

Attention: Development Hearing Officer

February 10, 2026

The West Side Coalition of Neighborhood Associations responds herein to the supplemental material of February 6, 2026, titled "Updated_Urgent_Sensitive Lands Analysis Updated.pdf".

We reject entirely the characterizations and conclusions of the applicant, and refer the DHO to the relevant provisions of the IDO and the portions of the Comprehensive Plan referenced therein. Furthermore, the disturbance of the property in question, which based upon comments from city staff appears to have been done without authorization from the city, did not alter the localized variations in slope. While the non-permitted activity did remove vegetation (including juniper specimens of over a century in age) and disturbed previously documented archaeological sites, the character of the undulating slope as part of the escarpment remains.

We maintain that this property, under the IDO, requires a Site Plan – EPC prior to any subdivision, as was stated in the prior hearing and in our written submittal. We respond to the Applicant's attempt to reframe the issue by directing your attention to the IDO itself.

The provisions of IDO § 14-16-6-6(l)(1)(a) were enacted to prevent piecemeal development that disregards the Albuquerque & Bernalillo County Comprehensive Plan (ABC), which in Chapter 11, discusses extensively the importance of Heritage Conservation.

If we work to preserve and protect our unique cultural resources, we have an opportunity to leverage the area's distinctive culture and history to strengthen our economy and compete successfully as a region for the growth and development we want.

ABC § 11.1.2.3 describes cultural landscapes. This provision should guide any decision on development in or near sensitive areas, and states:

Cultural landscapes, as defined by the World Heritage Committee, are cultural properties that represent the combined works of nature and man. Cultural landscapes exhibit the interaction between human activity and natural habitat. Such human activity has been interpreted by extension to include religious significance and cultural activities. The Albuquerque area is rich in cultural landscapes, where we can see and experience

the stories of the meaning of these places to Native Americans, early colonists, and today's residents.

The volcanoes, escarpment, and volcanic rock outcroppings on the Northwest Mesa have been used for thousands of years – and continue to be used – for sacred pilgrimages by Native American pueblos. Arroyo corridors through this area provide the historic spine of trails connecting sacred sites from the Rio Grande, up the escarpment, past petroglyphs and other shrines, to the volcanic cones.

Cultural landscapes can also include views to important natural or built features. *Along many corridors, **views to the Sandia Mountains, the Bosque, the volcanoes, and the valley become cultural corridors to those walking, driving, or biking. Views into and from Open Space can also become cultural landscapes.** Open Space inherently operates as a cultural landscape, since it includes natural areas used by humans, while also serving as a home to wildlife and plants.*

*Preserving, enhancing, and leveraging these cultural landscapes can be accomplished through zoning and regulatory standards for development within or adjacent to these areas. **Controls related to the built environment often regulate** access; sensitive edge treatments; materials; **building height**, massing, and placement; walls and fences; signs; and utilities.*

Under ABC POLICY 11.3.4, Petroglyph National Monument, the ABC regulates adjacent development to protect and preserve Petroglyph National Monument– its volcanoes, petroglyphs, and Northwest Mesa Escarpment – “as a priceless cultural landscape and community resource that provides physical, cultural, and economic benefits.” And, the ABC requires that any planning be done in a manner that “[p]rotects [the] views to and from the black Escarpment face, which gives physical order to the community and acts as a visual reference point.” ABC § 11.3.4(g).

The applicant also makes the following statements:

4) Engineering clarification: slope is evaluated by localized, area-specific conditions (not parcel-wide)

For completeness—and to ensure the record reflects the City’s stated methodology—during and after the hearing you clarified how the City determines “slope” for purposes of IDO application:

- **Slope is evaluated on an area-specific basis**, not site-wide.
- The presence of a small, isolated area exceeding 9% slope does **not** define the entire parcel as steep slope land; only the area exceeding 9% would constitute “steep slope.”

- **Slope is determined by localized conditions**, not average site conditions.

This clarification provides the proper framework for evaluating neighborhood assertions and confirms that any slope issue—if present— cannot be applied across the property as a whole.

We pointed out in previous documentation and in the hearing that the applicant was trying to apply a site-wide slope, which if chosen with an inaccurate and biased outcome in mind, would be misleading. Now they seem to agree that their own site-wide slope measurements of each of the parcels were not valid. However, they then seem to ignore the multiple large areas of 9% or greater slope present on both of the parcels in question. They state “Slope is determined by localized conditions, not average site conditions.” We agree, and we presented clear evidence that at least 24 areas of 55 feet in length exceeded 9%, which can hardly be called a “small, isolated area”. They now also make the false claim that the site was graded. I walked the site with an archeologist. While we noted the site had been disturbed, with evidence of a blade used on small portions, it was by no means “graded”, and still maintains its significant undulating character.

The IDO definitions for Sensitive Lands have not changed. They include:

Escarpment

Land with 9 percent slope or more, where development is discouraged. The Northwest Mesa Escarpment is part of the Petroglyph National Monument, which is also designated as Major Public Open Space. See also Open Space Definitions for Major Public Open Space.

Steep Slope

Land with 9 percent slope or more, where development is discouraged.

The Applicant has provided no evidence that the parcels which are the subject of the subdivision request are not sensitive lands, in fact they further confirm it. Their rationale conflicts with the IDO itself, as well as with the provisions of the Comprehensive Plan which must be considered by the EPC in any Site Plan – EPC hearing. The fact that this site remains of significant cultural importance in the context of the cultural landscape of the surrounding area was demonstrated by the testimony by the three participating Pueblos in the prior hearing.

As such we respectfully request that you reject this application, as it is ineligible for action by the DHO, and instead is required to obtain a Site Plan – EPC prior to any subdivision.

Sincerely,

Michael T. Voorhees

Vice President
WSCONA