



July 29, 2026

**Re: Comments on Environmental Assessment DOI-BLM-NM-F010-2026-0002-EA, July 2026.
Evaluation of Potential Revocation of Chaco Withdrawal**

The Society for Historical Archaeology (SHA) appreciates this opportunity to offer comments to the Bureau of Land Management (BLM) on the agency's environmental assessment (EA), prepared in accordance with the National Environmental Policy Act (NEPA), to analyze and disclose the environmental consequences of revoking, or partially revoking, the withdrawal of approximately 338,690 acres of BLM-administered public land in San Juan County in northwestern New Mexico, to reopen the lands to location and entry under U.S. mining laws and to leasing under mineral leasing laws. Public Land Order No. 7923 established a withdrawal in 2023 which withdrew these public lands from development within 10 miles surrounding Chaco Culture National Historical Park (CCNHP) for a 20-year term.

The SHA is the largest scholarly organization focused on the archaeology of the modern world (A.D. 1400-present). Our diverse membership includes historic preservation specialists who prepare cultural resources assessments for compliance with federal, state, and local laws and regulations; and those employed within federal and state agencies involved with and responsible for regulatory reviews. One of the SHA's primary missions is to promote the protection and conservation of archaeological and cultural resources within the United States.

The BLM's EA correctly, on page 28, highlights the importance of lands surrounding the CCNHP:

In general, the Pueblo tribes view the Chacoan landscape as an integrated cultural system spanning northwest New Mexico and beyond, not a collection of isolated sites. They see its network of roads and interconnected communities as reflective of a society that thrived through regional connections rather than isolation. Pueblo tribes have expressed concern that revoking the withdrawal could further compromise what remains of the system. Maintaining this landscape is considered important by the Pueblo tribes for its cultural and historical integrity.

Further, as noted in the Society for American Archaeology's April 6, 2026 letter to BLM during public scoping:

More than 4,200 archaeological and cultural sites lie within the boundary of the 10-mile zone. These places were created by diverse cultural groups—including Paleoindian, Archaic, Pueblo, Navajo, Jicarilla Apache, and others—in time periods from about 10,000 BCE to the present. Because only 15% of the area enclosed by the 10-mile zone has been culturally surveyed, the actual cultural resource count is undoubtedly much higher. These

places are touchstones of history and identity for contemporary Native Americans.

Despite the significance of the landscape surrounding the CCNHP and the known and potential sites within this landscape, in the discussion on environmental consequences of Alternative B (which also apply to Alternative C), BLM states on page 33:

Any potential future development (such as oil and gas development) the BLM proposed to approve would be subject to site-specific analysis under NEPA and pursuant to 54 U.S.C 300101, et seq., commonly known as the NHPA as amended, and 54 U.S.C 306108, commonly known as section 106 of the NHPA. At that time, if the BLM determines that an undertaking would result in an adverse effect that cannot be avoided or minimized, the BLM would develop mitigation in consultation with affected Tribes, the New Mexico State Historic Preservation Officer (NM SHPO), and the Advisory Council on Historic Preservation (ACHP), as appropriate. Based on the BLM's experience with past oil and gas undertakings, including technological innovations such as directional drilling which reduces infrastructure footprint, the BLM does not expect it likely that future potential oil and gas development (including the 73 No Action and 14 Alternative B wells) would result in Adverse Effects to historic properties. Directional drilling can reduce the need to install access roads or additional development pads. Additional changes in industry, such as the establishment or satellite drilling pads, can also reduce potential development footprints. With the applicability of existing laws and the commitments made by the FFO regarding inventory and avoidance of historic properties associated with notice-level mining operations (Section 2.4), the BLM is documenting a determination of No Adverse Effect to Historic Properties from Secretarial revocation of PLO No. 7923, in whole or part.

And on page 67:

Any potential future development subject to BLM discretion would be subject to site-specific analysis. At that time, if the BLM determines that an undertaking would result in an Adverse Effect that cannot be avoided or minimized, the BLM would develop mitigation in consultation with affected Tribes, the New Mexico State Historic Preservation Officer (NM SHPO), and the Advisory Council on Historic Preservation (ACHP), as appropriate. With the applicability of existing laws and the commitments made by the FFO regarding inventory and avoidance of historic properties associated with notice-level mining operations, the BLM has determined that Secretarial revocation of PLO No. 7923, in whole or part, would result in No Adverse Effect to Historic Properties.

