



February 15, 2019

BLM New Mexico State Office  
Attention: State Director Tim Spisak  
301 Dinosaur Trail  
Santa Fe, NM 87508

Dear Director Spisak:

The Society for American Archaeology (SAA) writes to protest continuing lease sales in the BLM-Farmington Field Office area. Many of the parcels being offered in every quarter contain important archaeological and traditional cultural resources, including those belonging to the Chaco culture. We are particularly concerned that these sales are taking place in spite of the fact that the planned amendment to the existing Resource Management Plan (RMP) has offered few opportunities for the public to comment on the proposed amendment; and that consultation with affected Native American tribes has been inadequate. We request that all further lease sales be deferred until the completion of the amendment to the RMP and EIS.

SAA is an international organization that, since its founding in 1934, has been dedicated to the research about and interpretation and protection of the archaeological heritage of the Americas. With more than 7,000 members, SAA represents professional archaeologists in colleges and universities, museums, government agencies, tribal programs, and the private sector. SAA has members in all 50 states as well as many other nations around the world.

For the past five years, the Farmington Field Office of the Bureau of Land Management (BLM) has been in the process of amending the 2003 Resource Management Plan (RMP) and draft Environmental Impact Statement (EIS) for the Mancos-Gallup Shale Play. This is being done in response to increased oil-gas development in northwest New Mexico, and in conjunction with the Navajo Area Office of the Bureau of Indian Affairs (BIA). The lands involved surround Chaco Canyon, and include many other important archaeological sites, traditional cultural properties, and culturally important landscapes. This ancient landscape contains the physical remains of a thriving Puebloan society that flourished in the Four Corners region of New Mexico from 850-1250 CE. Chaco Canyon was the center of this civilization. The Chacoans and their affiliated Puebloan groups built hundreds of great house structures across the region, and connected many of these places with kilometers of roads and other landscape features. These places have deep spiritual and cultural importance to contemporary Pueblo people and to many Native American Tribes including the Navajo, Apache, and Ute.

Some sites associated with ancient Chacoan society are now protected within the boundaries of Chaco Culture National Historical Park. The canyon itself, and several of the outlying great houses, are also UNESCO World Heritage Sites. Much of the Greater Chaco Landscape, however, lies outside the Park and is poorly protected from the ravages of oil-gas development associated with the Mancos-Gallup Shale play in northwest New Mexico. The threat to sensitive cultural resources is heightened by the current administration, which aims to prioritize energy development on public lands, as exemplified by the quarterly lease sales in the Farmington Field Office boundary.

On January 26, 2018, BLM released a brief outline of amendment draft alternatives, but did not solicit public participation. Little additional progress has been made on this plan during the past year, and there have been no meaningful opportunities for public review or comment on the proposed plan amendment. It is stated that public outreach will resume in spring 2019, with preparation of a Programmatic Memorandum of Agreement among BLM, the New Mexico SHPO, interested tribes, and other consulting parties (including SAA). While BLM is under strict instructions to finish the plan amendment and environmental impact statement by December 2019, many Tribes believe that that the Bureau has yet to do the consultation required under the National Historic Preservation Act and the National Environmental Policy Act. It has become clear that Tribal perspectives have not been and are not being heard or appropriately considered in the compliance process by the Federal agencies.

Given the above circumstances, it is clear to SAA that further lease sales in the affected area would be irresponsible. We request the cancellation of the March 28 and all subsequent scheduled sales, until the completion of the RMP and EIS amendment process. Further, we strongly urge the BLM and BIA to allow full and transparent public review of the amendment process, and meaningful consultation with all concerned Native American Tribes.

Sincerely,



Susan M. Chandler, RPA  
President

Cc:

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The Honorable Ben Ray Lujan  
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