On June 27, 1990, Congress passed the Petroglyph National Monument Establishment Act of 1990 creating the Monument as a unit of the NPS, co-managed by the City of Albuquerque, “in light of the national significance of the West Mesa Escarpment and the petroglyphs and the urgent need to protect the cultural and natural resources of the area from urbanization and vandalism ...” Pub. Law 101-313, § 101 (1990). Petroglyph National Monument (Monument) is a cultural landscape, and in particular, the escarpment area, including Piedras Marcadas Canyon both north and south of Paseo del Norte Boulevard, is listed on the National Register of Historic Places (NRHP) as the Las Imagines Archeological District. The area contains significant and numerous cultural resources, including a large concentration of petroglyphs and numerous archaeological sites. The entire Monument area is considered sacred to all 19 Pueblos and 10 additional tribes across the Southwest.

Petroglyph National Monument Establishment Act of 1990, Section 106, authorizes the Secretary of the Interior to participate in land use planning for lands adjacent to the Monument. As the Secretary's designee, the Monument's Superintendent was not officially notified, consulted, nor involved in the planning for the proposed development. No notice was provided to the Monument regarding the Facilitated Meeting. The Monument's Superintendent did not receive official notification of the October 26, 2022, public meeting; however, she was informed of the meeting by affected neighbors and was able to express concerns regarding the project during that meeting.

By failing to even consider the concerns and objections of the National Park Service, and repeatedly stating that it could not consider inconsistencies between the IDO and the concerns of other stakeholders, the DRB is neglecting the historic and cultural significance of this area.

Petroglyph National Monument is one of the most outstanding features of the West Mesa and is sacred to 29 Pueblos and Tribes, important to the residents of the West Mesa, and also to visitors from the United States and around the world. The NPS manages the Monument in cooperation with the City of Albuquerque and the State of New Mexico. Yet in the past several years, it appears the City has forsaken its commitment to preserving this nationally significant resource. This is one of many plots that have been rezoned. We are concerned that the existing zoning in this area, which allows for significantly higher structures near the Monument, will dramatically change the views of the monument and forever detract from the cultural significance of the area. We recommend the City Council revisit the zoning in the Subject Property area, and the area north of Paseo del Norte adjacent to Petroglyph National Monument to allow for the protection of Monument resources and values.

Thank you for your consideration. Please contact me by email at nancy_hendricks@nps.gov if you have questions or would like to discuss further.

Sincerely,



Susanna Villanueva, Supervisory Park Ranger
Acting Superintendent for Nancy Hendricks