

## SANTA CLARA

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## INDIAN PUEBLO

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November 25, 2025

Development Hearing Officer  
C/O City of Albuquerque Planning Department  
Plaza del Sol Building  
600 Second NW  
Albuquerque, NM 87102

RE: Project #: PR-2025-020092

Application #: MAJOR\_PLT-2025-00016 – MAJOR PRELIMINARY PLAT

Dear Development Hearing Officer,

Subject property: “Unassigned Addresses - 99999 VALIENTE NW (x2 lots)”  
Location: “South East Corner of Paseo and Kimmick”  
Property owner: “VOLCANO CLIFFS INC & GROUP I U26 VC LLC RM 115”  
Agent/Applicant: “Property Owner / Modulus Architects & Land Use Planning, Inc.”

The Pueblo of Santa Clara submits this comment vehemently opposing a proposed project that would undermine the View Protection Overlay (VPO) protecting the viewshed of the Petroglyph National Monument (“Monument”) by providing for a division of several parcels below the VPO line that are adjacent to the Monument. Although the Notice of Hearing states that a pre-submittal Tribal Meeting was offered, the Tribal Meeting Request form was completely inadequate under the Integrated Development Ordinance (IDO) § 14-16-6-4(B), and not calculated to give us enough information to respond. The Tribal Meeting request failed to include the email address of the person to whom the Pueblo needed to respond to request a meeting. And most importantly, there is no information to alert the Pueblo of the nature of the proposed project or even why the Pueblo should request a meeting. The inadequacy of the notice denied the Pueblo of an important and protected right under the IDO to engage in the planning process.

The IDO's Tribal Meeting procedures must be met prior to filing the project application with the City of Albuquerque ("the City"), and the applicant's Tribal Meeting Request was wholly inadequate to accomplish the purpose of the IDO's meeting requirement. Under the IDO, a pre-submittal tribal meeting is required because the proposed project is within 660 feet of a Major Public Open Space, which definition includes the Petroglyph National Monument. See IDO §14-16-6-4(B)(1)(b). Reasonable attempts were simply not made to notify our tribal government of this project proposal under the IDO, and thus the pre-submittal meeting requirements were not met. We therefore request that such a meeting be held, that a site visit with Pueblo representatives be conducted at the Monument, and that all other planning phases and application procedures be paused until such time as this important first step has been

accomplished. Because we were not adequately notified, we have not been given important planning information regarding this project proposal, and are at a distinct and insurmountable disadvantage in this development hearing phase.

Our Pueblo has been consistently working to preserve this sacred landscape which holds so many important historical and cultural meanings for our Pueblo. We have worked with the National Park Service to enforce our rights to consultation on various NPS projects, and have been assured, on the national level, that the Park Service is dedicated to maintaining and preserving the Monument in perpetuity and unimpaired for future generations. An unimpaired Monument necessarily includes unimpeded viewsheds of the area. The City of Albuquerque should follow the federal government's lead in preserving the landscape and viewshed intact for future generations. The Petroglyph National Monument was designated for protection by Congress "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). We repeat Congress' prescient characterization for emphasis: "to protect the cultural and natural resources of the area from urbanization." The Pueblo couldn't agree more. This subdivision project and the removal of the building height restrictions for the proposed subdivided property so close to the Monument will violate Congress' intent, and will cause irreparable harm to our connection to our history which we view across this landscape.

Petroglyph National Monument is a cultural landscape, and in particular, the 17-mile-long escarpment is listed on the National Register of Historic Places (NRHP) as the Las Imagines Archeological District. The escarpment and volcanoes are a visual reference point for our Pueblo, and the Monument contains significant and numerous cultural resources, including the large concentration of petroglyphs and other numerous archaeological sites, all of which are culturally, historically, and religiously sacred to our Pueblo. This proposal to subdivide the properties on the NW Mesa Southeast Quadrant of Paseo del Norte and Kimmick would alter the VPO and would detract from this listed District by allowing taller buildings, up to 48 feet high (5 stories), to be built close to the Monument, blocking views across this cultural landscape considered sacred by our Pueblo. Not only does this proposal have a significant impact on our Pueblo, it directly violates the City's own policies.

The preservation of the cultural landscape of Petroglyph National Monument is a primary concern of Santa Clara Pueblo. It is also the policy of the City to "minimize visual impact[s]" of adjacent development and "protect the views to and from the black Escarpment face." ABC Comp. Plan § 11.3.4; see also §§ 10.3.5, 11.1.2 & 11.3.1. This project directly violates both of these policies. As the City notes in its Comprehensive Plan, the Petroglyph National Monument is a "priceless cultural landscape and community resource that provides physical, cultural, and economic benefits." § 11.3.4. This is especially true for our Pueblo and the other 19 Pueblos and Tribes who also hold this landscape as sacred with its extensive and incomparable historical, cultural, and religious significance.

With this comment we urge the City of Albuquerque to affirm its commitment to protect this special and culturally significant place by denying the proposed subdivision of the parcels which result would be to undermine the VPO, which is in place to protect the special character of the Monument. Such a subversion of the City's policies and the VPO's requirements should not be allowed. Additionally, or alternatively, we request that you uphold the IDO processes and require the applicant to conduct a pre-submittal tribal meeting requested with reasonable notice, conduct a site visit with Pueblo representatives so that we may voice our concerns about the proposed project which would irreparably destroy the sacred character of our important cultural heritage, and, if not rejecting this proposal in this hearing, to pause all ongoing planning procedures regarding this proposal until such time as all affected Pueblos and Tribes have been adequately notified and had the time to participate.

Sincerely,

*James Naranjo, Governor*

James A. Naranjo, Governor  
Santa Clara Pueblo

cc: Robert L. Webb, [rwebb@cabq.gov](mailto:rwebb@cabq.gov)  
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