



SOCIETY FOR AMERICAN ARCHAEOLOGY

September 28, 2023

Ms. Sarah Scott
BLM Project Manager
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Mr. Robert Begay
BIA Project Manager
P.O. Box 1060
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Dear Ms. Scott and Mr. Begay,

The Society for American Archaeology appreciates this opportunity to provide input on the Bureau of Land Management's and Bureau of Indian Affairs' revisions to the draft Programmatic Agreement (PA) for the Farmington Mancos Gallup Resource Management Plan Amendment and associated Environmental Impact Statement. We appreciate all of the work done by agency personnel, tribal officers, and other stakeholders throughout this long process. The following comments address PA Draft Revision Seven, as forwarded to consulting parties on August 29, 2023.

The SAA is an international organization that, since its founding in 1934, has been dedicated to research about and interpretation and protection of the archaeological heritage of the Americas. With more than 5,500 members, the SAA represents professional and avocational archaeologists, archaeology students in colleges and universities, and archaeologists working at tribal agencies, museums, government agencies, and the private sector. The SAA has members throughout the United States, as well as in many nations around the world.

We have reviewed the changes in Draft Seven of the PA and conclude that they are all very minor. At this point, the SAA does not believe that line-by-line suggestions are warranted. We do wish to make some general observations.

At least for the time being, the withdrawal of lands available for mineral leasing activities (Public Lands Order 7923) within the 10-mile limit around the Chaco Culture National Historical Park for 20 years has resolved the SAA's major concerns. The draft PA as it now stands is not perfect, but its application to fluid mineral leasing and oil and gas development on lands beyond

the buffer is an improvement over the status quo. The PA offers significantly improved provisions for public involvement in the leasing process. We are still concerned, however, that there is no strategy in place for identification of prehistoric roads. In addition, while the flexible application of visual and auditory Area of Potential Effects is a significant innovation, its effectiveness will depend largely on how it is implemented.

The draft PA still falls short of the landscape-scale protections that are both possible and desirable to protect fragile, irreplaceable, and in some cases sacred heritage. Agency reviews within the current leasing assessment process are deficient because they are sorely lacking in effective heritage protections. Some changes that could be made to improve the process include requiring on-site inspections of potential areas of impact prior to lease sales; requiring the input of Indigenous persons prior to lease sales to ensure that traditional knowledge on the significance of sites, landscapes, and traditional cultural properties to the Pueblos and Tribes is taken into account; and greater use of flexible approaches to resource protection available under the National Historic Preservation Act and other statutes.

The SAA will closely monitor the progress of the PA's implementation and stands ready to weigh in if protections for the area's irreplaceable archaeological and cultural resources are threatened.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. Sandweiss", is written over a faint rectangular grid background.

Daniel H. Sandweiss, PhD, RPA
President