A finding of No Adverse Effect is contradicted by several statements in the EA, including the above statement on Page 33 which acknowledges that there may be adverse effect on historic properties in the future. The BLM states that the agency does not expect future adverse effects, but the agency cannot be sure that this is in fact the case as measures to avoid these adverse effects in the future are not codified in an existing Section 106 agreement or other type of document legally committing BLM to avoid these effects.

And on pages 33-34, the EA states:

Surface disturbance associated with reasonably foreseeable oil and gas operations has the potential to adversely impact TCPs and religious properties should the Secretary revoke PLO No. 7923, in whole or part. The magnitude of impacts associated with reasonably foreseeable actions would generally depend upon the location of reasonably foreseeable development relative to areas of concern to Native American tribes. Development on federal lands or with a federal nexus would undergo Government-to-Government and NHPA consultation with regional Tribes, as necessary. In addition, the BLM could apply COAs to protect such properties, which would serve to avoid or minimize impacts. Through tribal consultation, additional mitigation may be developed to avoid or minimize audible and visual impacts on sensitive TCPs. The processing of development applications is a separate undertaking that would be analyzed through the Section 106 process at that time, as directed in law, regulation, and policy.

And on page 34:

The BLM will work with tribal partners at the development stage to provide additional opportunities for consultation. Alternative A would retain all 145 known TCPs at least partially within the existing withdrawal boundary. Alternative B would remove the current withdrawal boundary and increase the potential for adverse effects in the areas with development potential though existing laws, regulations, and policy would remain in place with the ability to avoid, reduce, or mitigate such effects.

The BLM states above that “The processing of development applications is a separate undertaking that would be analyzed through the Section 106 process at that time, as directed in law, regulation, and policy.” However, these applications would not be possible but for the revocation of the withdrawal under Alternatives B and C. These development applications are not separate undertakings under Section 106. Therefore, there is the potential that both Alternatives B and C increase the potential for adverse effects on historic properties.

Further, the purpose and need of the proposed withdrawal revocation is:

... to restore discretion over mineral leasing to the BLM and facilitate mineral development to meet the policies established by EO 14241— Immediate Measures to Increase American Mineral Production, EO 14154—Unleashing American Energy, and Secretarial Order (SO) 3418—Unleashing American Energy. In addition, opening lands to mineral leasing would facilitate development of mineral interests by Indian allottees on approximately 239,685 acres within the 10-mile buffer of the CCHNP.

However, on page 18, related to Alternative B, the BLM states that “...much of the target area for development is already leased.” Further, as the National Trust for Historic Preservation noted in their April 7, 2026 letter to BLM during scoping:

Beyond the significant threat to Chaco Canyon’s cultural and historic resources, there is no legitimate need that justifies opening these lands to drilling. In fact, in July, BLM scaled

back its forward-looking development projections for northwestern New Mexico and reaffirmed that the withdrawal area “is not a favorable target for future development.”

Public Land Order No. 7923 was established to protect the Greater Chaco Landscape given the significance and value of this landscape to the region’s federally recognized Tribes. As stated in BLM’s environmental assessment, both Alternatives B and C have the potential to adversely affect historic properties. And though we understand BLM’s desire to meet the policies established by EO 14241, revocation of the withdrawal will minimally meet the goals of EO 14241, if at all. Therefore, SHA is opposed to the revocation of the withdrawal of lands from development within 10 miles surrounding the CCNHP (Alternative B) and the revocation of the withdrawal of lands from development within a 5-mile buffer surrounding the CCNHP (Alternative C). SHA strongly recommends that the BLM select Alternative A, the No Action Alternative, whereby the original withdrawal pursuant to Public Land Order No. 7923 remains in place for the 20-year term.

We appreciate the opportunity to provide these comments on BLM’s environmental assessment of potential revocation of the Chaco withdrawal.

Sincerely,

A handwritten signature in black ink, appearing to read 'Audrey Horning', with a stylized flourish at the end.

Audrey Horning
President, Society for Historical Archaeology