



United States Department of the Interior

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



PETR 1.A.1.

December 4, 2025

Re: Project #: **PR-2025-020092**

Application #: **MAJOR_PLT-2025-00016 – MAJOR PRELIMINARY PLAT**

DHO Major Subdivision Action; Unassigned Addresses 99999 Valiente NW; Property Owner
“Volcano Cliffs Inc & Group I U26 LLC RM 115”

Dear Development Hearing Officer,

The National Park Service (NPS) opposes the referenced application that would result in the subdivision of property on the Southeast corner of Paseo and Kimmick into four tracts. It appears this project would affect the applicability of the VPO 2 – Northwest Mesa Escarpment View Protection Overlay Zone and allow for increased building heights in the existing VPO-2 Height Restrictions Sub-area.

While no development project or site plan is being proposed at this stage, it appears that if the area was subdivided, the requirements of VPO-2 would not extend into the newly divided parcels.

Portions of the area proposed for the subdivision and the resulting change to the VPO are within 660 feet of Petroglyph National Monument / Major Public Open Space. Petroglyph National Monument (Monument) is concerned that the increase of allowable building heights from 15'-19' max to 36'-48' max would impact the cultural landscape and viewshed of the area – impeding important views to and from the Monument and across the West Mesa. Per the Northwest Mesa Escarpment – VPO-2 (14-16-3-6(E)), the standards apply to protect views to and from Petroglyph National Monument. This includes a 15' maximum allowed height in the VPO-2 Height Restrictions Sub-area, or 19' with a variance.

We could support the subdivision of the parcel (preliminary plat) if the protections of VPO-2 are imposed on the new parcels. Also, we question the process to approve this proposal. It's our understanding that the IDO requires the review and approval by the Environmental Planning Commission to allow for the subdivision of the parcels, including a sensitive lands analysis and review of a site plan.

Petroglyph National Monument is one of the region's most significant, and large protected areas in Albuquerque. In 1989, community members, Pueblos and Tribes, the City of Albuquerque, and the New Mexico Congressional delegation pushed for the protection of a portion of the West

Mesa to forever protect thousands of petroglyphs and the cultural heritage of the area. Shortly thereafter, on June 27, 1990, Petroglyph National Monument was designated by Congress. The community leaders and elected officials at that time committed to protecting this special place as a unit of the NPS "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).

The stated purpose of Section 14-16-5-2 of the IDO is to "minimize the impacts of development on natural and cultural resources." Petroglyph National Monument is a cultural landscape, and in particular, the 17-mile-long escarpment, which is nearby the subject property, is listed on the National Register of Historic Places as the Las Imagines Archeological District. The escarpment acts as a visual reference point for the city, and 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.

Please uphold the IDO as written, continue to provide for the protection of Petroglyph National Monument by keeping the protection of the VPO-2 on the parcels if the subdivision (preliminary plat) is approved, and help us continue to protect the values and cultural resources of Petroglyph National Monument.

Sincerely,

Nancy Hendricks
Superintendent